



CORE STRATEGY LOCAL PLAN

**REPORT OF FURTHER CONSULTATION ON HOUSING
NEEDS AND LAND SUPPLY**

JUNE 2017

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1. Introduction

- 1.1 This report sets out the background and results of the consultation undertaken by the Council on the Wirral Strategic Housing Market Needs Assessment (May 2016) and the Wirral Strategic Housing Land Availability Assessment (April 2016), to support the preparation of the Council's emerging Core Strategy Local Plan.

2. Background

- 2.1 This section of the report sets out the background to the consultation processes that were followed.
- 2.2 The Council is required to submit its Core Strategy Local Plan to Government for public examination. The Core Strategy Local Plan is intended to set out the long-term vision, objectives and spatial strategy for the Borough for a period of up to fifteen years. As part of this process, a detailed assessment of the Borough's housing market and future land supply is required. The Local Plan must establish the overall requirement for housing over the plan period, based on the objectively assessed needs of the Borough and must identify enough land for development to meet this requirement.
- 2.3 The latest timetable for the preparation of the Core Strategy Local Plan is set out in the Council's annual monitoring report (December 2016), which can be viewed on the Council's website at <http://www.wirral.gov.uk/planning-and-building/local-plans-and-planning-policy/development-monitoring/annual-monitoring-1>.

3. Consultation Documents

- 3.1 Consultation on the assessment of Wirral's housing need and land supply took place on the following documents:

Strategic Housing Market Needs Assessment (May 2016)

- 3.2 The Wirral Strategic Housing Needs Market Assessment (SHMA) is a key piece of technical evidence required by national planning policy to provide information about the Borough's future housing needs, including the scale, mix and tenure of housing that is likely to be required by different groups of people in the community.

- 3.3 Consultation took place on the following document:

- Strategic Housing Market Needs Assessment (May 2016)

Strategic Housing Land Availability Assessment (April 2016)

- 3.4 The Wirral Strategic Housing Land Availability Assessment (SHLAA) is a technical study which assesses sites that could potentially be brought forward to provide new housing. It is intended to help the Council to decide whether there is an adequate supply of deliverable sites to meet the Borough's identified housing needs.

3.5 Consultation took place on the following documents:

- Main SHLAA Report
- Revised SHLAA Methodology
- Responses to Consultation on Draft Revised Methodology
- Site Assessment Database – Urban Sites
- Site Assessment Database – Greenfield Green Belt Sites
- Questionnaire to Agents with Extant Planning Permission for Fewer than 5 Units 2016
- Questionnaire to Agents with Extant Planning Permission for 5 Units or more 2016
- List of Sites with Planning Permission for New Build Properties April 2016
- List of Category One Sites
- List of Category Two Sites
- List of Category Three Sites
- List of Greenfield Green Belt Sites
- List of Category Three Sites Suitable and Available but not Currently Viable
- Programmed Demolitions April 2016
- Record of Call for Sites Submissions since 2008

3.6 A copy of the Council's Cabinet Report from 18 July 2016, with appendices summarising the contents of the documents and a series of 'Frequently Asked Questions', was also made available for public inspection.

3.7 The consultation was undertaken in accordance with the Council's Statement of Community Involvement adopted in March 2014.

4. Consultation Period

4.1 Consultation on the SHMA (May 2016) and SHLAA (April 2016) began on 10 August 2016 and ended on 23 September 2016.

4.2 Additional days were added to the six-week consultation period to allow for the Bank Holiday and the closure of Council offices on Monday 29 and Tuesday 30 August 2016.

5. Scope of Consultation

5.1 Comments were invited on any part of any of these documents and their associated evidence base.

5.2 Four consultation questions were also provided to indicate the type of information that the Council was particularly seeking to obtain:

- Q1 Do you agree with the analysis contained within the Wirral Strategic Housing Market Assessment (SHMA, May 2016)? Is there anything else that you think should be taken into account?*

- Q2 Do you agree with the range of 'objectively assessed need' identified (pages 8 and 9 and section 8.0 of the SHMA, May 2016 refer)? How much extra housing do you believe is needed to accommodate future economic growth?*
- Q3 Do you agree with the assessment of the housing land supply contained within the Wirral Strategic Housing Land Availability Assessment (April 2016)?*
- Q4 Are there any other sites that you think could be used to provide for additional housing in Wirral?*

5.3 Respondents were asked to state the reasons for their answer to each question and to include the details of any additional sites or information in their replies.

6. Method of Consultation

- 6.1 Notification letters, inviting comments on the consultation documents and saying where they could be inspected, were sent to 1,184 contacts registered on the Council's Local Plan Contacts Database, by email where an email address had been provided or otherwise by post.
- 6.2 A list of the people and organisations contacted is provided in Appendix 1 (page 43) of this report.
- 6.3 The consultation documents, including copies of the notification letter, the associated Cabinet Report and 'Frequently Asked Questions' were placed on the Council's website at <http://www.wirral.gov.uk/planning-and-building/local-plans-and-planning-policy/local-plans/core-strategy-local-plan/further-0>
- 6.4 A link to the consultation was also placed on the Council's Local Planning Consultations webpage.
- 6.5 Printed copies of the consultation documents, including copies of the notification letter, the associated Cabinet Report and 'Frequently Asked Questions', were also placed on deposit for public inspection at the Council's Regeneration and Planning Service at the South Annexe of Wallasey Town Hall and at all 24 public libraries across the Borough, during their normal opening hours.
- 6.6 The documents on the Council's website were also accompanied by an on-line questionnaire on Survey Monkey, to allow comments to be submitted more easily on each of the consultation questions.
- 6.7 Public notices were published for two weeks in the Wirral Globe on 10 August and 7 September 2016.
- 6.8 Electronic notifications, containing a link to the consultation documents on the Council's webpage, were sent to each of the sixty-six Elected Members of Wirral Council and to each of the four Members of Parliament for Wirral on 4 August 2016.

- 6.9 Additional electronic notifications, containing a link to the consultation documents on the Council's website, were also sent to members of the Council's four Constituency Area Committees (977 contacts); the Wirral Partnership and Wirral Plan Delivery Group (102 contacts) on 9 August 2016; the Council's Corporate Mail Chimp database (7,224 contacts) on 12 August 2016; and were included in the Community Action Wirral monthly e-newsletter (to 580 third sector contacts), on 31 August 2016.

7. Consultation Responses

- 7.1 The consultation drew 656 comments from 82 respondents.
- 7.2 A list of respondents is provided in Appendix 2 (page 57) of this report.
- 7.3 Fifty respondents replied by e-mail; three replied by letter; twenty-nine replied via the on-line questionnaire on Survey Monkey; and one respondent also responded via the Council's on-line Mail Chimp application.
- 7.4 Thirty-four (41% of respondents) were local residents; twenty-three were development interests such as landowners, developers and/or their agents (28%); eight were local community groups (10%); seven were public agencies (9%); five were Local Authorities (6%); two were Wirral Councillors; and there were single responses from a national charity; a Registered Social Landlord; and a utilities operator.

8. Content of the Remainder of the Report

- 8.1 The following sections of this report set out a summary of the contents of the representations that were received, grouped broadly by the type of subjects that were raised in response to each of the consultation documents:

Section A Comments on the Strategic Housing Market Needs Assessment
(page 7)

Section B Comments on the Strategic Housing Land Availability Assessment
(page 19)

Section C Comments on the Consultation Process (page 41)

Further information on the content of the consultation and on the emerging Core Strategy Local Plan can be provided by the Forward Planning Team at Wirral Council Environmental Services at PO Box 290, Brighton Street, Wallasey, Wirral CH27 9FQ or at forwardplanning@wirral.gov.uk

A. COMMENTS ON THE STRATEGIC HOUSING MARKET ASSESSMENT

Twelve respondents, seven public agencies, two community groups, one utilities operator, one national charity and one local resident stated that they had no comment to make on the strategic housing market assessment.

The national charity indicated that this was because it had been unable to undertake a detailed analysis and the local resident because housing need was too difficult to quantify.

One community group did not believe that they had the expertise to challenge or agree with the SHMA and the other did not wish to comment until further site-specific work had been undertaken.

The other comments received are set out below:

Calculation of Objectively Assessed Need - General Comments

ID	Summary of Comments Received
117	The Council should retain the positive approach to economic growth set out in the Wirral Investment Strategy and Vision and plan positively to provide homes for a larger working age population than it currently hosts; an objective to sustain neutral level of job growth would not support such growth
118	Growth should not be at a level which would tip the balance away from sustainable development - the Council should ensure that risks to sustainable development are mitigated
174 192 232	It is important that the population based scenarios should not be misinterpreted to be the sole evidence of the 'objectively assessed need', as the other scenarios are all important in establishing the OAN.
177 195 235	Establishing a housing requirement based solely on projecting forward past trends will result in a future requirement which is linked to past performance of housing delivery, perpetuating under-supply.
178 196 236	Consider it vital that the economic growth projections are given considerable weight in determining the requirement as these are based on positively planning for growth.
288	The Council should apply a significant economic uplift to their housing requirement to allow a step change in both housing delivery and economic growth with the Borough and across the sub region
322	The SHMA should refer to the latest 2014-based household projections to ensure the most up to date evidence is included
407	Note findings from recent Sefton and Knowsley Local Plan examinations, where both plans were found sound with housing targets based on demographic OAN rather than economic growth scenarios which were considered too optimistic.
411	Suggest that the Council considers following an approach similar to Sefton, in which a housing requirement based on demographic need was progressed, with an agreement to undertake an early review once sub-regional figures had been established and approved.
465	The lower growth number in the SHMA indicates that businesses in Wirral would struggle to maintain themselves in light of a shrinking workforce and so may move to Liverpool - latest indications are that Liverpool has an employment land shortfall therefore businesses may struggle to find sites/premises in the City.

ID	Summary of Comments Received
466	The higher growth number implies that business growth will accelerate in Wirral, which could be to Liverpool's disadvantage. If Wirral has a housing shortfall against a higher requirement, these businesses may not have access to local resident workforce with which to base their business growth.
507	Depends on the amount of economic growth. How many people for example live in North Wales and commute to Wirral?
511	Difficult to quantify.
517	Economic growth should be assessed by those responsible for it and then we should be informed as to its rate of increase. Only then can we decide if there is any current need to build yet more houses except for social housing which is needed to accommodate the 16,000 people on the social housing list and the 100 Syrian refugees which have been allocated to this area.
578	Wirral is full. Please tell them to go elsewhere
587	Concerns over a housing requirement significantly above that implied by 'demographic OAN' because of the increase in migration required, should have no bearing on the OAN which is unconstrained and policy-off.
608 626	The OAN calculations are 'policy off' and it will be necessary to consider the environmental capacity of the area when deciding appropriate requirement

Objectively Assessed Need – Agree with the Range Identified

ID	Summary of Comments Received
040	Lower range OAN of 875 dwellings per annum is inadequate to support employment growth, so the OAN should be closer to the upper range.
051 063 069	Consider that the SHMA is a robust assessment of the OAN for Wirral and consider that a figure of 1,235 should be applied.
058	Support the adoption of a housing figure that meets the needs of the local population based on national population projections, including the Partial Catch-Up Scenario
075	Agree with detailed analysis contained in SHMA
076	It is difficult to envisage an annual net new dwelling requirement of less than 1,200 if the Council's own published economic growth aspirations are to be met
087 325	The proposed figure of 1,233 dwellings per annum is considered to be the most appropriate, as this will ensure that sufficient homes are provided to support the proposed economic growth
112	Agree with and support the range of OAN identified
119	Consider that the full OAN should be no lower than 905 dwellings per annum and should be as close to 1,233 as is possible to achieve through sustainable development
222	Would encourage a housing requirement of circa. 1,200 homes per year, as stated as the upper range of the OAN in the SHMA; this would provide a sufficiently large labour force to support Experian job growth forecasts. Although ambitious, a lower housing requirement would only serve to constrain opportunities for economic growth and would conflict with the objectives of the framework.
274	Welcomes various scenarios tested and agree OAN sits within the range of 875 to 1235 per annum. Agree with dismissal of scenarios which fail to plan positively for growth.
275	Challenge statement that figure of 1235 dpa is unachievable, as it could be delivered if sufficient land is released for development. The past policies of restricting housing development has resulted in past under-delivery which has compounded affordability - planning for growth under the higher scenario would embrace the objectives of the NPPF.

ID	Summary of Comments Received
301	The Council should be looking to set the OAN at the higher end of the OAN range to meet the economic growth aspirations of the Wirral Plan
336	SHMA upper delivery targets should be reflected in the emerging Local Plan, to address, in part, historic housing under-supply and to provide every opportunity for the local economy to grow appropriately
470	1,235 per annum as a minimum. The greater the supply the less pressure there would be for affordable housing because the price increases of a lower supply will be greater.
471	The assessment is broadly correct.
534	Largely agree but with reservations.
542	It is very difficult to determine the growth scenario(s) that may exist in the future. The Scenario Ai 757dpa (para. 8.5 in the SHMA, May 2016) would therefore be an appropriate figure for the Council to have as its target need for the Borough. This figure, based on the different modelling outputs, could be seen as being aspirational without being over projected.
548	Very detailed. I have no reason to disagree with it.
563	Looks OK as an analysis of the present
588	The only future jobs forecast that is a) policy off and b) will require more homes than the demographic OAN is the Experian December 2015 projections used in Scenario I (1,233 dpa)

Objectively Assessed Need – Disagree With all the Stated Scenarios

ID	Summary of Comments Received
512	I don't believe in economic growth as this goes against a sustainable planet.
516	Do not agree with the range of OAN identified. There is a description of how many dwellings you wish to build but no rationale as to why you should do this (unless I have missed it in your sixty plus pages of information).
529	The Council is acting without any sense. Can they not see that more housing starts a domino effect - the thousands of new houses suggested means thousands of new families whose children will eventually require houses and so on.

Objectively Assessed Need – Should be Lower than the Range Identified

ID	Summary of Comments Received
059	Have concerns over the implications of adopting a higher growth scenario, as the significant in-migration required could impact on surrounding authorities and their own growth and regeneration aspirations or result in unsustainable commuting patterns
106	Disagree with the range of OAN identified. Even if the need is there, there is insufficient land available in Wirral for this amount of housing. Limits have to be drawn.
258	Question why lower end of the range is based on the Partial Catch-Up scenario when there are seven further scenarios that show a lower need, which should have been used instead. Previous past trends show long-term population loss and the projected future growth is therefore surprising.
259	Relying on the higher growth rates is not adequately justified and could lead to an over-supply.
260	As not providing for enough new homes can lead to losing planning appeals and the threat of special measures, a higher figure may be setting up the Council to fail, as its powers to deliver new housing are limited.

ID	Summary of Comments Received
344	Historically, Wirral has delivered far fewer new dwellings than the numbers predicted by NLP. One must therefore be concerned as to the realism and deliverability of their findings from this theoretical exercise.
345	Given the special nature of Wirral, with a history of a declining, ageing population and reducing economic activity, one must ask if the model used by the consultant is appropriate for Wirral, which differs so significantly from, say a developing South East suburb
350	Would not oppose any effective and valuable economic growth in the region but the economic growth predicted by NLP is unrealistic, being based on figures which are too optimistic and which fail to address what is unfortunately a long-term decline in economic activity.
480	Believe it is important to view the OAN range in the context of net completions in Wirral, which have rarely exceeded 600 per year over the last 20+ years.
495	Less than estimated. Vacant stock could be regenerated rather than demolished.
501	No future economic growth has been identified for Wirral. In fact the trend is for migration out of the borough.
502	There are currently enough houses. Estate agent books are full. The Council should take on some of these for their needs.
526	I suggest there is a need for a least 350/400 new homes to be built over the next few years. These could easily be built, for the most part, on existing inner-city/docklands sites without impacting too detrimentally on 'green-belt' areas.
549	Probably less than forecast. Things have probably changed since Brexit. Also if Wirral becomes overdeveloped and an 'urban blob' less people will want to live here and will either stay in Liverpool or move to a more rural area.
557	Year on year we learn that Wirral's population is declining, so I am disinclined to believe that there is suddenly a projected need for housing to the scale that is indicated.
558	I am sure there is a need for more modern housing in Wirral in certain areas but realistically, with Wirral sitting on the doorstep of Liverpool, we just do not attract industry of the size that would generate the projected housing that is specified. Wirral International Business Park was lorded as a prime site that would attract industry and the infrastructure was built to accommodate the projected influx of new business that just never materialised. Much of the new purpose-built office accommodation has remained empty since being built nearly 10 years ago.
564	Economic growth will only lead to an expanded housing requirement if growth in Wirral exceeds growth elsewhere in the UK. Otherwise and better, it needs to arise from increased productivity and stable population. The increasing trend to smaller family units is not guaranteed.

Objectively Assessed Need – Should be Higher than the Range Identified

ID	Summary of Comments Received
039	The OAN is too low and does not align with the economic strategy within the plan and will not meet affordable housing needs
041	OAN should be increased to reflect the increase in household formation rates since 2012.
042	Minimum starting point for calculating the lower range OAN should be the Job Stabilisation scenario (Scenario G) which equates to 790 dwellings per annum.
102	The SHMA should also consider the hidden Gypsy and Traveller Households identified in the 2011 Census, which equates to 77 households
227	Adjustments should be made to the OAN to reflect the rate of under-delivery in Wirral

ID	Summary of Comments Received
468	The recommendation of between 875 dpa and 1,235 dpa is too low and too wide a range. Adopting a figure at the lower end of this range would mean assuming limited employment growth which would be wrong.

Objectively Assessed Need – Alternative Calculations

ID	Summary of Comments Received
006	Suggest an OAN based on future jobs by taking the average of Scenario H and Scenario I, equating to 937 dwellings per annum, to which a 10% uplift should be applied to total 1,030 dwellings per annum, which will equal the demographic housing need, accommodate projected job demand and improve affordability
264	When Green Belt and other restricted land is taken into account, it is likely that the housing OAN range would be around 371 - 673 dwellings per annum to 2032.
290	Suggest a 'working estimate' of the OAN should stand at 1,055 dwellings per annum
591	Taking into account all the evidence, the full OAN should be between 1,020 and 1,110 dwellings per annum, which will accommodate the housing need implied by the latest demographic evidence, meet projected job demand and on reasonable assumptions improve affordability.

Objectively Assessed Need – Relationship with the Liverpool City Region

ID	Summary of Comments Received
035	Wirral's OAN should take account of the more up-to-date housing figures within the Liverpool City Region SHELMA.
266	The Council must not over-plan for housing, involving the loss of countryside to the detriment of plans to regenerate brownfield sites in central urban locations such as Liverpool and should take account of the level of housing and employment needs identified in the Liverpool City Region SHELMA
287	Wirral is part of the Liverpool City Region and provides family housing for a much wider sub-region. Wirral cannot therefore be considered in isolation. Reserve the right to provide further comments once the Liverpool City Region SHELMA has been published
341	With the creation of the Liverpool City Region and its elections in May next year we are concerned that this exercise may have to be re-run in the near future when the Metro Mayor has defined their strategic plans.
404	It is our view that it is not possible or appropriate to identify land in Knowsley to meet housing needs arising in Wirral.
405	If no other authorities are able to accommodate part of Wirral's housing need, the Council will need to consider whether an OAN of the magnitude set out in the SHMA can actually be delivered in Wirral
406	If the Council decided to accommodate the housing requirement wholly in Wirral, there would be impacts on Knowsley, commensurate with the level pursued. This could lead to increased competition for housing investment between Wirral and Knowsley, which could affect Knowsley's growth aspirations and could lead to a shift in migration patterns between Boroughs, resulting in the loss of working age people from Knowsley
408	One option the Council could consider is whether a deliverable interim housing target could be adopted, in the short to medium term, with a commitment to review once the Liverpool City Region SHELMA and subsequent joint work on distributing housing growth across the City Region is available.
410	Evidence shows Sefton is a largely self-contained housing market so may not be able to meet any of Wirral's needs.

ID	Summary of Comments Received
481	Wirral should be working with neighbouring Authorities. Welcome the work that will go into producing a Liverpool City Region SHELMA. The OAN identified by this piece of work is likely to result in a lower figure than the one identified by NLP.

SHMA Methodology – General Comments

ID	Summary of Comments Received
084	The SHMA should refer to the latest 2014-based household projections to ensure the most up to date evidence is included
101	The Council should ensure the Core Strategy Local Plan includes specific detail on Starter Homes
103	The SHMA does not complete its purpose and does not support best practice guidelines because there are no references to Gypsy and Traveller Needs throughout the report. Although the Gypsy and Traveller Accommodation Assessment identifies a need for 6 pitches between 2013/14 and 2017/18, there is no mention of them in the SHMA
255	The SHMA is too economic-focused, to the exclusion of social and environmental factors.
257	The modelling approach should be treated with caution due to uncertainties regarding the recent impacts of the global recession, continued Government austerity and the EU Referendum.
334	The SHMA follows an appropriate methodology but the findings may shift over time in the context of more up-to-date demographic projections.
346	The SHMA shows the proportion of households unable to purchase or rent at the current prices, which would imply that these people must either stay where they are or may move out of the area. If they are going to stay, then the assertion that the average size of household will decline must be incorrect. Would urge the Council to consider a slowly rising size of household in line with the inability to afford housing, rather than the falling size presented in Figure 6.7 of the SHMA Report.
479	Agrees with the methodology adopted and understand the thinking behind the analysis of the figures contained within the SHMA.
486	Why does the data start from 2014. Won't this corrupt the findings?
494	Do not think that the SHMA findings are truly objective and non-political.
506	How can we agree or disagree. It is simply a stab in the dark based on ephemeral figures that will change as circumstances alter.
519	Please demonstrate the need for housing development in line with economic benefit.
545	Impossible to say if I agree because these sections are far too technical and not readily understandable.
562	It is not clear whether the lower population growth resulting from Brexit has been taken into account. Simple extrapolations of trends always end in disaster!
577	Don't agree with the analysis. We live on a peninsular with limited potential for development without spoiling the environment for existing residents.
586	The assumptions relating to the unemployment rate, commuting ratio and economic activity rates used to relates jobs to homes in the SHMA seem reasonable.
593	No adjustment to the 2014-based SNPP is required to address suppressed migration trends.
594	It should be assumed that unemployment rates will gradually fall until reaching the pre-recession level in 2021 and held constantly thereafter and economic activity rates should be projected following the OBR national projection (November 2015).
636	The analysis seems reasonable.

SHMA Methodology - Housing Market Area

ID	Summary of Comments Received
001	SHMA conclusion that Wirral Housing Market Area is self-contained contradicts the draft Liverpool City Region SHELMA which identifies a wider area, including Liverpool, Sefton, Knowsley and West Lancs.
057	The analysis of migration and travel to work patterns indicates that Wirral can be considered as a self-contained housing market area, which corresponds to the evidence underpinning the Cheshire West and Chester Local Plan (Part One).
224	The conclusion that Wirral is a self-contained housing market area conflicts with previous SHMA work and sub-regional work which shows links with other Liverpool City Region authorities. Parts of West Wirral also have a significant relationship with adjacent housing market areas in Cheshire, such as Parkgate, Neston and Willaston.
256	Accepts that Wirral is a single housing market area but Wirral should also arguably be considered with the neighbouring authorities of Cheshire West and Chester and Flintshire, given the travel to work patterns, in addition to Merseyside. Analysis at this level may show that Wirral has not experienced a relatively high rate of house price growth over the period 1999 to 2014.
272	Welcome the finding that Wirral is its own housing market area and that housing need must be calculated accordingly.
340	The consultants should have defined what they meant by the area "Merseyside" since the area has not existed as a formal entity for some years. It is assumed that they are referring to the old Merseyside County Council boundary.
584	It is logical and pragmatic to conclude that Wirral is part of a Central Liverpool City Region Housing Market Area, in line with the draft findings of the Liverpool City Region SHELMA.

SHMA Methodology - Population Trends

ID	Summary of Comments Received
353	It appears that much of the growth in population is from the inflow of pensioners from other parts of Merseyside and elsewhere into the Borough, which is surely not sustainable, given the demands of the elderly on both social services and the NHS and the resultant further imbalance of the population. Unsure whether the Council has the means to address this.
482	Fully recognises the demographic and migration trends summarised within the SHMA, as, in general, older age groups are moving from Liverpool to Wirral and younger people are moving in the opposite direction. An ageing population will obviously have longer term consequences on the demands placed on, and the financial impact to, the Council. Increasing economic opportunities to encourage people of working age into Wirral is undoubtedly required.

SHMA Methodology - Vacancy Rates

ID	Summary of Comments Received
002	Vacancy rate assumptions seem reasonable.

SHMA Methodology - Second Homes

ID	Summary of Comments Received
286	Would welcome evidence which explores the extent of second homes in Wirral and projections for an increase in second homes, accounting for the current proposals for a golf

ID	Summary of Comments Received
	resort in the Borough.

SHMA Methodology – Homelessness

ID	Summary of Comments Received
339	While we realise this is a theoretical exercise, we are glad to see that the real homelessness figure for Wirral has been dropping from over 600 in 2004/05 to 72 in 2015/16.

SHMA Methodology – Scenarios

ID	Summary of Comments Received
003	Agree with discounting Scenarios A, B, C and D as they are unrealistic.
004	Scenario Ai OAN of 757 should be updated to 790 to reflect 2014-based household projections.
005	Future jobs scenarios are generally considered unsound because 1) some of the forecasts are now dated 2) the range of job growth is too wide and 3) an adjusted household formation rate to address suppressed need has not been applied.
085 323	Support the use of accelerated headship rates and migration assumptions under Scenario Ai (Partial Catch Up)
113	Agree and support the Scenario A and Ai Scenario figures, including the uplift in household formation rates.
116	Support the assumptions and basis of modelling explained in paragraph 7.28 and 7.29 of the SHMA Main Report (employment based scenarios).
206	Scenarios F and I contradict the figures based on past trends in jobs under Scenario H. Scenario I is not well explained at paragraph 7.5 of the SHMA Main Report i.e. what is the basis all of the jobs forecasts?
207	Question the explanation for the turn-around from population decline to growth. The report states that this is in part due to the migration of older people from Liverpool yet the number of households with children is also expected to rise.
273	Unclear which of the two OAN scenarios (875 or 1235 dpa) are being put forward by the Council, as they differ vastly.
284	Support the adjustment to household formation rates under Scenario Ai, as past trends reflect the recession and underestimate net international migration into the UK and the recently published 2014-based projections show a further increase in the rate of household growth.
469	The range appears to be a series of excuses and alternative scenarios to try to justify a lower housing figure rather than one which a 'logical' person would reach.
585	Scenario Ai must be updated in light of the latest 2014-based population and household projections and should still incorporate an upward adjustment to household formation rates.
589	Suggest a single 'future jobs OAN' should be provided by taking an average of Scenario H and Scenario I and a 10% uplift should be applied for suppressed household formation rates.
592	Provides three different Household Formation Rates adjustments as an alternative to Scenario Ai, which suggests that demographic housing need would increase to between 780 and 860 dwellings per annum (2014-2032).
595	Past and projected job growth based on the average of the three independent economic forecasts: Cambridge Econometrics (November 2015), Oxford Economics (February 2016) and Experian Economics (December 2015) shows a projected growth of 180 jobs per

ID	Summary of Comments Received
	annum, which should be supported by the OAN for Wirral.
596	Disagree that it is inconsistent to use economic forecasts against a different population projection. Cambridge Econometrics and Oxford Economics have confirmed that their forecasts are not constrained by population.
602	Consider it may be difficult to reduce rates of out-commuting, as suggested under the economic scenarios (Scenarios Ei, Fi, Gi and Ii).

SHMA Methodology - Settlement Areas

ID	Summary of Comments Received
081 319	The SHMA does not adequately set out how the Borough's geography (including Green Belt designation) impacts upon housing need and land availability and how this may have influenced and distorted past housing figures.
082 320	Consideration should be given to the level of affordability in some areas and the availability of a range of suitable homes to meet needs in these areas.
115	In determining a final housing figure, the issues around market signals in some Settlement Areas being worse than average and the impacts of previous planning policy (and the Green Belt) in constraining the delivery of greenfield sites, should be considered.
123	Concerned that the spatial distribution of land availability will not meet housing need in all Settlement Areas.
604	It would be helpful to provide a breakdown of the implications for each of the Settlement Areas contained in the emerging Local Plan, particularly as the Council's Housing Strategy clearly states the intention of providing suitable housing throughout the Borough.
605	Further clarification and underlining of the need for appropriate spatial distribution is required.

SHMA Methodology - Affordable Housing

ID	Summary of Comments Received
208	The SHMA overestimates the need for affordable housing. Older people who move tend to have their own homes/equity and the figures rely on population projections. The figures based on the Housing Register differ significantly. Suggest a need for between 480 and 600 new units and 1,500 affordable units per year, with some people likely to be in both.
225	It would be unrealistic to assume that a 40% affordable housing requirement could be delivered through a revised affordable housing policy for private market housing developments. The Council will need to establish a balance between meeting affordable housing need and the viability of delivery.
267	Support the 40% requirement for affordable housing, if this supports the replacement of older affordable housing stock. Starter Homes are not truly affordable and that the Local Plan must tackle the issue of developers dropping affordable housing contributions on the grounds of viability.
303	The ability to deliver affordable housing as part of open market housing is questionable in Wirral, as a large proportion of Wirral's supply is on small sites below the thresholds set out in adopted and emerging policy. Site-specific viability may also result in even less affordable housing being provided.
474	Extra housing is required to meet the needs of those who cannot afford to buy their home.
487	Need to take account of high percentage of retired people whose capital and other income may not be readily available to them. This is the only explanation I can think of for the assessed housing need for that area.

ID	Summary of Comments Received
488	Don't agree with the scale of the assessed need for Heswall, which should be higher because of the percentage of retired people.
499	Agree there is a need for affordable homes for young married couples to buy and for people who will need care as they age. Disabled people are rarely catered for, so that is needed also.
500	We are totally against large scale social housing estates but maybe adding social housing in small numbers all over the Borough would be a better way to achieve the need.
524	Agree there is a need for social housing
533	Young/first-time buyers: there is a huge disparity between income and ability to buy a property in Heswall. There is a glut of young graduates working in low paid, unskilled jobs due to insufficient job opportunities in Wirral. This is a waste of resources. Perhaps Wirral Waters will attract better quality employment prospects for our young people. When considering properties for first-time buyers, why not examine alternative, less expensive construction materials/techniques such as wood, aluminium and plastics.
535	A target figure of up to 40% seems disproportionately high in relation to current stock, demographic trends and future employment prospects.
601	Social housing is badly needed.

SHMA Methodology - Affordable Housing Uplift

ID	Summary of Comments Received
036	The Council should consider worsening affordability in the context of the wider sub-region and the requirement should be uplifted accordingly in line with national policy and guidance
088 326	Disagree with a 10% uplift to address affordability, which should be higher to address the need for affordable housing.
114	A minimum 10% uplift for affordable housing must be applied.
226	Support the uplift made to the OAN to reflect the need for affordable housing in Wirral.
263	Disagree with the further uplift of 10% to the OAN. An uplift of 2 to 4% would be adequate.
285	Affordability constraints fully justify a market signal uplift of at least 10% when considered in the regional context.
289	Agree that meeting the full affordable housing need of 2,585 dwellings per annum would be unachievable but fully agree that that an uplift is required, with 10% applied as a minimum.

SHMA Methodology - Market Signals Uplift

ID	Summary of Comments Received
007	The latest house price data, at July 2016, crosses the Local Plan Expert Group recommended threshold, beyond which a 10% market signals uplift should be applied.
037	The rate of development falls below previous housing requirements and a substantial uplift is required as a result.
038	A 5% uplift for market signals is not sufficient, as it does not take account of the long-term constrained supply position - a 10% uplift should be applied.
086 324	Support the application of a 5% uplift for market signals.
110	While reasonable at Borough-wide level, a 5% uplift for market signals does not adequately reflect the difference in market conditions in different parts of the Borough. An increased allocation of housing is likely to be needed in some Settlement Areas to address local market conditions and past rates of under-delivery.

ID	Summary of Comments Received
176 194 234	Welcome the recognition in the OAN that market signals, including house price growth and increasing demand for affordable housing, all indicate that the pressure on the housing market is increasing and shows little sign of relenting.
302	Support the 5% allowance for market signals and suggest a further uplift could be accommodated to improve affordability.
347	Forcing a reduction in house prices through extra building is not viable, since developers have shown they are not going to build unless houses can sell and then only if the "current" unaffordable prices can still be achieved.
485	Mortgage rates are at their lowest, so this can't have been taken into account.
590	A10% uplift for market signals should be applied, as the latest affordability analysis from ONS (published after the SHMA was produced) is greater than that predicted by the SHMA.

SHMA Methodology - Housing Mix

ID	Summary of Comments Received
262	To provide for the ageing population, total market and affordable housing should be provided at a rate of 60% 1 or 2-bed and 40% 3 or 4-bed dwellings, which can be built at relatively high densities. The Council should take a flexible approach to achieve a suitable housing mix rather than referring to a standard 'pattern book' development of executive homes where these are not required.
352	Share concern that there are insufficient properties available at the appropriate value that can allow the elderly to downsize. Has the increased longevity of the elderly been taken into account? This must have resulted in a growing number of properties that are not yet vacant but soon will be.
532	Many older person households, which appear to be unwilling to vacate their larger, seemingly unsuitable private properties, have children/grandchildren who they still wish to accommodate during home visits, in particular when their offspring have moved away from Wirral for work. Older people in reasonable/good health do not wish to feel institutionalised and if they are to be coaxed from their larger homes, will need good quality, attractive bungalows in their own area to move into. There are existing models in other parts of the country for private, gated communities with facilities such as health clubs, swimming pools and licensed bar/restaurants, which may provide an alternative for residents currently in larger properties, if it can be recognised that older more affluent residents expect these facilities, rather than feeling as if they are waiting to die! Focusing on health/recreation opportunities when designing developments would also improve the health/wellbeing of older residents and reduce the burden on the NHS.
538	My perception is that there is a lot of sheltered/care accommodation and the report identifies a future need for good quality, attractive bungalows for the private sector.
569	We need more 1 and 2 bed bungalows (not just flats/apartments) and more 1 bed and 2 bed properties for people with disabilities (on DLA/PIP or not) as some people have disabilities but cannot get disabled benefits and think they do not qualify for a bungalow as they are not currently 55 and over. People need smaller properties as their families leave home and when this happens all that can be offered are flats or 2 bed properties which will incur a bedroom tax.

B. COMMENTS ON THE STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT

Seven respondents, six public agencies and one utility operator stated that they had no comment to make on any site specific matters but would still want to be consulted when further stages were reached.

The other comments received are set out below:

General Comments on the SHLAA

ID	Summary of Comments Received
205	From paragraphs 4.1 and 4.3 and Table 4.2, the urban sites yield an average of 10 units per site whereas the Green Belt sites yield over 80 per site - what is envisaged here for the 103 Green Belt sites?
337	The SHLAA follows a recognised methodological approach and appears to be appropriately presented.
473	Some sites indicated as suitable are public open space.
483	Broadly agree with the SHLAA.
490	Given that producing a SHLAA is a central governmental requirement, the Council has made a reasonable attempt in most respects.
496	Do not believe that the SHLAA is an objective assessment.
638	Have read the main report and it seems reasonable.

General Comments on the Inclusion of Sites

ID	Summary of Comments Received
008	Sites where a planning application has been refused or withdrawn should not be included, as their delivery is uncertain.
009	Expired planning permissions should not be included as their delivery is uncertain.
010	Further information is required on the deliverability of Council-owned sites, even where there has been a resolution for disposal.
104	It is wrong to include sites in the SHLAA if there are valid planning reasons for those sites to not be suitable for development. It is up to the market to challenge planning policies and the idea of planning is to direct development to sites that are suitable for development. The current "throw everything in the bucket" approach causes confusion for landowners and distrust for residents.
107	Disagree with the assessment of land in the SHLAA. Much of this land is currently Green Belt.
121	Question the availability and strategic value of using existing employment and recreation sites for housing.
170	Consider that sites with a likely impact on recreational open space, SSSI's, SBI's, SPA's, RAMSAR sites or Green Belt should not be considered for housing and should be placed in a new "Category 4", which means they should be subject to long-term restriction. Infill sites in the Green Belt should be not given such a high score as this would also reduce the area of Green Belt.
204	There is no need to include Green Belt sites in the SHLAA. This looks like urbanisation and a loss of open character and the gradual merging of villages which are part of Wirral's open and village character. There are 568 sites already identified within the urban area and within infill villages. These sites will have a substantial impact on places like Greasby, Irby and Bromborough.

ID	Summary of Comments Received
268	The site identification process may not have considered all brownfield sites in the Council area, as the National Land Use Database may not have been kept up to date.
276	Object to the inclusion of undeveloped housing allocations from the UDP, as these are unlikely to come forward if they have not done so already.
277	Object to the inclusion of sites subject to a refused or withdrawn planning application, as they are predicated on a subjective analysis of whether the reasons for refusal/ withdrawal can be overcome
278	Object to the inclusion of expired planning permissions, as these are clearly undeliverable.
279	Object to the inclusion of sites identified by the Council for future disposal, as it appears to assume that all land owned by the Council is suitable for development, when it may not be.
280	Object to the inclusion of undeveloped land not in active use for recreation or subject to a designation for protection from development, as these should be subject to a specific greenspace review.
359	Support the position that no land that is SSSI or SBI is on the included lists.
364	Support the position that sites wholly within Supporting Habitats are excluded. Despite the uncertainty over the future of European nature conservation provisions, it is vital that wildlife is protected in the interim.
400	Surprised sites 633, 635 and 989 are included in the housing land supply when the Council's established policies set out that the open spaces in Bidston Village are an essential part of the medieval, visual and rural character of the village.
416	Sites subject to a previous refusal or withdrawal should not be included, as there is no guarantee or certainty that these sites are deliverable within the Plan period.
417	Expired planning permissions should not be included as their delivery is uncertain.
418	There is no certainty that sites identified by the Council for future disposal are deliverable.
477	SHLAA identifies 103 wholly greenfield sites in the Green Belt with a potential capacity of up to 8,542 houses. The section delineating Green Belt sites must be deleted because it is unnecessary and dangerous. The presence of this list in the SHLAA and the discussion of a process of formal review of the Green Belt could be interpreted as a marker for future destruction of the Borough's Green Belt that is loved by Wirral residents, Council's Members and officials, as a valuable amenity for walking, cycling, bird-watching, country-watching and photographers.
630	Section 4.3 of the Main Report is truly appalling. The SHLAA identifies a total of 103 wholly greenfield sites in the Green Belt with a total potential capacity of up to 8,542 dwellings. The areas shown on the on-line mapping tool show the extent to which the Green Belt would be eroded. This section must be deleted - it is unnecessary and dangerous.

Comments on the inclusion of 'Windfalls'

ID	Summary of Comments Received
026	The number of windfalls expected from conversion/ changes of use and on previously developed sites is likely to reduce once the Local Plan is adopted and sites are allocated and the SHLAA should reflect this.
049	Calculation of windfalls should be considered in the context of an ageing UDP and the lack of new allocations. Going forward, an up-to-date Local Plan with site allocations to follow will result in a reduction in windfalls.
050	A lower windfall allowance equating to no more than 5% of total supply should be applied.
053 065 071	Consider that the windfall estimates are an over estimation due to the number of sites now assessed in the SHLAA and the absence of up to date allocations. There should be no windfall allowance for years 1 to 3 as the majority of those sites will have planning permission at the base date.

ID	Summary of Comments Received
293	A flat rate of 54 dwellings per annum is optimistic and should fall over time as more sites are picked up through the SHLAA processes throughout the Plan Period. Windfalls should only be considered between years 3-5 to avoid double counting.
435	It is not clear why the future delivery through conversions/ changes of use have been calculated based on data from between 2003 - 2016 while windfalls from new build PDL sites are based on data from 2008 - 2016. It is also unclear whether dwellings provided on garden land have been included in this assessment
436	The number of windfalls expected from conversion/ changes of use and on previously developed sites is likely to reduce once the Local Plan is adopted and sites are allocated. Windfalls should only be counted from years 3-5 to avoid double counting.

Comments on Assessment Criteria

ID	Summary of Comments Received
011 419	The SHLAA should be based on up-to-date evidence particularly in relation to urban greenspace, ecology, recreation and employment land. This evidence is currently out-of-date and based on the UDP.
012 421	Table 3.4 of SHLAA Methodology does not support paragraph 3.28 which states that a score of 4 will be applied where "there is no reasonable prospect of the site being reused for employment purposes".
013 422	Clarification is required on the justification for "existing road access to the site appears adequate" in Table 3.6.
014 423	Clarification is required on the terms "significant scale" and "substantial scale" in Table 3.7 and paragraph 3.39.
015 424	Clarification is required as to what constitutes "significant" ground treatment in Table 3.8 and paragraph 3.40.
016 425	Clarification is required on what is meant by "has been the subject of a recent planning application" under the Market Interest criterion.
017 426	Question whether sites with a Council resolution for disposal dating back to 2013/14 can be classified as deliverable.
018 427	Further information is required on the assessment of the 'availability' of vacant sites to show they are "otherwise available for new development".
019 428	The achievability assessment is still based on the 2013/14 Local Plan and CIL Viability Report and should be based on a more up-to-date position.
020 429	Clarification is required on what is meant by "achievability constraints" in Table 3.14.
021 430	It would be useful to know how many sites, considered to be deliverable by landowners in the planning permissions questionnaire, have actually come forward.
022	The assessment of permanent features should be subject to a site visit and/or as part of the SHLAA Review panel.
023 432	The assumption that all developments over 2ha will be delivered at a 75% net developable area is unrealistic, especially when making allowances for factors such as open space. A further category should be added for developments on sites of over 10ha, to be delivered at 70% net developable area.
024 433	Clarification is required on what constitutes an "easy walking distance" and a "high frequency corridor" when calculating densities.
025 434	Assumptions around build out rates lacks sufficient clarity as the Local Plan and CIL Viability Study should be updated; no differentiation is provided between sites with full or outline permission or where there is more than one developer on site; and factors leading to different lead-in times are not taken into account. A further category should be included for sites of 150 units or more, where a 4 year allowance should be made for sites without

ID	Summary of Comments Received
	planning permission and a 3.5 year allowance for sites with outline consent.
047	The placing of all greenfield Green Belt sites in Category 3 is considered to be unsound as it does not give full and proper consideration to the unmet need in the Borough nor to individual site scores.
048	The SHLAA does not take into account the locations where housing demand is greatest, particularly for affordable housing and does not therefore give due consideration to delivering sustainable development. Sites should be re-assessed to take this into account, alongside a review of the Green Belt boundaries.
077	It appears that no regard has been given to the impact of a site being in a flood plain, which would have implications for the viability/ deliverability of some Category 2 and Category 3 sites, further reducing the Council's overall land supply assumptions.
089 327	Support the re-assessment of sites each year.
090 328	Disagree with the weighting of scores for criteria relating to the Green Belt, flood risk and nature conservation, as to restrict an overall score based upon one criteria seems harsh and ineffective, as in some cases these factors could be easily overcome, for example by only releasing a proportion of a site in the Green Belt.
091 329	Do not support the placing of all greenfield Green Belt sites into Category 3.
094 332	The SHLAA assessment criteria rely on out-of-date UDP policies, which was raised in previous consultations but has not been addressed.
097	The SHLAA should fully consider a site's historic environment and contextual features, including designated historic assets and non-designated features of local interest, when assessing suitability and calculating potential capacity.
098	Strongly advise the Council to engage conservation, archaeology and urban design colleagues at the local and/or county level to inform the SHLAA.
164	Local authorities should refer to the Marine Policy Statement for guidance on any planning activity that includes a section of coastline or tidal river.
169	Concerned about the criteria relating to nature conservation. The Council has a duty to ascertain that a site does not contribute to the integrity of a nature conservation area, for example, as a roosting area for birds. Concerned about the scores given to such sites without further investigation of their ecological value.
211	It does not appear that the SHLAA has had regard to National Trust 'inalienable' land, the importance of such land or the potential impacts of nearby development upon its significance.
220	The Council should consider environmental constraints which may affect the size, scale, form and delivery of housing sites. Biodiversity; geodiversity; landscape character and quality; green infrastructure; access to the countryside and other open space; protection and enhancement of soils; and environmental land management should be fully considered in the process of selecting and assessing sites for allocation.
248	Flexibility should be built into the assessment for the impact on nature and earth science conservation assets (Table 3.3). The Council should have regard to "the hierarchy" referred to in paragraph 3.21, giving "appropriate weight to their importance" rather than unilaterally applying a zero score and effectively ignoring the hierarchy approach.
249	Flexibility should be built into the assessment of the impact on designated open space (Table 3.2). It is possible to relocate 'protected' playing fields to other sites which are not suitably located for housing, thereby giving weight to sites which are potentially suitable for housing.
250	A universal and consistent approach needs to be taken so that sites of whatever designation are not excluded or wrongly scored zero if only part of a site capable of being scored a three is designated.

ID	Summary of Comments Received
251	A flexible approach which recognises that facilities can be relocated, allowing a score of five should be applied, so that sites which are not nationally significant sites of nature conservation can be satisfactorily relocated to release otherwise well-located sites for housing.
252	Consider that paragraph 3.19 which states that "sites that are unlikely to have an impact on an identified asset score most highly" makes no allowance for paragraphs 3.26, 3.49 and 3.53 which seek to direct development to locations supportive of sustainable economic growth and in high frequency public transport corridors.
269	Agree it is appropriate to place all Green Belt sites in Category 3 due to the need to undertake a strategic Green Belt review through the Local Plan before any Green Belt sites are released for housing.
281	Agree with the Council's approach to Stage 2 of the methodology, however, disagree with the 5% 'surplus' or profit margin, which seems particularly low.
282	Unclear how the Council has assessed development potential, particularly the assumptions around net to gross land take. A general rule of thumb is that only 70% of a greenfield site will be net developable acreage.
291	The SHLAA does not reflect the need set out in the SHMA and is therefore not fit for purpose. Every site should be reassessed in the context of the increased level of need.
309	No objection to the assessment of the housing land supply contained in the Wirral SHLAA but proposed allocations within Flood Zones 2 and 3 may need to be supported by a level 2 Strategic Flood Risk Assessment; sites containing or adjacent to a main watercourse may require a permit under the Environmental Permitting (England and Wales) Regulations 2010; and the development of sites with aquatic habitat value or where contamination is known or suspected will need to be supported by investigative surveys. The effect of these constraints must be fully considered prior to any allocation/ re-allocation to ensure sites are deliverable. The Environment Agency has not notified the Council of any critical drainage areas within Flood Zone 1.
312	The categorisation of potential sites in Clatterbridge Ward in Category 3 raises concerns amongst local people, as this means they are categorised as available within 10-15 years.
331	Support the statement that the SHLAA will be reviewed to review constrained sites to assess whether such considerations could be overcome more quickly to bring the site forward sooner but concerned that there is no detail on how or when this review will take place.
355	Urge the Council to look at the latest Environment Agency flood maps when assessing land for development.
431	Assessment of permanent features should be subject to a site visit as it is dependent on when aerial photographs were taken
508	Taking the example of Eastham Conservation Area, the current planning policies and the Appraisals and Management Plans are paramount and cannot be superseded by later plans such as this report.
580	Where sites are being considered for inclusion in the housing supply up to 2037, proper account should be taken of their impact on the setting and character of Wirral's 26 Conservation Areas, particularly in relation to Eastham, Thornton Hough, Saughall Massie, Barnston, Heswall and Meols Drive.
628	The SHLAA should be revisited once the results of the Playing Pitch Review are known.
629	The SHLAA includes are examples of proposed development sites which could be and should be opposed through the planning process.

Comments on the inclusion of a 'Buffer'

ID	Summary of Comments Received
043	The buffer should be applied to the backlog as well as to the five year housing land requirement.
292	A 20% buffer should be applied to the housing land supply to reflect 'persistent under-delivery' in eleven out of the fourteen years since 2002 when Wirral failed to meet its previous targets. The buffer should also be applied to the backlog and the Council should seek to meet the backlog within five years in line with the Sedgefield approach.
294	A 10% deduction should be applied to the total supply to allow for slippage and under-delivery.
414	No allowance is made by the Council in their calculation of the five year supply in the 18 July 2016 Cabinet Report for a 5% or 20% buffer, which is contrary to paragraph 47 of the NPPF.
415	A 20% buffer should be applied for persistent under-delivery in Wirral.

Comments on the Overall Land Supply

ID	Summary of Comments Received
027	The assessment of sites in the SHLAA overestimates potential capacity.
028	The SHLAA shows that 40% of the supply is projected to come forward in years 11-15. Delivery is likely to worsen due to issues of slippage of delivery timescales.
054 066 072	Respondent calculates a residual requirement of between 4,955 and 10,355 dwellings to meet OAN.
120	68% of all sites included in the supply are for 5 units or less, which has implications for delivery, is inefficient, subject to significant uncertainty and unlikely to yield same level of new affordable housing as larger sites.
122	There are few sites above 50 units and only one which is in the planning process. The lack of promotional and planning-related activity associated with large sites in Category 1 could undermine the Council's ability to meet housing needs early in the plan period.
271	Under our suggested revised OAN, the amount of land required would be up to 2,284 dwellings over the plan period.
335	The projections in the SHMA significantly exceed recent building rates and highlight the need for the Council to seek urgent remedies, both immediately and via the adoption of the emerging Local Plan which will significantly boost housing supply and delivery.
342	Surprised at the need to reassess these figures when less than two years ago we were supporting the Council at Planning Appeals with its stance that it had five, if not seven years housing supply available.
461	The assessment of sites in the SHLAA overestimates potential capacity. When the sites suggested by the respondent are excluded, the Council has less than a year's supply of housing land.
627	In order to meet the current shortfall it appears likely that sites currently defined as falling into SHLAA Category 2 may need to be brought forward more rapidly for development if, for example, the results of the shortly expected Playing Pitches Review finds there to be a surplus of such provision in Wirral. In such a scenario some or all of the Category 2 sites currently designated as areas of green space could be moved to Category 1.

Site Submissions – Existing Sites

ID	Summary of Comments Received
056	Request the continued inclusion of site 892 (Land South of Thingwall Rd & East of Harrock Wood).
068	Request the continued inclusion of site 637 (Seaview Meadows, Leasowe Road).
074	Request the continued inclusion of site 1781 (Land south of Greasby).
078	Request that site 627 (Former La Mirage Nightclub) is released for immediate development to meet needs.
095	Request the continued inclusion of site 904 (Land at Birkenhead Road, Meols).
130	Request the continued inclusion of site 648 (West of Raby Hall, Raby Hall Road).
136	Request the continued inclusion of site 883 (Land West of Thorncroft Drive).
137	Request the continued inclusion of site 882 (Land East of Thorncroft Drive).
138	Request the continued inclusion of site 881 (Land North of Gills Lane).
139	Request the continued inclusion of site 884 (Land South of Gills Lane).
140	Request the continued inclusion of site 871 (Land North of Storeton Lane).
141	Request the continued inclusion of site 870 (Land South of Storeton Lane).
145	Request the continued inclusion of site 878 (Land off Chester Road).
149	Request the continued inclusion of site 649 (Land East of Raby Hall).
151	Request the continued inclusion of site 865 (Land to North of Clatterbridge Hospital).
152	Request the continued inclusion of site 862 (Land North of Green Bank).
153	Request the continued inclusion of site 863 (Home Farm, Brimstage Road).
154	Request the continued inclusion of site 864 (Land South of Brimstage Road).
159	Request the continued inclusion of site 947 (Land at The Green, Raby).
200	Request the continued inclusion of site 1880 (Land at Roman Road, Prenton).
231	Request the continued inclusion of site 1930 (Land at Vineyard Farm).
242	Request the continued inclusion of site 503 (Former Goods Yard, Bebington).
245	Request the continued inclusion of site 650 (Eastham Rake).
246	Request the continued inclusion of site 738 (Sable, Bidston).
247	Request the continued inclusion of site 919 (New Brighton Rugby Club, Reeds Lane, Leasowe).
304	Request the continued inclusion of site 903 (Land off Lowfields Avenue/Kingsley Avenue, Eastham).
338	Request the continued inclusion of site 647 (Octel Sports Club).
413	Request the continued inclusion of site 1549 (Land off Chester Road, Heswall).

Site Submissions – Amended Sites

ID	Summary of Comments Received
131	Request the continued inclusion of site 879 (Greasby Copse) but with an amended (larger) boundary.
132	Request the continued inclusion of site 880 (Limbo Lane) but with an amended (larger) boundary.
133	Request the continued inclusion of site 885 (Woodchurch Road/Landican Lane) but with an amended (larger) boundary.
135	Request the continued inclusion of site 876 (Land NE of Murrayfield Hospital) but with an amended (larger) boundary.

ID	Summary of Comments Received
142	Request the continued inclusion of site 869 (Land at Barnston Road) but with an amended (larger) boundary.
144	Request the continued inclusion of site 877 (Whitfield Lane) but with an amended (larger) boundary.
146	Request the continued inclusion of sites 868 and 1824 (Land at Rest Hill Road) but with an amended (larger) boundary.
147	Request the continued inclusion of sites 867, 1823 and 1926 (Land at Red Hill Road) but with an amended (larger) boundary.
155	Request the continued inclusion of sites 860 and 945 (Land on Grange Drive) but with an amended (smaller) boundary.
156	Request inclusion of site 886 (Land East of Thornton Village) but with an amended (smaller) boundary.
157	Request the continued inclusion of sites 858, 859 and 946 (Land South of Thornton Hough) but with an amended (larger) boundary.
158	Request the continued inclusion of site 874 (Land on Raby Road) but with an amended (larger) boundary.
160	Request the continued inclusion of site 873 (Land South Willowbrow Road) but with an amended (larger) boundary.
243	Request the continued inclusion of site 514 (Prenton Dell Road) but with an amended (smaller) boundary.
244	Request the continued inclusion of site 535 (Carr Lane, Moreton) but with an amended (larger) boundary.
316	Request the continued inclusion of site 954 (Land South of Westgate Road) but with an amended (smaller) boundary.
333	Request the continued inclusion of site 1770 (land north of Hilbre High School) but with an amended (larger) boundary.

Site Submissions – New Sites

ID	Summary of Comments Received
134	Request the inclusion of a new site at Landican Lane.
143	Request the inclusion of a new site to the west of Barnston.
148	Request the inclusion of a new site to the west of Raby Mere.
150	Request the inclusion of a new site to the south of Raby Hall.
182	Request the inclusion of a new site to the rear of the Ridgeway, Meols.
183	Request the inclusion of a new site at Fornalls Green Lane, Meols.
184	Request the inclusion of a new site at the Stables at Fornalls Green Lane, Meols.
185	Request the inclusion of a new site at Meols.
186	Request the inclusion of a new site adjacent to Hoylake Rugby Club, Hoylake.
187	Request the inclusion of a new site at Wittering Lane, Lower Heswall.
188	Request the inclusion of a new site at Riverbank Road, Lower Heswall.
189	Request the inclusion of a new site at Davenport Road, Lower Heswall.
190	Request the inclusion of a new site at Manners Lane, Heswall.
240	Request the inclusion of a new site to the south of Brimstage Road, Bebington.
647	Request the inclusion of a new site to the north of Gilroy Road, West Kirby.
648	Request the inclusion of a new site at Albert Road, Hoylake.

Site Submissions – Deleted Sites

ID	Summary of Comments Received
126	Request the deletion of site 856 (Land at Landican Village).
127	Request the deletion of site 1925 (Land at Landican Village).
128	Request the deletion of site 875 (Land North of Willowbrow Road).
129	Request the deletion of site 948 (Land Adjacent Wheatsheaf Inn).

Wirral Waters Should Be Included in the Housing Land Supply

ID	Summary of Comments Received
165	Peel must provide the residential development needed to accommodate the people attracted from outside Wirral, including sufficient houses and apartments that are available for employees on more modest income, to reduce pressure on land outside Wirral Waters.
270	The 1,000 units that could be provided by Peel at Wirral Waters must be included in the five year supply, and the 13,521 units with an extant permission should be included in the 15 year supply, to prevent the loss of greenfield land.
298	Increasing delivery at Wirral Waters could make a contribution but suggest this is unlikely to exceed 100 dwellings per annum (1,500 over the Plan Period).
313	Attention should be focused on ways of improving deliverability at Wirral Waters rather than diverting development to significantly less appropriate locations, potentially by redesigning the development.
351	Support revitalising the area. Major economic growth should be focussed at Wirral Waters and the housing would be available to support such growth.
536	It is not yet known what the impact of the Wirral Waters development will be but if we look at the impact of Liverpool One and other dockland developments, it can be anticipated that Wirral Waters may create a migration surge to the Core/ Birkenhead area with a ripple effect on surrounding areas. Dockland apartments will be especially desirable for younger, childless single/couples.
620	In favour of development on brown field sites at Wirral Waters.

Wirral Waters Should Not Be Included in the Housing Land Supply

ID	Summary of Comments Received
031 460	Deliverability of Wirral Waters is uncertain.
046	Supports exclusion of Wirral Waters from housing supply due to uncertainty.
229	Support the exclusion of Wirral Waters from the assessment of land supply. Consider these should be treated as windfalls given the significant uncertainty concerning delivery.

Other Site Specific Comments

ID	Summary of Comments Received
212	Site 892 (Land South of Thingwall Road and East of Harrock Wood, Irby). Not convinced that it is suitable for development, having regard to the likely impact upon the significance of Harrock Wood.
213	Site 1761 (Site 2, East of Sandy Lane North, Irby). Not convinced that it is suitable for development, having regard to the likely impact upon the significance of Thurstaston Common.

ID	Summary of Comments Received
214	Site 1762 (Site 3, East of Sandy Lane North, Irby). Not convinced that it is suitable for development, having regard to the likely impact upon the significance of Thurstaston Common.
215	Site 1776 (Land on Mill Hill Road, Irby). Not convinced that it is suitable for development, having regard to the likely impact upon the significance of Thurstaston Common.
216	Site 1778 (Land adjacent Sandy Lane, Irby). Not convinced that it is suitable for development, having regard to the likely impact upon the significance of Thurstaston Common.
217	Site 1790 (Land at Sandy Lane, Irby). Not convinced that it is suitable for development, having regard to the likely impact upon the significance of Thurstaston Common.
306	Site 633 (Land off Lennox Lane). The inclusion of the site is misleading when the site may not receive planning permission because of other policy constraints which prohibit such development. Therefore object to inclusion as there is no likelihood, from a planning point of view, that this would be allowed.
360	Site 514 (Prenton Dell). This is an SBI including Ancient Woodland and Open Mosaic Habitat, which would be damaged or destroyed by housing. There are also severe constraints regarding access and flooding.
361	Site 879 (Land around Greasby Copse). There is a woodland SBI in this location which would have to be protected with a reasonable buffer, which would reduce the developable area of the site.
362	Site 503 (Former Goods Yard, Bebington). This is the New Ferry Butterfly Park SBI
363	Site 1930 (Vineyard Farm). This is the last open area adjacent to that section of Dibbinsdale SSSI and is important to the functioning of that SSSI.
365	Site 916 (Grange Hill Farm). Assessment should note possible lizards and adjacent SBI
366	Site 1883 (Quarry Road East). Assessment should note that the site falls within a badger foraging area.
367	Site 708 (The Akbar). Assessment should note that the site falls within a badger foraging area.
368	Site 933 (Grange Water Treatment Works). Assessment should note lizards and adjacent SBI.
369	Site 1053 (Plymyard Avenue). Assessment should note mature trees, possible bat roost and an established public footpath.
370	Site 1444 (Adjacent 20 Uplands Road, Bromborough). Assessment should note proximity to adjacent Dibbinsdale SSSI including the Cheshire Wildlife Trust nature reserve at Patricks Wood.
371	Site 1740 (Adjacent 22 Oldfield Gardens). Assessment should note proximity to adjacent Heswall Dales SSSI and the Cheshire Wildlife Trust nature reserve at Cleaver Hill.
372	Site 887 (Pineridge Close). Assessment should note the impact on the River Dibbin.
373	Site 1039 (North Close/Uplands Road). Assessment should note the proximity to Dibbinsdale SSSI.
374	Site 1044 (Croft Drive West). Assessment should note that the site is a badger foraging area.
375	Site 1079 (Water Tower). Assessment should note that the site is a badger foraging area.
376	Site 1087 (15 Oldfield Drive). Assessment should note the site is adjacent to Heswall Dales SSSI and is a badger foraging area.
377	Site 1491 (Rear of Dale End, Bush Way). Assessment should note the site is adjacent to Heswall Dales SSSI and is a badger foraging area.
378	Site 1719 (Riverside Park). Have recently objected to this site for housing, on the grounds of disturbance to the adjacent bat roosts from lights and noise. The area is currently low-lit at night.

ID	Summary of Comments Received
382	HLA Ref 90200 (Land West of 2 Mill Road, Bromborough) contained in Appendix 5 - Sites with Planning Permission for New Build Properties. The estate agent has informed us that land has not yet been sold and no work has been done so far even though it is listed as under construction.
383	Site 299 (Rear of 49 Plymyard Avenue). Difficult to envisage access to this site.
384	Site 894 (Abbey Grange, Bridle Road). This is a most significant historical and archaeological site of considerable antiquity. Flooding risk noted.
385	Site 981 (Acre Lane). The Acre Lane referred to is in Heswall not Bromborough.
386	Site 647 (Octel Sports Club). Access could not be from Raeburn Avenue and would have to be from Morland Avenue and will be extremely difficult and controversial. The trees are probably subject to TPO.
387	Site 683 (Land at The Rake). Currently designated as Urban Greenspace and is a much valued public amenity.
388	Site 684 (Land at Allport Road). Between residential properties and office premises. High water table. Effect on adjacent trees. Should be in Clatterbridge Ward.
389	Site 1032 (Rear of 54 Dibbinsdale Road). Not in Bebington, should be in Clatterbridge Ward.
390	Site 1033 (Land at rear 38 Plymyard Avenue). Appears to contain a large pond.
391	Site 1053 (Land between 39 and 45 Plymyard Avenue). Appears to contain a large pond.
392	Site 1444 (Land adjacent 20 Uplands Road). Would pose a threat to the stability of the adjacent SSSI.
393	Site 887 (Land off Pineridge Close). Wholly inappropriate, perceived effect on stability of slope; effect on Local Nature Reserve/Brotherton Park and a Heritage Site (St Patrick's Well). Should be Bromborough Ward.
394	Site 1039 (1 North Close). Site is adjacent to Brotherton Park/Dibbinsdale Nature Reserve.
395	Site 1500 (Meadowcroft, Spital Road). Highly unlikely to available for at least a decade.
396	Site 1719 (Land at Riverside Park, Southwood Drive). This site is inappropriate for housing as it would contravene the Council's land designation policy.
398	Site 633 (Land off Lennox Lane). This area of land and the backdrop of established trees is very important visually to Bidston Village.
399	Site 635 (Land Adjacent to Yew Tree Farm). This area of land is a crucial green corridor forming an essential element of the rural setting of the old farms of Bidston Hall Farm, Yew Tree Farm, Irby Farm and Church Farm.
401	Site 989 (Car Park at Kingdom Hall, School Lane). Building on this site would bring problems associated with on-street parking. The Kingdom Hall is well established and regularly used. I have been informed that legal action will be taken if attempts to compulsorily purchase the Kingdom Hall are made.
437	Former Site of the Dell Primary School (Site with Planning Permission). No evidence of delivery so should be removed from the 15 year supply.
438	Site 557 (Former Housing, Buccleuch Street). No evidence of delivery so should be removed from the 15 year supply.
439	Site 572 (Former Gas Holder, Patten Street). No evidence of delivery so should be removed from the 15 year supply.
440	Site 745 (Land at Hind Street, Birkenhead). No evidence of delivery so should be removed from the 15 year supply.
441	Site 647 (Octel Sports Club, Bridle Road). No evidence of delivery so should be removed from the 15 year supply.
442	Site 1445 (Land at Glenavon Road, Prenton). No evidence of delivery so should be removed from the 15 year supply.

ID	Summary of Comments Received
443	Site 693 (Upton Cricket Club, Upton). No evidence of delivery so should be removed from the 15 year supply.
444	Site 441 (Land at Tunnel Road/Waterloo Place). No evidence of delivery so should be removed from the 15 year supply.
445	Site 482 (Argyle Industrial Estate). Not suitable for housing and no evidence of delivery so should be removed from the 15 year supply.
446	Site 1336 (Land at Hind Street (2), Birkenhead). No evidence of delivery so should be removed from the 15 year supply.
447	Site 504 (Pluto Tanks, Bolton Road East). No evidence of delivery so should be removed from the 15 year supply.
448	Site 1719 (Land at Riverside Park, Bromborough). No evidence of delivery so should be removed from the 15 year supply.
449	Site 1722 (Thermal Ceramics, Tebay Road). No evidence of delivery so should be removed from the 15 year supply.
450	Site 512 (Surplus Land at Clatterbridge Hospital). No evidence of delivery so should be removed from the 15 year supply.
451	Site 1544 (Champions Business Park, Upton). No evidence of delivery so should be removed from the 15 year supply.
452	Site 1481 (Recreational Open Space, Hoylake). No evidence of delivery so should be removed from the 15 year supply.
453	Site 919 (New Brighton Rugby Club, Moreton). No evidence of delivery so should be removed from the 15 year supply.
454	Site 1472 (Leasowe Recreation Centre and Playing Fields). No evidence of delivery so should be removed from the 15 year supply.
455	Site 418 (Former Waste Transfer, Wallasey). No evidence of delivery so should be removed from the 15 year supply.
456	Site 564 (Former Stone Manganese Marine, Seacombe). No evidence of delivery so should be removed from the 15 year supply.
457	Site 949 (Land at East Street, Seacombe). No evidence of delivery so should be removed from the 15 year supply.
458	Site 1320 (Land Fronting Carr Bridge Road, Woodchurch). No evidence of delivery so should be removed from the 15 year supply.
459	Site 1511 (Norton Court, 160 Borough Road). No evidence of delivery so should be removed from the 15 year supply.
467	Site 1397 (Land at Hargrave Avenue). Assessment may need to be revisited to ensure consistency with other sites designated as Urban Greenspace.
616	Site 693 (Upton Cricket Club, Upton). Especially concerned about the loss of Upton Cricket Club.
622	Site 692 (Land at Moreton Road). Concerned about the identified wooded area in Moreton Road, which should be retained as it is.
649	Site 635 (Land Adjacent to Yew Tree Farm). The inclusion of the site is misleading when the site may not receive planning permission because of other policy constraints which prohibit such development. Therefore object to inclusion as there is no likelihood, from a planning point of view, that this would be allowed.
650	Site 989 (Car Park at Kingdom Hall, School Lane). The inclusion of the site is misleading when the site may not receive planning permission because of other policy constraints which prohibit such development. Therefore object to inclusion as there is no likelihood, from a planning point of view, that this would be allowed.
651	Site 1724 (Land at Croft Retail Park, Caldbeck Road) This site is inappropriate for housing. It would contravene the Council's land designation policy.

ID	Summary of Comments Received
652	Site 1727 (Land at Riverbank Road, Bromborough) This site is inappropriate for housing. It would contravene the Council's land designation policy.
653	Site 1729 (Bowling Green, Old Court House Road) This site is inappropriate for housing. It would contravene the Council's land designation and would affect Bromborough Pool Conservation Area and bowling green, which is still in use.
654	Site 1895 (Land and Marine, Dock Road North). This site is inappropriate for housing. It would contravene the Council's land designation.
655	Site 1896 (Plant Hire Depot, Dock Road North) This site is inappropriate for housing. It would contravene the Council's land designation.
656	Site 1897 (Vehicle Compound, Dock Road South) This site is inappropriate for housing. It would contravene the Council's land designation.

Comments on Alternative Supply Options - General Comments

ID	Summary of Comments Received
029	The loss of employment land or open space to meet a significant proportion of the Council's shortfall is likely to have negative sustainability impacts.
030	Higher densities and mixed use town centre schemes could make a contribution but viability will need to be considered.
062	The security of food supply does not feature strongly as an issue in the documents and must be given some weight where future housing need and the pressure to release land for development is being considered.
093	Support the review of the SHLAA to review constrained to assess whether they could be overcome more quickly to bring sites forward sooner but concerned that there is no detail on how or when this review will take place.
109	The Council must plan positively to enable development to meet identified need and should make every effort to meet the OAN in full within the Borough boundary where this can be achieved by sustainable development.
166	More emphasis must be given to bringing empty properties back into use.
171	Re-designating the status of open spaces would be totally unacceptable for informal open spaces, Green Belt and conservation sites for wildlife.
172	It is paramount that the potential housing needs do not diminish the value of Wirral as a "Tourism Peninsula".
173	Building should not be considered anywhere near Port Causeway. The area is already swamped by Croft Retail Park, an unnecessary Aldi and a huge housing estate, in addition to facilities like the refuse bin depot and fire/ambulance station.
219	Would welcome development that incorporates sustainable design and construction and shows both adaption to and reduction in contribution to climate change.
230	The alternative options in paragraph 82 of the Council's Cabinet Report may provide some additional housing but would not sufficiently meet the shortfall in supply. There is insufficient employment land to address the shortfall; high-density residential-led town centre development of significant scale is largely unviable in Wirral; Liverpool and Cheshire West and Chester are unlikely to be able to accommodate some of Wirral's housing need; and Wirral may be asked to accommodate the housing requirement of other authorities following the Liverpool City Region SHELMA.
295	Increasing housing delivery on employment sites seem unworkable, as there is currently a shortfall of employment land in Wirral and employment land requirements assessed as part of the Liverpool City Region SHELMA may not be available for some time.

ID	Summary of Comments Received
296	Delivery within mixed-use town centre schemes has not been evidenced and developing open spaces would be unlikely to deliver the scale of housing needed and would reduce amenity standards for residents.
297	Delivery in other Local Authorities is unlikely to be practical, as the key districts of Liverpool and Cheshire West and Chester have confirmed they are unlikely to be able to accommodate any of Wirral's need.
348	Partially funded, low-cost-entry housing is a distortion in the housing market. Similar schemes in the past have been of more interest to investors who will wait until they can be sold at market prices.
349	The low-price sale of existing properties needing renovation seems to have been very effective in re-establishing viable neighbourhoods, does not impose planning blight on open spaces or encourage land banking. The Council should have the ability to influence urban renovations.
403	Not confident that housing land supply in Knowsley could be demonstrated to practically meet needs arising in Wirral given the distance between the two Boroughs; the relatively low migration and commuting links; and the different housing offers in each Borough.
420	Concerned about the number of employment sites included in the housing land supply, when the Wirral Employment Land and Premises Study Refresh 2012 shows a shortfall in employment land.
492	As many period properties as possible should be retained. New homes are not as well built and not as attractive.
493 497 555	Use brown belt land.
527	Don't believe that there has been enough investigation of the plethora of 'brownfield' and other similar sites in Wirral. The continued obsession with allowing planning permissions on 'green-belt' and in rural areas will only end when there is none left to build on! Has anyone thought about the flood risk in certain areas?
531	Consider existing empty dwellings. There is a partially completed house next to me that has remained empty for 20 years. More family-sized households could be accommodated if fit older people had smaller houses or bungalows to move in to. Why not do an audit of empty properties, such as flats above shops or businesses, to see if any more empty dwellings can be freed up You could also consider whether businesses could move towards more suitable premises by offering an incentive if it freed up land for houses or flats.
537	Some existing housing stock, identified in the report as less desirable for the future, such as terraced properties, could be sympathetically converted rather than building new. This would retain the character of areas whilst introducing modern features, a blend of old and new.
540	No other sites identified.
541	Housing supply and growth should reflect locations where jobs and economic growth is most likely to be focused. Brown field sites should be used, wherever possible, over and above green land.
543	There are other sites that could be used (none are specified).
547	There are numerous brownfield sites in Wirral which can be sympathetically developed but which are currently occupied by derelict buildings which the Council seems unable or unwilling to demolish.
550	I find the SHLAA very alarming and upsetting. Especially concerned about development in the more rural areas, such as Landican, Barnston, Brimstage.
576	Use vacant sites that are not designated as Green Belt.
582	Concerned about the impact of further development on Eastham Village

ID	Summary of Comments Received
603	These could easily be built, for the most part, on existing inner-city/ docklands sites without impacting too detrimentally on 'green-belt' areas.
606	Trust the existing terraced stock in need of repair will be upgraded and modernised rather than demolished, where possible? A 3-bed terrace could, for example, be converted to a 2-bed starter home with decent bathroom facilities.
615	Especially concerned about any loss of sports grounds.
617	Upton has suffered too much already from overdevelopment and has lost its village identity.
618	In favour of development in brown field sites.
619	Not in favour of development on any agricultural or grazing land.
623	Against any further development around Phoenix House, at the top of Ford Hill.
624	Do not have any sites to suggest for future development.
631	The Green Belt must take priority. Conservation Areas and Green Belt must be worked around.
632	Disagree as to the areas proposed. Have 'brownfield' sites really been taken into consideration, as has been the case in other areas?
639	Hope that conversions are considered as an alternative to new builds to conserve character and original architectural features.

Comments on Alternative Supply Options - Site Specific Suggestions

ID	Summary of Comments Received
379	If remaining businesses at New Ferry Town Centre could be helped to cluster close together a critical mass of shopping could re-emerge. The largely derelict shops on New Chester Road, between Woodhead Street and Bebington Road, could then be converted/ rebuilt as housing.
504	The Ten Streets Regeneration Scheme, in Birkenhead, is still undeveloped after at least 5 years and could be tastefully developed, with a link to the dock regeneration area behind it, to make it a desirable place to live.
509	Acre Lane.
514	The proposal for an International Trade Centre should be scrapped and the derelict dockland and adjoining land used for house building.
528	There are many 'waste' areas in Birkenhead and throughout Wirral, such as the docklands area around Beaufort Road/ North End. Similar areas have been very successfully renewed in other parts of the country.
546	Vale Park is less of a facility, more of a nuisance to residents and maybe could be developed into higher and medium level residences.
551	Land on way to Moreton Shore from the railway station.
566	Docks along the North-West coast.
571	Hawthorne Grove/ Wheatland Lane, Seacombe there is currently wasteland owned by Magenta housing (they are hoping Peel Holdings will buy it). There used to be three-storey flats on this site.
597	The land north of Greasby, included in the previous 1974 Hoylake Expansion Study, could be considered for housing.
598	Land south of the railway between Meols and Hoylake could be considered for housing, as part of the wider Golf Resort.
599	Land around Clatterbridge could be considered for housing. There is scope for putting together a major new village making use of the vacant land around the hospital.

ID	Summary of Comments Received
600	Suggest looking at developing the villages to make them more sustainable, such as allowing scope for local facilities and improved transport links. Suggest Thornton Hough, Storeton, Saughall Massie, Thurstaston and Brimstage.
609	There is a lot of spare land around Corporation Rd/Beaufort Rd in Birkenhead.
610	Land currently for sale opposite Birkenhead Park Station.
611	High density high rise to replace poor 1930s/1940s housing stock in Rock Ferry.
612	High density high rise to replace poor 1930s/1940s housing stock in Wallasey.
613	High density high rise to replace poor 1930s/1940s housing stock in Tranmere.
614	There is a small plot in New Street, Seacombe which is just now wasteland.
621	In favour of development on brown field sites such as Cadbury's, in Moreton.
633	There are many 'waste' areas in Birkenhead and throughout Wirral, such as the area off Conway Street behind the remains of the old General Hospital.
641	Land behind Glenburn school.
643	The row of derelict shops on Borough Road which have been awaiting demolition for over fifty years.

Capacity in Adjoining Districts

ID	Summary of Comments Received
060	It would not be appropriate to identify additional land within Cheshire West and Chester to meet Wirral's housing needs, given that each Housing Market Area is distinct and the release of further sites in Cheshire West and Chester would require a review of the Local Plan (Part One) and could undermine the delivery of key strategic sites in Cheshire West and Chester.
402	To ensure sufficient housing land supply the recently adopted Knowsley Local Plan Core Strategy allocates several former Green Belt Sites for development. There is consequently minimal "headroom" of supply and additional housing could only be accommodated in Knowsley through the further release of land currently designated as Green Belt.
409	Sefton Council has identified the release of land for over 11,500 dwellings as part of the Sefton Local Plan, which is nearing adoption. 4,500 are within the Green Belt, which is heavily constrained. Sefton Council is not therefore in a position to be able to meet any housing needs arising in Wirral.
464	The environmental and viability constraints facing sites in Liverpool, together with the potential additional requirement suggested in new Government projections, mean that Liverpool City Council does not consider it either possible or appropriate to meet the housing shortfall identified by Wirral.
579	While Wirral and West Lancashire are often grouped together within the same Housing Market Area, there are few direct links between the boroughs, except through Liverpool. It would not therefore necessarily be appropriate for West Lancashire to meet any of Wirral's housing need.

Oppose Development in the Green Belt

ID	Summary of Comments Received
105	Disagree with the analysis in the SHMA. Wirral does not have the capacity to accommodate 15,000 - 20,000 new homes. Among Wirral's principal assets are its open space, Green Belt and countryside. The peninsula has suffered enough overdevelopment already. Such an intrusion into these spaces would spoil Wirral forever.

ID	Summary of Comments Received
167	No reference is made to the Hoylake Golf Resort. The building of housing in the area of the Hoylake Golf Resort would be inappropriate and it is questionable whether the ground conditions would be suitable for development.
168	Meeting housing needs must not be at the cost of losing or damaging the Green Belt, other green spaces and Conservation Areas.
254	It is important that the Council acknowledges all restricted land for the purpose of identifying its OAN and then plans accordingly, delivering adequate housing within the parameters of restricted land.
265	The OAN in the SHMA is too ambitious and improbable. The Council cannot justify release of Green Belt land simply because it has growth aspirations.
314	The 'very special circumstances' necessary to justify development in the Green Belt cannot possibly be demonstrated whilst a regeneration opportunity on the scale of Wirral Waters remains unfulfilled to any significant extent. Directing development to greenfield sites, especially Green Belt sites, will only reduce the likelihood of Wirral Waters being brought forward.
343	The loss of valuable open green spaces would risk impacting on the tourism and visitor sector business, especially when there are opportunities to redevelop urban areas.
472	Do not support any development on Green Belt land. As more and more open spaces are developed for housing and other purposes, Green Belt will become increasingly important in meeting its purpose as stated in section 9 of the National Planning Policy Framework "Protecting Green Belt land" (paragraphs 80 and 87). Especially so with flood risk areas in Flood Zones 2 & 3, adjacent to Conservation Areas, supporting habitats, SBIs and archaeological features.
476	Totally against any building in the Green Belt. As more space is taken by the houses that the Borough needs and Government demand, Green Belt becomes more valuable to the whole community as an amenity for society's needs.
491	The existence of the list of Green Belt sites in the SHLAA and the mention of a process of formal review of the Green Belt as a whole is laying down a marker for the future destruction of the only Green Belt outside the London area - a Green Belt which creates the Wirral loved by its residents - if not by its Council officials.
503	No alternative sites are suggested. Wirral is supposed to be "a pleasant place to grow". If any or most of the Green Belt land identified is used for building, the peninsula will be unrecognisable and the poorer for it. Visitors who come to us love the openness of Wirral and the views around the different villages and towns. They, like us, appreciate the fact that there are open spaces and not mass housing. Object to any building on the Green Belt.
505	The criteria beg the answer but we do not believe that violation of the Green Belt should be part of the solution. 'Exceptional circumstances' have not been proved.
513	Greenbelt land is meant to be a buffer between one built-up urban area and another. Also to limit urban sprawl.
518	Bewildered as to why you would be thinking of building on Green Belt as this is a necessary space between communities to be used and enjoyed by all.
521	No more building on Green Belt.
525	There is too much emphasis on 'green-belt' and adjoining areas.
530	We don't want our green Wirral to be covered in concrete.
539	Hope that preservation of green belt will be respected.
552	Please do not build on the green belt. It is there for a purpose. Some of the areas highlighted are on flood plains. This is so short sighted and depressing beyond belief.

ID	Summary of Comments Received
553	Please consider brown field sites. They are more expensive to develop but this cannot be allowed to influence the decision to build on the green belt. What makes Wirral a nice place to live will disappear under housing. A derisory number of these houses will be affordable, not enough to justify ruining the Wirral, but sufficient to ensure pockets will be lined.
554	New building on green field, Green Belt sites should not be considered. Wirral green spaces are precious.
572 573	Green Belt land should not be used.
574	Extra housing is required but it must not be built on green belt land.
575	Green belt must not be used.
583	Concerned about the impact of the release of Green Belt land at other sites within Eastham Ward.
625	To build on Green Belt and other open space, which gives Wirral its beauty and attractiveness would ruin Wirral forever.
634	Absolutely no green field sites should be used, only brownfield sites where available.

Support Development in the Green Belt

ID	Summary of Comments Received
032	The identification of Green Belt sites is the only feasible and viable solution to the housing shortfall.
033	The Council should undertake an assessment of Green Belt sites, in line with the National Planning Policy Framework, to identify sites which are deliverable in the short and long term to meet needs.
034	The Council should amend its current timetable for plan preparation to accommodate Green Belt review, which should include a further opportunity to comment on preferred sites before consulting on its pre-submission Local Plan.
044	The Council's inability to provide a five-year supply of housing land shows a need to identify more land over that already identified, to bring sites forward from later in the plan period. A full review of the Green Belt should be undertaken, as part of the process of preparing the Local Plan.
045	If the requirement for additional housing is identified in the Core Strategy Local Plan and is followed through with a review of the Green Belt, this would prevent speculative development in the light of the Council's lack of a five year supply.
052 064 070	The Council must apply the OAN as a minimum and should allocate or safeguard sufficient land the meet needs. The plan must be flexible in the short, medium and long term through the release of Green Belt Land.
055 067 073	The Council must undertake a full Green Belt review to support the release of Green Belt land for development.
083 321	Given the geographical restrictions, the Council should consider sites within the Green Belt to meet needs, through a Green Belt review.
092 330	Green field Green Belt sites should be categorised within the context of the purposes of the Green Belt. Sites which do not fulfil the purposes could come forward for development following a Green Belt Review.
124	There is a risk that by using land within the existing urban boundary not currently identified for housing, the Council will generate a less sustainable outcome than by using greenfield sites on land currently within the Green Belt.

ID	Summary of Comments Received
125	The Council has a strong case for exceptional circumstances to justify a change to Green Belt boundaries based on the need to meet its OAN within the Housing Market Area. Developing housing on land designated for employment and community or recreational purposes uses would be contrary to the Council's Vision and national policy; opportunities to provide for growth within the urban area have been virtually exhausted; even if Wirral Waters were to come forward at a faster pace than envisaged, it would not fully meet housing needs due to the nature and location of development; and the release of Green Belt would support the delivery of affordable housing and aspirational homes and would be attractive to the market.
181 199 239	Consider that the delivery of a considerable boost to housing delivery across Wirral in a sustainable manner satisfies the exception test.
191 201	Support the principle of undertaking a Green Belt review to identify additional allocations to be made across the Borough, including Meols, Heswall and Hoylake, to meet needs now and in the future (including for the next Plan period).
223	Given the Borough's insufficient land supply, achieving housing delivery to meet identified need would require significant policy intervention and the identification of additional deliverable sites, through an immediate Green Belt review through the preparation of the Local Plan. This would ensure the identification of sites capable of delivering development early in the Plan period.
241	Support the principle of undertaking a Green Belt review to identify additional allocations to be made across the Borough, including around the settlements of Bebington (including for the next Plan period)
283	Believe there is clear empirical evidence to demonstrate the very special circumstances necessary to review the Borough's Green Belt boundary.
299	Release of Green Belt sites appears to be the only viable option to deliver market and affordable housing at the scale needed to meet needs. The combination of insufficient sites along with chronic under-delivery and acute affordable need clearly provides the 'exceptional circumstances' required to alter the existing Green Belt.
300	Any formal Green Belt review will need to reconsider all Green Belt parcels against the five purposes of Green Belt set out in paragraph 80 of the National Planning Policy Framework, to determine which are suitable for release, as part of a SHLAA Update. This Green Belt review may be required to release land for 9,000 homes.
305	It is clear that the Council needs to consider the release of Green Belt land to accommodate housing development.
412	It is widely accepted that Wirral is already unable to demonstrate a deliverable five-year housing land supply against the historic dwelling target of 500 dwellings per annum. The dwelling target is set to increase significantly and there is realistically no way that these needs can be met in full without the careful release of some Green Belt land in sustainable locations across all settlements within the Borough. There is a compelling and urgent need for a comprehensive review of the Green Belt.
462	The Council must assess Green Belt for housing allocations as part of the Local Plan, to identify Green Belt sites which are deliverable in the short and long term to meet identified housing needs.

Comments on the Future Spatial Strategy

ID	Summary of Comments Received
111	The Council should recognise that it will be possible to increase delivery of affordable housing significantly beyond historic rates by taking a more positive approach to the use of greenfield sites, where land values are higher.

ID	Summary of Comments Received
175 193 233	Suggest that the Council increases the amount of housing to be provided on larger sites (above the affordable housing threshold) to support the delivery of affordable housing.
179 197 237	Local Plan should be positively worded to show intent for exceeding minimum housing targets, consistent with the overall evidence for Wirral and the wider sub-region.
180 198 238	To increase the certainty of housing delivery through the Local Plan, the Local Plan should be the mechanism for allocating land rather than waiting for a site-specific document. Significant weight should be given to the deliverability of development; flexibility should be built into the supply; the constraints to the delivery of brownfield sites should be taken into consideration; and the viability of providing affordable housing should be factored in.
210	It will be important to ensure that suitable flexibility is built into the projections and that there is a phased approach to land release so that the most suitable sites are released before less suitable sites (such as those currently designated as Green Belt). If it is required to allocate less suitable sites, these should not be released until towards the end of the Plan period, when there will be better and more up-to-date information in respect of housing requirements.
228	Much of the identified housing land supply is within existing urban areas on previously developed land. Such sites are not always considered viable or attractive to developers.
261	Recent evidence has shown developers are prone to land banking sites and drip-feeding housing units onto the market to achieve the highest returns. They are also known to hold back the implementation of planning permissions to trigger the release of further greenfield land never intended for development. Developers must be required to build out planning permissions in a timely manner or face some kind of sanction.
315	If the Green Belt needs to be revised in order to facilitate appropriate development, it is clear that a sequential approach to the identification of sites should be adopted, focusing on the potential of land adjacent to the principal urban areas which are the most sustainable locations and not on settlements such as Thornton Hough, Raby, Raby Mere, Brimstage and Storeton.
354	Of key importance to preserving the openness and green spaces in Wirral is the priority for land release. Will the Council commit to a 'brownfield first' policy, preserving open spaces and Green Belt?
397	Hope that suitable brownfield sites would be available, in the right locations, to enable the Council to reach its target without having to encroach on Green Belt land, Urban Greenspace or playing fields.
463	The Council should amend its current timetable for plan preparation to include a further opportunity to comment on preferred sites before consulting on its pre-submission Local Plan.
523	Stop using housing to kick-start the economy or to get more money in your own coffers.
560	It is clear that large swathes of land have been identified in areas that would generate more Council Tax, such as Greasby and Irby. If many of them come to fruition, the identity of these areas would be changed.
561	Sites should be chosen where there is an infrastructure to support the needs of an expanding community. A disproportionate number of sites are identified in West Wirral, which would not benefit all members of the Wirral community.
565	Wirral attracts residents based on its mix of urban and green spaces. This needs to be preserved. Future generations will be outraged by any decisions to build on the remaining green space.
640	Hope that social factors are considered such as retail, health, education & leisure facilities.

ID	Summary of Comments Received
646	No more building on land that provides space and amenities for local residents. Build only on suitable brownfield sites. Wirral is overcrowded. I can hardly drive out of my path. The Council is there to serve the community, not itself or the Government although both these organisations would like us all to be jammed together like sardines.

Other Comments

ID	Summary of Comments Received
061	Cheshire West and Chester Council would like to be informed on how any potential future review of the Green Belt might be taken forward, to allow it to consider the impact on the North Cheshire Green Belt, including the importance of maintaining strategic gaps between settlements.
253	It is important that the Local Plan represents the ambitions of the local electorate when planning for Wirral's future land use.
559	I feel the desire for income generated by the Government Grant for building new homes and the Council Tax on newly built homes far outweighs the demand for housing.

C. COMMENTS ON THE CONSULTATION PROCESS

ID	Summary of Comments Received
108	The SHMA is particularly difficult to read and inaccessible to most Wirral residents.
202	SHMA is complex and contains much housing-based jargon. It would be helpful for readers to see a simple summary of the assumptions which feature throughout the report, with the impact on infill and Green Belt under two scenarios clearly shown.
203	It is hard work to link all of the annexes to the text, to see the impact on villages and Green Belt.
356 644	These long and complex documents have proved difficult for non-specialists to understand. Grouping the maps into townships or wards would have made it easier to find sites and the maps could be marked with the SHLAA category.
475	I do not know how best to complete this survey. Is this an attempt to prevent meaningful consultation? The questions are so difficult to answer and the documents so complex as to deter public opinion. The five questions are not understood by residents who will be impacted by the welter of housing proposed in the SHLAA.
478	The results obtained from this survey are probably impossible to analyse properly and, as we know, Council is not good at analysing its surveys.
484	Almost impenetrable. Surely a summary could have been provided for residents.
489	This set of questions represents an attempt to prevent meaningful consultation rather than to elicit public opinion. The five questions evade the issues which are actually understood and felt by people, to do with the impact on their lives by the rash of housing proposed in the SHLAA.
498	This document is far too lengthy and complicated to process. Doubtless, this is what you were hoping for so that no one would reply.
515	A clear summary (not a lengthy document) would help current residents decide whether there is any point to increasing housing.
520	Don't know how to reply. The survey was written by a consultancy, I assume to be understood by other professionals in that field. The lay man has no chance of understanding its contents and therefore, on that point alone, your public consultation has failed.
522	Is this an exam question?
544	These reports are incredibly technical and dense. They are not written for the lay reader but for a specialist housing audience. As technical reports, they are not suitable as consultation documents and the consultation questions were pitched entirely wrongly for ordinary Wirral residents with an interest in housing related issues.
556	Far too much detailed information is provided within the report to be able to make a decision.
567	Too long to read, need a shorter but important assessment.
568	The whole assessment needs to be shorter as people won't read it.
570	This is way too long to read and digest and only a handful of people will read it. It needs to be a lot shorter and in 'Joe public's' English. The Council are probably hoping that not many people will read it, so that when people object you can say it was there in black and white for you to read.
581	Concern at the leading questions asked in the on-line survey which can only allow a limited a predefined response.
607	Very detailed. Doubt many people will read it in detail.
635	The information is very complex for a lay person.
637	I do not have time to read every word.
642	It is difficult for a member of the public to objectively comment on the numbers in the analysis.

ID	Summary of Comments Received
645	Are you joking? Most people won't wade through this lot.

Appendix 1 – List of People and Organisations Notified

A Power	Mr P Sergeant
A2 Architects	Mr P Singleton
Abacus Organics	Mr P Smith
Acorn Picture Framing	Mr P SurrIDGE
Ainsley Gommon Architects	Mr P Swift
Allerton Trust	Mr P Wharmby
Alpha Homes	Mr P William
Alyn Nicholls & Associates	Mr Pleded
AMEC E&I Ltd	Mr Prandle
Anchor Trust	Mr Q McCormick
Ancient Monuments Society	Mr Quaille
Anna May Couture	Mr R Braithwaite
Arcus Consultancy Services Ltd	Mr R Cashin
Arriva North West Limited	Mr R England
Athertons	Mr R Gronow
Avantgarde	Mr R Hardman
Aylward Town Planning	Mr R Hill
B SKY B Telecommunications	Mr R J Wood
B Wagstaff	Mr R L Shelbourne
Babbs Consulting	Mr R Macoy
Bargain Booze	Mr R Magee
Barnston CAAC	Mr R Miles
Barnston Conservation Society	Mr R Spence
Barnston Womens Institute	Mr R Wallace
Barratt Homes Manchester	Mr R Watson
Barton Willmore	Mr R Wild
BE Group	Mr R Williams
Beechwood & Ballantyne EMB Ltd	Mr R Williams
Beechwood Community Association	Mr Reade
Bell Developments	Mr Rowland
Bell Ingram	Mr S Ball
Bellway Homes	Mr S Bradley
Berkley Partnership	Mr S Briscoe
Bett Limited	Mr S Davies
Bidston Moss Steering Group	Mr S Donnelly
Bidston Preservation Trust	Mr S Duffy
Bidston Residents Association	Mr S Dyke
Bidston Village CAAC	Mr S Dyson
Biffa Waste Services	Mr S Farrell
Birkenhead & Tranmere Neighbourhood Planning Forum	Mr S Fowler
Birkenhead Building & Roofing Supplies	Mr S King
Birkenhead First	Mr S Lindsey
Birkenhead History Society	Mr S Lomax

Report of Further Consultation on Housing Needs and Land Supply

Birkenhead Market Tenants Association	Mr S Lord
Birkenhead YMCA	Mr S Morris
Black Macadam	Mr S Murphy
Bloor Homes North West	Mr S Palin
Blue Sky Planning Limited	Mr S Rowe
Bluemantle	Mr S Wigg
BNP Paribas Real Estate	Mr Spencer
Border Estates	Mr T Clark
Bovis Homes Limited	Mr T Corkhill
Brady Chartered Surveyors	Mr T Duffy
Braithwaite Associates	Mr T Healey
Bride Hall Holdings	Mr T Hutchinson
Bridgewater Meeting Room Trust	Mr T Kirkham
Bridscape	Mr T Lyon
Bristol-Myers Squibb	Mr T Maycox
British Aerospace	Mr T Parry
British Telecommunications	Mr T Robert
Broadway Malyan Planning	Mr T Roberts
Brock Plc	Mr T Rock
Brockway Dunn	Mr T Southern
Brodies Solicitors	Mr T Spencer
Bromborough Pool Residents Association	Mr T Tarr
Bromborough Society	Mr V Page
Brookhouse Group	Mr V Williams
Bruton Knowles	Mr Van Ingen
Burton Property	Mr W Conroy
Burtens Biscuit Company	Mr W Cushion
C A Planning	Mr W Eastwood
C French	Mr W Jones
C Watson	Mr W Mitchel
C Rive	Mr W O'Dowd
Caldy CAAC	Mr Watts
Cammell Laird Ship Repairs	Mr Wilkinson
Campaign for Real Ale	Mrs B Royce
Canal and River Trust	Mrs C Edwards
Carter Jonas	Mrs C Tilley
Cass Associates	Mrs Duncan
CBRE Planning and Development	Mrs E M Hale
CDP Limited	Mrs G Nicholas
CDS Housing	Mrs G Wollers
Central Liscard Area Residents Association	Mrs J Andrews
CgMs Consulting	Mrs J Beastall
Chart Plan (2004) Ltd	Mrs J Casey
Cherish the Bride	Mrs J Hall
Cheshire & Wirral Partnership NHS Trust	Mrs J M Smith
Cheshire Association of Local Councils	Mrs Johnson

Report of Further Consultation on Housing Needs and Land Supply

Cheshire Gardens Trust	Mrs K M Ives
Cheshire Local Nature Partnership	Mrs Lewis
Cheshire Police & Crime Commissioner	Mrs M Callaghan
Cheshire RIGS Group	Mrs M Hall
Cheshire West & Chester Council	Mrs N L Ratcliff
Cheshire Wildlife Trust	Mrs S Charlesworth
China Plate Farm	Mrs S Shaw
Chris Thomas Limited	Mrs Testo
Church Commissioners	Mrs V Doodson
Civil Aviation Authority	Ms A Billington
Claire House Children's Hospice	Ms A Byrne
Clatterbridge Oncology NHS Trust	Ms A Crompton
Cloughton Community Group	Ms A Ellis-Clark
Cliff Walsingham & Company	Ms A Fryer-Harris
Clifton Park Residents Group	Ms A Furness
Clive Watkin Partnership	Ms A Gillett
CLM Ltd	Ms A Godbehere
Coal Authority	Ms A Hardman
Colliers International	Ms A Heron
Community Action Wirral	Ms A Holcroft
Compendium Group (Riverside)	Ms A MacKinnon
Contour Homes	Ms A Moore
Co-operative Estates	Ms A Parker
Corporate Property Solutions	Ms A Rees
Cosmopolitan Housing	Ms A Rust
Council for British Archaeology	Ms A Scott
Country Land & Business Association	Ms A Shaw
Countryside Properties	Ms A Short
Countrywide Properties	Ms A Smith
CPG Property Developments	Ms A Stirling
Crown Estate	Ms A Tornerup
Cycling Project	Ms A Van Ommen
D J Cooke & Company	Ms A Walton
D Morgan	Ms A Wilkinson
D S & E J Webster	Ms A Wood
D2 Planning	Ms Ascott
Dalton Warner Davies	Ms B Aspinall
Daly International	Ms B Case
De Pol Associates	Ms B Chabeaux
Dee Estuary Conservation Group	Ms B Gittoes
Defence Infrastructure Organisation	Ms B Greenwood
Deloitte LLP	Ms B Harrison
Denis Wilson Partnership	Ms B Howard
Denton Clark	Ms B Kilby
Design Planning Developments	Ms B Lamb
Devonshire Park Residents Association	Ms B Meynell
Dickinson Dees	Ms B Newey
Dickman Associates Ltd	Ms B Singleton

Report of Further Consultation on Housing Needs and Land Supply

Diocese of Chester	Ms C Barrett
Diocese of Shrewsbury	Ms C Byrne
Disabled Motorists Federation	Ms C Evans
Dixon Webb	Ms C Macleod
DJF Developments	Ms C Milton
DPDS Consulting	Ms C Mitchell
DPP	Ms C Moxham
Dr F Bloore	Ms C O'Connell
Dr K Singh	Ms C Parry
Dr M A Turpin	Ms C Schorah
Dr M Baker-Schommer	Ms C Sherlock
Dr M Day	Ms C Singleton
Dr Macbeath	Ms C Smyth
Dr N M Jedynakiewicz	Ms C Walton
Dr R Dockrell	Ms D Bevan
Dr R Wilkie	Ms D Buxton
Drivers Jonas Deloitte	Ms D Cameron
DTZ	Ms D Crofts
Dwr Cymru Welsh Water	Ms D Hind
E M Enterprises	Ms D Hughes
Eastham Village Preservation Association	Ms D Hurst
Edmund Kirby	Ms D Maxwell
Edward Landor Associates	Ms D Ralph
Edward Taylor MRTPI, MCD, MA	Ms D Simmonds
Elan Homes	Ms D Toony
Eleanor Road Residents Association	Ms E Akerstrom
Emerson Group	Ms E Bastow
Emery Planning	Ms E Bondar
Energy Projects Plus	Ms E Brabin
English Churches	Ms E Campbell
Entec UK Ltd	Ms E Dromgoole
Environment Agency	Ms E Fairbanks
Envision UK Partnership	Ms E Green
Equfund (IPS) Ltd	Ms E Hall
Eric Wright Group	Ms E Hankin
Everything Everywhere	Ms E Harradine
Fairhurst	Ms E Hughes
Family Housing Association	Ms E Leatherbarrow
FFT Planning	Ms E McCormick
Fire Safety Command (Wirral District)	Ms E Nicholson
Fisher German LLP	Ms E Nolan
Flintshire County Council	Ms E Thornton
Footprint Property Services	Ms E Turner
Forestry Commission	Ms E Wright
Forster and Company	Ms F Davidson
Fort Perch Rock	Ms F Pairman
Forum Housing	Ms Foster

Report of Further Consultation on Housing Needs and Land Supply

Frankby CAAC	Ms G Ching
Friends of Arno and Oxton Fields	Ms G Creek
Friends of Arrowe Country Park	Ms G Edge
Friends of Ashton Park	Ms G Lowther
Friends of Bidston Hill	Ms G Norris
Friends of Birkenhead Park	Ms G Roberts
Friends of Central Park	Ms G Roberts
Friends of Coronation Gardens	Ms G Roberts
Friends of Dibbinsdale	Ms Gordon
Friends of Eastham Country Park	Ms H Butler
Friends of Flaybrick	Ms H Ellis
Friends of Gilroy Nature Conservation Society	Ms H Gill
Friends of Grange Community Park	Ms H Greig
Friends of Greasby Outdoor Activity Leisure	Ms H Howard
Friends of Harrison Park	Ms H M Jones
Friends of Higher Bebington Park	Ms H Moon
Friends of Hilbre Nature Reserve	Ms H Skinner
Friends of Hoylake & Meols Open Spaces	Ms H Van Marle
Friends of Leasowe Lighthouse	Ms H Walsh
Friends of Meols Park	Ms H Wilcox
Friends of North Wirral Coastal Park	Ms I Toner
Friends of Quarry Recreation Ground	Ms I Whalley
Friends of Rake Lane Cemetery	Ms J Allen
Friends of Royden Park	Ms J Anderson
Friends of Storeton Woods	Ms J Arkell
Friends of Tam O'Shanter Urban Farm	Ms J Astle
Friends of the Tranmere Parks	Ms J Benfield
Friends of Vale Park	Ms J Bird
Friends of Victoria Gardens	Ms J Bryson
Friends of Warwick Park	Ms J Casey
Friends of Wirral Country Park	Ms J Clarke
Fusion Online Limited	Ms J Dackombe
FWT	Ms J Flexney
Gardens Trust	Ms J Gammon
Garry Usherwood Associates	Ms J Henshaw
Gary Strother Builders	Ms J Hodgson
Gauchwin Group	Ms J Holdgate
General Aviation Awareness Council	Ms J Hughes
Georgian Group	Ms J Hunter
Gerald Eve	Ms J Hutcheson
Gilling Dod Architects	Ms J Hutcheson
Gilmore Developments Limited	Ms J Jackson
Gladman Developments	Ms J Lennox
Goodwin Planning Services	Ms J Lomax
Groundwork Cheshire	Ms J M Stafford
GVA	Ms J Mackay
H M Atherton	Ms J Mcaloon
Halcrow Consulting Business Group	Ms J McLaughlin

Report of Further Consultation on Housing Needs and Land Supply

Hallam Land Management Ltd	Ms J Murphy
Halton Council	Ms J Paul
Harlor Homes	Ms J Preston
Hawarden Airport (Airbus)	Ms J Smith
Health & Safety Executive	Ms J Taylor
Healthy Waterways Trust	Ms J Ugonna
Heaton Planning	Ms K Blowfield
Henry Boot Developments	Ms K Doleman
Heswall & District Business Association	Ms K Douglass
Heswall Society	Ms K Fowler
Hickling Gray Associates	Ms K Franklin
Highways England	Ms K Green
Historic England	Ms K Griffiths
HM Coastguard	Ms K Head
Hollins Strategic Land	Ms K Lawrence
Home Builders Federation	Ms K Murphy
Homes and Communities Agency	Ms K Redfern
Hooton Park Trust	Ms K Robinson
Hourigan Connolly	Ms K Swainston
HOW Planning	Ms K Truman
Hoylake & District Civic Society	Ms K Valentine
Hoylake and Meols in Bloom	Ms K Vincent
Hoylake Business Network	Ms K Wright
Hoylake CAAC	Ms Kalil
Hoylake Village Life	Ms L Adams
Huw Evans Planning	Ms L Aldis
Hyatt Property	Ms L Anderson
Hylgar Properties	Ms L Gilmour
Ibigroup	Ms L Higgins
Indigo Planning	Ms L James
Inglewood Properties	Ms L Machray
Inshore Fisheries and Conservation Authority	Ms L McKechnie
Interprime	Ms L Morris
Involve Northwest	Ms L Murray
Irby Thurstaston & Pensby Amenity Society	Ms L Reith
Irish Community Care	Ms L Rutter
Irvin Consultants	Ms L Smith
J Barnard	Ms L Thomas
J Elliot	Ms L Triggs
J Foster	Ms L Williams
J Linger	Ms M Armitage
J Oxtan	Ms M Bintley
J10 Planning	Ms M Bowman
JASP Planning Consultancy	Ms M Costello Smith
John Millar UK Ltd	Ms M Haslam
Jones Lang LaSalle	Ms M Heighton
Joseph Smith Trust	Ms M Knowles

Report of Further Consultation on Housing Needs and Land Supply

JWPC Limited	Ms M McMahon
Karen & Emma's Childminding Services	Ms M Roberts
Keepmoat Homes	Ms M Robertson
Kemp & Kemp	Ms M Stroude
King Sturge	Ms M Timmins
Kings Lane Supporters Association	Ms M Vaughan
Kirkwells Town Planning	Ms M Wharton
Knight Frank	Ms M McDermott
Knowsley Council	Ms McNelis
L Masterman	Ms N Clark
Lairdsie Communities Trust	Ms N Daniels
Lambert Smith Hampton	Ms N Dowie
Lamont	Ms N Duncan
Land Planning Group	Ms N Norman
Land Projects UK Associates	Ms N Roberts
Landmark Information Group	Ms N Williams
Lattitude	Ms P Clothier
Lawn Tennis Association	Ms P Eve
Leasowe Community Association	Ms P F Elcock
Leasowe Community Homes	Ms P Jackson
Leasowe Development Trust	Ms P Joseph
Lees & Partners	Ms P Meredith Jones
Leith Planning	Ms P Soo
Leverhulme Estates	Ms P Vernon
Lex Northwest	Ms P Wild
Ling Warlow	Ms R Beazer
Liscard and Egremont Partnership	Ms R Bennett
Liverpool City Council	Ms R Chandler
Liverpool City Region LEP	Ms R Flynn
Liverpool Housing Trust	Ms R Hanton
Lucent Group	Ms R Kirkby
M C I Developments	Ms R Lancashire
M Graham	Ms R Murad
M J Carter Associates	Ms R O'Grady
M J Coventry	Ms R Roberts
Magazines Conservation Society	Ms R Saville
Magenta Living	Ms R Stenhouse
Malcolm Scott Consultants	Ms R Waterton
Manor Egremont Mast Action Group	Ms R Wootton
Manor Kingdom Central	Ms S Abbott
Marianthi Lainas	Ms S Armitage
Marine Lake Training	Ms S Barker
Marine Management Organisation	Ms S Barker
Maritime (Regenda Group)	Ms S Bland
Mason & Partners	Ms S Bonnet
Mason Owen Property Consultants	Ms S Boston
Matthews & Goodman	Ms S Bramley
McCormick Architecture	Ms S Briscoe

McDonalds Franchise Birkenhead	Ms S Brown
McDyre & Company	Ms S Butchart
McEwan Wallace	Ms S C Romaya
McGough Planning Consultants	Ms S Coast
Merepark Project Management	Ms S Colquhoun
Mersey Estuary Conservation Group	Ms S Dodd
Mersey Forest	Ms S Drew
Mersey Waste Holdings	Ms S Hood
Mersey Wharf (Victoria Group)	Ms S J Wall
Merseyside & West Cheshire Ramblers	Ms S Jackson
Merseyside & West Lancs Bat Group	Ms S Johnson
Merseyside Civic Society	Ms S Jones-Hoffman
Merseyside Cycling Campaign	Ms S Leather
Merseyside Environmental Advisory Service	Ms S Magee
Merseyside Environmental Trust	Ms S Newby
Merseyside Fire & Rescue Authority	Ms S Noyce
Merseyside Police & Crime Commissioner	Ms S Parker-Welch
Merseyside Recycling & Waste Authority	Ms S Powell
Merseytravel	Ms S Pownall-Jones
Methodist Church Property	Ms S Roberts
Metropolitan Resources	Ms S Roberts
Michael Cunningham Architects	Ms S Ross
Miller Homes	Ms S Sharples
Miller Town Planning	Ms S Smith
Miss J Marguerie	Ms S Stowe
Miss S Poole	Ms S Toal
Mitsubishi Electrical Europe	Ms S Wright
Morecrofts Solicitors	Ms T Fitzpatrick
Morris Homes	Ms T Forrester
Mountwood Society	Ms T Irving
Mr R Neale	Ms T Kellaway
Mr & Mrs J Davies	Ms T Roberts
Mr & Mrs A Pasterfield	Ms V A Ferris
Mr & Mrs Anderson	Ms V Boulton
Mr & Mrs Arnold	Ms V Clark
Mr & Mrs B & R Walsh	Ms V Coupe
Mr & Mrs D Gleave	Ms V Frost
Mr & Mrs D Povall	Ms V Henderson
Mr & Mrs E & B Bushell	Ms V Herdman
Mr & Mrs Edwards	Ms V Lodder
Mr & Mrs G Archibald	Ms V Myles
Mr & Mrs G J McLennan	Ms V P James
Mr & Mrs Hall	Ms V Wallace
Mr & Mrs J & C Thomas	Ms W Jones
Mr & Mrs J & H Wesenraft	Ms W Jones
Mr & Mrs J Hall	Ms Y Cullen
Mr & Mrs Jacques	Muir Associates
Mr & Mrs L & B Bell	Murray Planning Associates

Report of Further Consultation on Housing Needs and Land Supply

Mr & Mrs L & S Hurst	Muse Developments
Mr & Mrs M & A Hudson	Myles Parry Estates
Mr & Mrs M & N Davies	N Power Renewables
Mr & Mrs M Cook	Nathaniel Litchfield & Partners
Mr & Mrs Moore	National Air Traffic Services
Mr & Mrs N & M G Dyson	National Farmers Union
Mr & Mrs Neeson	National Federation of Gypsy Liaison Gps
Mr & Mrs PM & UR Weston	National Grid
Mr & Mrs Rome	NHS Commissioning Board
Mr & Mrs S & B Irving	National Museums Liverpool
Mr & Mrs T Sullivan	National Trust
Mr & Mrs W Cates	National Wind Power
Mr & Mrs Woods	Natural England
Mr A Burton	Natural Resources Wales
Mr A Clark	Nature Connected
Mr A Cooper	Neptune Developments
Mr A Corlett	Network Rail
Mr A Dodd	New Brighton BRAVO
Mr A Gale	New Brighton Community Association
Mr A Gellion	New Brighton Community Partnership
Mr A Green	New Brighton Environmentalists
Mr A Green	New Brighton Football Club
Mr A Housley	New Ferry & Rock Ferry Conservation Society
Mr A Jackson	New Ferry Regeneration Action Group
Mr A Kennaugh	NHS Cheshire, Warrington and Wirral
Mr A Kent	NHS Property Services
Mr A Love	NHS Trust Development Authority
Mr A McGarry	NHS Wirral
Mr A McKechnie	NJL Consulting
Mr A Nally	Norland
Mr A Noakes	Norman Street Residents and Tenants
Mr A Nuttall	North Birkenhead Development Trust
Mr A P McArdle	North Birkenhead Neighbourhood Forum
Mr A Royle	North Country Homes Group
Mr A Valentine	North West Ambulance Service
Mr Ashman	North West Commissioning Support Unit
Mr B Flint	North West Construction
Mr B Legan Dip TP DMS	Northern Trust
Mr B Murphy	NTL
Mr B Smythe	Nutexa Frictions
Mr Badenoch	NW Association of Sea Angling Clubs
Mr Brown	NW Baptist Association
Mr C Collins	NW Confederation of Passenger Transport
Mr C Draycott	Office of Rail Regulation
Mr C Fox	Overchurch Residents Association
Mr C Green	Oxton Society
Mr C M Brand	P Nigel & G Brierley

Report of Further Consultation on Housing Needs and Land Supply

Mr C Macmaster	P.J. Hodson
Mr C P Hales	Paddock Johnson Partnership
Mr C R Hutchinson	Paisleys Emporium
Mr C Roper	Pali Ltd
Mr C Simpson	Pareto Retail
Mr C W Dent BA Dip TP RIBA MRTPI	Partnership for Racial Equality
Mr C Wellstead	Party Paraphernalia
Mr Casement	Paul Butler Associates
Mr Cushion	Peacock and Smith
Mr D Allan	Peel Holdings
Mr D Birkett	Peel Ports
Mr D Brown	Pegasus Planning Group
Mr D Cashin	Persimmon Homes
Mr D Clamp	Peter Brett Associates
Mr D Cross	Phoenix House Residential Rehabilitation
Mr D Edwards	PHP Developments
Mr D Green	Pierhead Housing
Mr D Heron	Pine Court Housing
Mr D Hollett	Planinfoo Research Team
Mr D Howard	Planning and Environmental Services
Mr D Keene	Planning Potential
Mr D Lodge	Planware
Mr D Lomax	Plus Dane Housing
Mr D McKaigue	Port Sunlight Residents & Conservation Area Society
Mr D Mottershead	Port Sunlight Village Society
Mr D Murphy	Port Sunlight Village Trust
Mr D Neale	Poulton & District Residents Association
Mr D O Grady	Precious Moments
Mr D Patterson	Prime Maintenance & Development
Mr D Pogson	Pulford Road Residents Association
Mr D Smith	Pyramids Shopping Centre
Mr D Softley	R G Drake
Mr D Stone	Ramblers Association (Wirral Group)
Mr D Taylor	Red Partnerships
Mr D Taylor	Redrow Homes
Mr D Whiteley	Redsun Developments
Mr Dool	Regenda Housing Group
Mr E Fewtrell	Rev Father Ostaszewski
Mr E J Norton	R G & P Ltd
Mr F Bunni	RGB
Mr F Garner	Robinson & Neal
Mr F Howell	Rock Ferry Community Partnership
Mr F Hyde	Rock Park CAAC
Mr F Perkins	Rock Park Estate Management Committee
Mr F R Sumner	Rock Part Conservation Trust
Mr G Bryan	Roman Catholic Bishops Conference

Report of Further Consultation on Housing Needs and Land Supply

Mr G Ellison	Roman Summer Associates
Mr G Martin	Rowland Homes
Mr G McGaffney	Royal Estates
Mr G Morgan	Royal Liverpool Golf Club
Mr G Morris	Royal National Lifeboat Institution
Mr G Noble	RPS Planning Transport & Environment
Mr G S Nagra	RSPB
Mr G Smith	Rural Solutions
Mr G Tyrer	Russells Limited
Mr G Walmsley	Safety Layne Investments
Mr G Wilkinson	Salisbury Developments
Mr Gorman	Salisbury Group
Mr Grey	Salvation Army
Mr H Brereton	Mr S Khan
Mr H Grimshaw	Sanctuary Housing
Mr H S Cameron	Sanderson Weatherall
Mr H Thomas	Saughall Massie Village Conservation Area Society
Mr H Turnbull	Savills
Mr Hale	Scottish Power
Mr I Coulthard	SDA Architects
Mr I Dyer	Seacombe Community Partnership
Mr I Farrall	Secretary of State for Transport
Mr I Haslam	Seddon Homes
Mr I Hazelhurst	Sefton MBC
Mr I Wharmby	Seven Waves Radio
Mr I Gould	Shell UK Pipelines
Mr J A Wright BA (Hons) MRTPI	Shire Consulting
Mr J Baird	Showmens Guild of Great Britain
Mr J Barrington	Signet Planning
Mr J Barry	Smith & Sons Property Consultants
Mr J Beck	Society for Protection of Ancient Buildings
Mr J Bruce	SP Manweb
Mr J Burns	Spawforth Planning Consultants
Mr J Davies	Sport England
Mr J Davies	SSA Planning
Mr J Davies	St Helens MBC
Mr J Eve	St James Regeneration Action Team
Mr J Fleming	Steer Davies Gleave
Mr J Hall	Steven Abbott Associates
Mr J Hannibal	Stewart Ross Associates
Mr J Hulmes	Storey Sons & Parker
Mr J Hutcheson	Story Homes Ltd
Mr J Kay	Stratus Environmental Limited
Mr J Kelly	Street Design Partnership
Mr J Lightfoot	Strutt & Parker
Mr J Lloyd	Suburban Studios

Report of Further Consultation on Housing Needs and Land Supply

Mr J Mallon	Sunlight Vision
Mr J Martin-Whymark	Sustrans
Mr J Morris	Sutton Kersh
Mr J Noble	Talk Talk Communications
Mr J O'Connor	Tangent Properties
Mr J Priest	Taylor Wimpey Strategic Land
Mr J Roberts	Telefonica UK
Mr J Smith	Terrence O Rourke
Mr J Style	Tetlow King Planning
Mr J Thompson	The Front Room
Mr J Vaughan	Riverside Group
Mr J Walsh	Theatres Trust
Mr K Archibald	Thomas Eggar
Mr K Butchart	Thornton Hough Community Trust
Mr K Collins	Thornton Hough CAAC
Mr K Dodds	Three
Mr K Lucas	Tower Action Group
Mr L Burman	Townswomen Wirral 101-25
Mr L Maxwell	Tranmere Parks
Mr L Porter	Tranmere Together
Mr L Wood	Transition Town West Kirby
Mr Lynchy	Traveller Movement
Mr M Allen	Turley
Mr M Benson	Twentieth Century Society
Mr M Byrne	Unilever Research
Mr M Cockcroft	Unilever UK Property
Mr M Cunningham	United Utilities
Mr M Curtis	V David
Mr M Dewhirst	Venture Housing Association
Mr M F Lewis	Vernon & Co
Mr M Foster	Villa Medical Centre
Mr M Gallard	Vodafone and O2
Mr M Hood	Wainhomes Limited
Mr M Ireland-Jones	Wallasey Civic Society
Mr M Kivlehan	Wallasey Village Community Partnership
Mr M Lloyd	Walsingham Planning
Mr M Meredith Jones	Walton & Co
Mr M Pennington	Welcome Home Developments
Mr M Rattenshaw	Wellington Road CAAC
Mr M Sargant	Welsh Dee Trust
Mr M Saunders	West Kirby Village CAAC
Mr M Scott	West Lancashire Borough Council
Mr M Stone	Westwood Road Residents Association
Mr M Studley	White Young Green
Mr M Sullivan	Williams Estate Management
Mr Mahoney	WIRED
Mr Martin	Wirral & Cheshire Badger Group

Report of Further Consultation on Housing Needs and Land Supply

Mr McCormick	Wirral Association for Disability
Mr Mighall	Wirral Autistic Society
Mr N Ferguson	Wirral Barn Owl Trust
Mr N Flashman	Wirral Chamber of Commerce
Mr N Foode	Wirral Change
Mr N Hardman	Wirral Clinical Commissioning Group
Mr N Harvey	Wirral Community NHS Trust
Mr N Jones	Wirral Connect
Mr N Thompson	Wirral Environmental Network
Mr O Cook	Wirral Footpaths and Open Spaces Society
Mr P Barton MCD BA(hons)	Wirral Friends of the Earth
Mr P Berry	Wirral Green Belt Council
Mr P Burgess	Wirral Green Party
Mr P Cashin	Wirral History and Heritage Association
Mr P Cutts	Wirral Hospitals Trust
Mr P Doleman	Wirral Jehovahs Witnesses
Mr P Fishwick	Wirral Magistrates
Mr P Fitzgerald	Wirral Methodist Housing Association
Mr P Gowan	Wirral Metropolitan College
Mr P Harris	Wirral Multicultural Organisation
Mr P Haywood	Wirral Older Peoples Parliament
Mr P Healey	Wirral Planning Advice & Appeals Service
Mr P Jackson	Wirral Society
Mr P McCann	Wirral Tours
Mr P Milnes	Wirral Transport Users Association
Mr P Newby	Wirral University Teaching Hospital
Mr P Parker	Wirral Urban Farm Association
Mr P Pendleton	Wirral Wildlife
Mr P Perez	Woodland Trust
Mr P Reisdorf	Wrexham Council
Mr P Rust	Your Housing Group

Appendix 2 – List of Respondents¹

Acceptable LLP	Mr I Walker
Barratt Homes	Mr J Cocker
Barratts and Taylor Wimpey	Mr J Francis
Barratts Richborough and Taylor Wimpey	Mr J Hutchinson
Bellway Homes	Mr K Burnley
Bidston Village CAAC	Mr M Brown
Bloor Homes	Mr N J Lauro
Bromborough Society	Mr P Vernon
Canal and River Trust	Mr S Davies
Cheshire West and Chester Council	Mr Stevens
Councillor P Gilchrist	Mrs D Leyland
Councillor S Kelly	Mrs E Carbury
D G Cotgrave	Mrs G Lynch
D Morgan	Ms H Gill
Dr M Baker-Schommer	Ms J Douglas
Eastham Village Preservation Association	Ms K Lewis
Environment Agency	Ms M Anderson
G Lucking	Ms R Griffiths
Health and Safety Executive	National Trust
HIMOR Land	Natural England
Historic England	Persimmon Homes
Homes and Communities Agency	Redrow Homes
Hylgar Properties	Russell Homes
Irish Community Care Merseyside	S Maher
Knowsley Council	Satplan Ltd
Leverhulme Estates	Seaview Meadows Sustainable Planning
Liverpool City Council	Sefton Council
Magenta Living	Thornton Hough Community Trust
Marine Management Organisation	Trustees of the Poulton Hall Estate
McDermotts Meols	Unilever Bestfoods UK
Mr and Mrs Nixon	United Utilities
Mr B Bridson	Wainhomes Developments
Mr Cox	Wallace Land
Mr D Bird	West Lancashire Council
Mr D Gordon-Jones	Wirral Conservation Areas Group
Mr G McGaffney	Wirral Society
Mr G Walmsley	Wirral Wildlife

¹ Eight additional respondents did not disclose their identity