

Person ID	ID	Question 4.18 - Do you agree with our preferred approach to meeting demands in Wirral through Urban Intensification?	Question 4.18a - If No, please explain why you don't agree with this approach (please select):	Question 4.18b - If you answered Other, give a brief description here:	Question 4.18c - Please provide further details if you don't agree. If you agree you can also comment here.	Attachment 1	Attachment 2	Attachment 3	Attachment 4
1238147	LPIO-10069	yes			Higher density should always be subject to good planning principles.				
1245044	LPIO-10141	yes							
1246760	LPIO-10146	yes							
1246747	LPIO-10184	yes			I support this approach because the council should be able to meet its targets without building on any of the greenbelt land.				
1241629	LPIO-10368	yes							
1246754	LPIO-10370	yes							
1246717	LPIO-10390	no	Other (please state):	It may not deliver the required number of affordable units, and is high risk.	It is considered that some dispersed release of Green Belt sites will be necessary for the reasons set out earlier in this response, ensuring there is sufficient flexibility within the Plan to enable housing needs to be met over the Plan period. Additionally, it is considered that the Urban Intensification Strategy may be unable to deliver the required number of affordable units. The delivery of policy compliant schemes is harder when developing on constrained sites, which may require significant land remediation due to ground contamination; have multiple owners and planning obligation agreements; and may rely on grants to be delivered. Less technically constrained sites, such as those which were previously part of the Green Belt, are generally more likely to be home to a policy compliant provision of affordable housing, subject to viability. Additional potential urban sites have been identified as supporting the urban residential allocations within Option 1A. If the potential additional urban housing allocations identified cannot be added to the existing urban land supply, additional sites will have to be made available to support the residual housing land requirements. Moreover, should the density requirements not be reached, additional sites will be required to be released. Additional Green Belt release under Option 2A, Dispersed Green Belt Release, would support the Urban Intensification strategy in any event given such a high risk strategy is being progressed. Option 2A would allow land to be released from the Green Belt where it makes a weak contribution, and can be demonstrated to be deliverable under the Framework definition. Our Client's land interest, Land at Clatterbridge Hospital, is demonstrated to make a weak contribution to the Green Belt at the Supporting Statement to Question 2.6, and as such it should be included within this strategy through allocation for residential development				
1241065	LPIO-10405	yes							
1244412	LPIO-1042	yes			Yes for Wirral Waters and land known as Rose Brae				
1246724	LPIO-10458	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1246772	LPIO-10480	yes							
1246778	LPIO-10529	yes							
1246731	LPIO-10607	no	it won't provide the type of homes people want to live in; it won't provide homes where people want to live;		The preferred approach does not select 'Deliverable' sites for housing. They are not certain to be achievable and without a reasonable prospect that housing will be delivered on the sites within 5 years nor are they 'Developable' sites with a reasonable prospect that they will be available and could be viably developed at the point envisaged.				
1246733	LPIO-10623	yes							
1248825	LPIO-10689	yes			Supports the Urban Intensification approach. Wirral Waters can fully accord with the principle of 'increasing the density' by delivering high-density mixed-use development in a highly-liveable waterside environment and is capable of making by far the most significant contribution of any site in the borough. It is vital that, if this strategic spatial option is to be achieved, the necessary ingredients are put in place to deliver it. Continuation of the work undertaken to date in terms of putting in place infrastructure and preparatory site works but also in creating the Wirral Waters 'place' through environmental improvements in order to begin to change perceptions of the area is fundamental to ensuring delivery at Wirral Waters. The support of the Council, public sector bodies and other agencies and integrated working between these parties is also critical.	https://wirral-consult.objective.co.uk/file/5684264			
1246242	LPIO-10786				The only Urban Intensification required is on the Wirral banks of the River Mersey. The Wirral Waters project and land known as 'Rose Brae' can be developed to make an attractive sky line and much sort after properties.				
1247066	LPIO-10811	yes			I think you should review job growth as I think you are over exaggerating this. You should re-look at the 'empty homes' situation as this could reduce the requirement for new build.				
1247073	LPIO-10829	no							
1237930	LPIO-10844	no			I agree with urban intensification on Wirral Waters and on the land known as Rose Brae. We need an attractive skyline on the Wirral banks of the River Mersey.				
1247077	LPIO-10860	no			I agree with urban intensification on Wirral Waters and on the land known as Rose Brae. We need an attractive skyline on the Wirral banks of the River Mersey.				
1247087	LPIO-10894	yes							

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1247097	LPIO-10907	yes							
1247098	LPIO-10924	no			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey. However, this should not in any circumstances be supplemented by releasing land from the green belt.				
1247103	LPIO-10942				I agree with urban intensification on Wirral waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the river Mersey				
1247120	LPIO-10958	yes							
1247128	LPIO-11027	no			Intensification should be carried out on the East side of the M53 i.e. Birkenhead docklands area.				
1247129	LPIO-11040	yes							
1247130	LPIO-11058	yes			Yes, I agree with identifying Wirral Waters, Hind Street and Birkenhead regeneration.				
1247132	LPIO-11071	no							
1243890	LPIO-1108	no	it will mean higher density development which will impact on local character;						
1247135	LPIO-11105	yes							
1245190	LPIO-11125	yes							
1247144	LPIO-11140	yes							
1247146	LPIO-11156	yes			I agree with Urban Intensification on Wirral Waters.				
1246647	LPIO-11169	no							
1247154	LPIO-11194	yes			Identified Wirral Waters redevelopment.				
1247180	LPIO-11210	yes			We support the "Preferred Option" but with "urban intensification" , particularly using brownfield sites, turning employment sites into high density residential sites with the approach of working with partners and pump priming development. We support a sequential approach to development which ensures heritage sites are				
1247185	LPIO-11214				We support the "Preferred Option" but with "urban intensification" , particularly using brownfield sites, turning employment sites into high density residential sites with the approach of working with partners and pump priming development. We support a sequential approach to development which ensures heritage sites are preserve				
1243903	LPIO-11237				I support the Preferred option in the Local Plan, with Urban Intensification. I also support a sequential approach to development to ensure sustainable sites are developed before those with a heritage value. Children should have space to play all sports with closest proximity to their school, reducing risks of road crossings etc.				
1241832	LPIO-11240				I support a sequential approach to development in the area to ensure that sustainable sites are developed before those with a heritage value.				
1247276	LPIO-11447				I strongly support the 'Preferred Option' in the Local Plan to develop, BUT with 'Urban Intensification' including high density developments, turning employment sites into residential sites, using council owned land as a priority and working with partners to 'pump prime' development sites using grant funding. I strongly support a sequential approach to development to ensure sustainable sites are developed before those with a heritage value.				
1247342	LPIO-11534				I support the 'preferred option' in the local plan to develop but with urban intensification including high density developments and turning employment sites into residential sites.I support a sequential approach to development to ensure sustainable sites are developed before those with a value of history and heritage.				
1247348	LPIO-11543				I support the 'Preferred Option' in The Local Plan to develop but with Urban Intensification. Including high density developments, turning employment sites into residential sites. Using council owned lands as a priority and working with partners to 'pump prime' development on brownfield sites using grant funding. I support a sequential approach to development to ensure sustainable sites are developed before those with a heritage value.				
1238566	LPIO-11548				I support the 'Preferred Option' in The Local Plan to develop BUT with "Urban Intensification" including high density developments, turning employment sites into residential sites, using council owned land as a priority and working with partners to 'pump prime' development on brownfield sites using grant funding.				
1247196	LPIO-11584	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				

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1247015	LPIO-11796				Housing density should be maximised where appropriate in accordance with good planning practice.				
1238484	LPIO-11915				I support the preferred option in the Local Plan to develop BUT with urban intensification including high density developments, turning employment sites into residential sites, using council owned land as a priority and working with partners to 'pump prime' development on brownfield sites using grant funding. I also support a sequential approach to development to ensure more sustainable sties are developed before those with a heritage and/ecological value.				
1240731	LPIO-1193	yes							
1247214	LPIO-12411	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1244681	LPIO-1245	yes			If release of land from the Green Belt were to be considered necessary, a single urban extension is preferable to dispersed development, because suitable infrastructure could be included, there would be greater opportunity to demand high standards from developers, and proper communities could be planned for.				
1247492	LPIO-12511	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1247516	LPIO-12622	yes			I support the 'Preferred Option' in the Local Plan to develop BUT with "Urban Intensification" including high density developments, turning employment sites into residential sites, using council owned land as a priority and working with partners to 'pump prime' development on brownfield sites using grant funding.				
1240843	LPIO-12674	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1247540	LPIO-12762				I understand the development and growth are part of any urban area, but I want to urge the Council to prioritise the "Preferred Option" in the Local Plan to develop but with urban intensification, esp. for high density developments. For example, there are other unused properties already lying dormant in the village that should be converted first, before we start sacrificing the few green spaces that remain. I, along with many others, encourage the Council to follow a sequential approach to development to prioritise long-term sustainability, again, before we compromise on heritage sites.				
1237712	LPIO-12837				I support the 'Preferred Option' in the Local plan, of development with urban intensification.				
1247578	LPIO-12872	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1247510	LPIO-12996	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1246335	LPIO-13130	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1246338	LPIO-13271				I am in full agreement with the Council's position regarding building houses on Brownfield sites, and I hope that the Council will continue to make every effort to identify as many sites as possible for sensitive, attractive properties.				
1246364	LPIO-13278	yes			I wholly support the Council's promise that houses will be built on Brownfield sites, and I would urge the Council to increase the efforts to ensure that as many such sites are identified.				
1247687	LPIO-13303				I support the 'Preferred Option' in the Local Plan to develop but with 'Urban Intensification'				
1246853	LPIO-13387	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1247720	LPIO-13458				I support the Preferred Option in the Local Plan to develop but with Urban Intensification, concentrated on brownfield sites rather than green.				
1247738	LPIO-13473				I support the "preferred option" in the local plan to develop BUT with urban intensification, including high density developments, turning employment sites into residential sites, using council owned land as a priority and working with partners to "pump prime" development on brownfield sites using grant funding.				
1246852	LPIO-13510	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				

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1246351	LPIO-13581				Response to Consultation about Local Plan 1. Wirral Borough Council should go with its Preferred Option to build on urban and Brownfield sites alone. Local Green Spaces should also be protected particularly those in Conservation Area . 2. It should be possible to build sufficient houses and turn employment sites into residential sites, developing council owned land. Sustainable sites should be developed rather than those with heritage value.				
1247755	LPIO-13622				I support the 'Preferred Option' in the Local Plan but this must be with 'Urban Justification.				
1246065	LPIO-13626				I understand the development and growth are part of any urban area, but I want to urge the Council to prioritise the "Preferred Option" in the Local Plan to develop but with urban intensification, esp. for high density developments. For example, there are other unused properties already lying dormant in the village that should be converted first, before we start sacrificing the few green spaces that remain.				
1247746	LPIO-13665	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1247250	LPIO-13758	yes			Yes. I support the Council's preferred approach of urban intensification. There is a significant amount and variety of brownfield land available in the Wirral to accommodate the development required over the plan-period. The Council must now make a clear and genuine effort to positively deliver development in the urban area and on brownfield sites. Please take these comments into account .				
1238192	LPIO-13802				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247012	LPIO-13857				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247014	LPIO-13911				Housing density should be maximised where appropriate in accordance with good planning practice.				
1242183	LPIO-13984	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1247218	LPIO-14078	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1247219	LPIO-14182	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1243700	LPIO-1421	yes			I agree with controlled urban intensification to the east of the borough. i would emphasize that people also require a feeling of space in their lives. The retention of green space areas will be of great importance in the eastern urban areas.				
1247220	LPIO-14283	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1247222	LPIO-14412	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1247226	LPIO-14500	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1247245	LPIO-14590	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1246827	LPIO-14718	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1244905	LPIO-1481	yes			I support the Councils "preferred option" of development through Urban Intensification, including: 1. allowing employment sites to become residential sites 2. allowing high density developments 3. prioritising use of council land and working with council partners to pump prime development of brownfield sites. It is important in my opinion that a sequential approach is utilised to allow those sites that are sustainable to be developed before any consideration is given to potential development of sites with a heritage value. It is very important to retain the unique character of the Wirral (and one of the main reasons why I and many others like me have chosen to make the Wirral our home); this means leaving alone sites of historical and essential green value, areas of natural beauty and areas of historic or cultural value.				
1247016	LPIO-14847				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247018	LPIO-14915				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247246	LPIO-15337	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				

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1244901	LPIO-1543	yes							
1247248	LPIO-15452	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1247251	LPIO-15556	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1247252	LPIO-15647	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1247274	LPIO-15747	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1247275	LPIO-15868	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1247936	LPIO-16004	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1247952	LPIO-16174				I agree that housing demands should be met through urban intensification of brownfield sites, such as Wirral Waters. However, urban areas must have open space included in any new developments. There are 6000 empty properties on the Wirral and these homes should be made available before considering other options.				
1247287	LPIO-16213	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1247344	LPIO-16301	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1244969	LPIO-1634	yes			There is no justification for any Green Belt release				
1247349	LPIO-16388	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1247353	LPIO-16476	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1247354	LPIO-16564	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1247434	LPIO-16668	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1247935	LPIO-16719	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1247436	LPIO-16777	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1247437	LPIO-16918	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1247439	LPIO-16919	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1247441	LPIO-17075	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1247960	LPIO-17196	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1247962	LPIO-17283	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1247966	LPIO-17389	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1247971	LPIO-17493	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				

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1241726	LPIO-17592	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1247979	LPIO-17714	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1247980	LPIO-17715	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1242966	LPIO-17809				Q 4.12 and 4.17 and 4.12- 4.20, Both of options 2: Option 2A, Dispersed Green Belt Release and Option 2B Urban Extension conflict with National Planning Policy Framework. None of these sites are weakly performing green belt sites they all meet the test of green belt as set out in paragraph 134 of National planning Framework. site 11 is preventing neighbouring towns from merging into one another, they all check unrestricted urban sprawl and safeguard the countryside from encroachment. Therefore none of these sites meet the Exceptional test for removing land from the Green Belt. None of the sites in either of option 2 are served by adequate public transport, they will result in additional traffic generation, leading to congestion, noise and have an adverse impact on air quality. This is unsustainable development with an adverse impact on climate change. the Council needs o make a more concerned effort to deliver Option 1 and Central Government needs to look at the Standard Method for addressing the housing requirement as a matter of urgency.				
1245502	LPIO-17879	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1238043	LPIO-1791	yes							
1247541	LPIO-17978	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1247996	LPIO-18241	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1237857	LPIO-18260				I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1247021	LPIO-18398				Housing density should be maximised where appropriate in accordance with good planning practice.				
1245060	LPIO-1843	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1247022	LPIO-18452				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247023	LPIO-18507				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247024	LPIO-18562				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247025	LPIO-18639				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247038	LPIO-18640				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247039	LPIO-18761				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247040	LPIO-18762				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247041	LPIO-18850				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247042	LPIO-18916				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247060	LPIO-19004				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247061	LPIO-19005				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247063	LPIO-19092				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247064	LPIO-19146				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247068	LPIO-19201				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247071	LPIO-19258				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247072	LPIO-19314				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247078	LPIO-19370				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247080	LPIO-19452				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247081	LPIO-19455				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247082	LPIO-19639				Housing density should be maximised where appropriate in accordance with good planning practice.				

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1247083	LPIO-19693				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247084	LPIO-19749				Housing density should be maximised where appropriate in accordance with good planning practice.				
1238379	LPIO-1977	yes			I agree with the urban intensification on Wirral Waters				
1247085	LPIO-19811				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247088	LPIO-19877				Housing density should be maximised where appropriate in accordance with good planning practice.				
1242519	LPIO-1989	yes			I agree with urban intensification on wirral waters .				
1247089	LPIO-19938				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247090	LPIO-19994				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247091	LPIO-20048				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247092	LPIO-20107				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247093	LPIO-20167				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247094	LPIO-20226				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247095	LPIO-20282				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247096	LPIO-20338				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247099	LPIO-20394				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247101	LPIO-20448				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247108	LPIO-20589				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247102	LPIO-20590				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247106	LPIO-20629				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247105	LPIO-20630				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247109	LPIO-20718				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247110	LPIO-20791				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247111	LPIO-20792				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247112	LPIO-20938				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247113	LPIO-20992				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247115	LPIO-21048				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247116	LPIO-21102				Housing density should be maximised where appropriate in accordance with good planning practice.				
1246851	LPIO-21170	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1246918	LPIO-21324	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1246924	LPIO-21325	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1246928	LPIO-21326	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1245112	LPIO-2153	yes							
1246920	LPIO-21553	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1246926	LPIO-21554	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1247117	LPIO-21701				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247118	LPIO-21702				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247145	LPIO-21809				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247147	LPIO-21810				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247148	LPIO-21917				Housing density should be maximised where appropriate in accordance with good planning practice.				

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1247150	LPIO-21918				Housing density should be maximised where appropriate in accordance with good planning practice.				
1244329	LPIO-22015				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247119	LPIO-22090				Housing density should be maximised where appropriate in accordance with good planning practice.				
1246678	LPIO-22091				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247151	LPIO-22194				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247152	LPIO-22195				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247153	LPIO-22312				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247155	LPIO-22313				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247156	LPIO-22420				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247158	LPIO-22421				Housing density should be maximised where appropriate in accordance with good planning practice.				
1245100	LPIO-2247	yes							
1247159	LPIO-22615				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247160	LPIO-22616				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247161	LPIO-22655				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247164	LPIO-22656				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247167	LPIO-22788				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247168	LPIO-22789				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247169	LPIO-22986				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247170	LPIO-22987				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247173	LPIO-23065				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247174	LPIO-23066				Housing density should be maximised where appropriate in accordance with good planning practice.				
1237870	LPIO-2312				As stated previously - If the Council are going to develop Wirral Waters / Birkenhead and towns / villages on East Wirral then I agree. These areas need money spent on them to regenerate the area and make it a place where people want to live and work.				
1247175	LPIO-23173				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247176	LPIO-23174				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247177	LPIO-23316				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247178	LPIO-23317				Housing density should be maximised where appropriate in accordance with good planning practice.				
1247179	LPIO-23318				Housing density should be maximised where appropriate in accordance with good planning practice.				
1248463	LPIO-23744	yes			We support the Council's preferred approach of urban intensification. There is a significant amount and variety of brownfield land available in the Wirral to accommodate the development required over the plan-period. The Council must now make a clear and genuine effort to positively deliver development in the urban area and on brownfield sites.	https://wirral-consult.objective.co.uk/file/5657858			
1248438	LPIO-23766 1 of 2				By pursuing Spatial Option 1A, there is the very real risk that the Council will be unable to demonstrate a five-year housing land supply upon adoption of the Local Plan, contrary to paragraph 73 of the NPPF. In view of the Green Belt constraints across the whole of the Borough, there would be no contingency available to the Council to address any shortfall should sites fail to come forward as expected, or are delayed owing to issues of viability (such as unforeseen contamination issues typically associated with brownfield sites and which could equally impact on the delivery of affordable housing on viability grounds). Accordingly, the Borough would be faced with the very same problems that it has encountered since the end of the UDP period, that being a shortfall in net housing completions. We have no objection to the regeneration and redevelopment of brownfield sites; in principle, as it is representative of sustainable development. However, there is a need to balance the redevelopment and regeneration of areas with the need to maintain the vitality and viability of other town and villages in the Borough. This requires a much more balanced approach to the spatial distribution of new housing than that currently proposed by the Council as part of its preferred approach. Beyond that, there are questions of whether the local infrastructure can cope with an increase in housing delivery in East Wirral owing to an increased concentration of vehicles and traffic in that part of the Borough; significant funding will be required, including gap funding from development sites which could otherwise impact on their overall viability and the ability to satisfy other emerging Local Plan policy requirements.	https://wirral-consult.objective.co.uk/file/5684850	https://wirral-consult.objective.co.uk/file/5657890		

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1248438	LPIO-23766 2 of 2				This would also have environmental implications in respect of air and noise pollution which would need to be addressed consistent with the environmental protection and enhancement objectives set out within the NPPF. Whilst Wirral Waters does benefit from £6m of HIF Funding to unlock the delivery of 1,000 homes, the Council's Infrastructure Delivery Plan identifies that considerably more investment will be required to deliver a range of public transport and pedestrian/cycle schemes/improvements and to facilitate the re-location of industrial operators from Wirral Waters elsewhere in the Borough. At present, this funding is not confirmed. New residential development should be aligned to meeting actual housing needs; high-density development, particularly in Birkenhead and its hinterlands, will typically mean more apartments and fewer family homes (terraced, semi-detached, detached). Concentrating the majority of new development to the urban conurbation will naturally have this effect and in time could lead to market saturation (particularly given the proximity to competing, high-density development across the River Mersey in the City of Liverpool). In summary, we object to Spatial Option 1A as it is not considered to be positively prepared or justified and is not consistent with national policy which requires Local Plan to be aspirational but deliverable.				
1248445	LPIO-23826				The consultation document makes it clear that the preferred option is Urban Intensification without Green Belt release and sets out what is required in order to achieve that option. It also hedges its bet that, in the event that some Green Belt release is required, the solution could be a hybrid of the various options. The qualification of the first sentence by the second; this hedging of bet, is a disappointment. The Council should have the courage to take a stand on its environmental and heritage assets; concentrate on development where it is needed. It is now clear that the Council has the opportunity and evidence to make a case on grounds of exception to ensure that the peninsula retains its character with its long-standing Green Belt intact.	https://wirral-consult.objective.co.uk/file/5659115	https://wirral-consult.objective.co.uk/file/5659116		
1248794	LPIO-23832				We support the Council's overarching strategy for development in the Borough, which seeks to focus development within the existing urban area and prioritises the Urban Conurbation at the pinnacle of the settlement hierarchy. We agree that this is a pro-active, regeneration-focused approach that will make the most effective use of vacant and underused brownfield land in line with the priorities of national policy. Development densities will need to be maximised where this is appropriate and achievable, particularly in close proximity to public transport hubs and existing services and facilities, to ensure the most appropriate patterns of sustainable development across the Borough. We also agree that the focus for development and investment within the Urban Conurbation will provide the opportunity to position this large urban area on the opposite bank of the river to Liverpool as an engine that will drive economic and social growth and revitalisation at the heart of the City Region.	https://wirral-consult.objective.co.uk/file/5684986			
1248448	LPIO-23847 1 of 2				The housing land supply has been grossly inflated through the application of unrealistic density rates and is reliant upon the establishment of new residential markets for major apartment developments. There is insufficient evidence to demonstrate that such an approach is suitable, viable and capable of meeting identified housing needs. There is a significant over reliance upon intensification and rescheduling of deliverable and developable sites; conversions; windfall sites; changes of use; and empty homes. The overall evidence base in relation to housing land supply is severely lacking and unrealistic. The vast majority of these sites are within the urban area, so if they were genuinely available they could have come forward without an up to date local plan if the market demand was there. The Council's trajectory includes a windfall allowance of 70 per annum and conversions and changes of use of 80 per annum. This is based on the average number of dwellings which were completed on these sites over the previous 10 years. This is set out in paragraphs 2.49 to 2.59 of the SHLAA. It equates to 350 homes for windfalls and 400 for conversions and changes of use for each 5-year plan period. We consider there is the potential for double counting on three grounds. The first is that windfall sites are defined in the Framework as "Sites not specifically identified in the development plan". Due to the aged nature of the Wirral UDP, the majority of completions in the last 10 years will have been from windfall sites. Table 2.5 of the SHLAA shows that there was a total of 798 windfalls granted permission and 963 net Conversions and Changes of Use. These figures are not completions but if we assume in the unlikely event that all were built, that would equate to 1,761 dwellings. The total number of completions between 2008 and 2018 was 3,274, so windfall and conversions amounted to 54% of all completions. With sites now allocated in the Local Plan, as listed in Appendix 4.1 and with a SHLAA assessing sites of 1 or more dwellings, the majority of completions will come from the development plan and the SHLAA and will not meet the definition of a windfall in the Framework.	https://wirral-consult.objective.co.uk/file/5656108	https://wirral-consult.objective.co.uk/file/5656110		
1248448	LPIO-23847 2 of 2				The second is that Appendix 4.1 shows the range in size of the allocations, which are from single dwellings to large sites. We have calculated that there are 340 dwellings allocated on sites of 10 dwellings or below which are usually not allocated in a development plan but form part of the evidence base for a windfall allowance. In this Local Plan there is therefore double counting as these sites are both allocated but would also fall within the scope of a windfall site. The Council needs to choose one route, which is either include the windfall allowance of 70 dwellings per annum and reduce the allocations or vice versa. The third is that many of the windfall sites that will deliver new homes over the first three years of the plan period will already benefit from planning permission. Therefore to avoid any double counting it is necessary to exclude the windfall allowance for the first three years of the 5 year period. This is commonly accepted across the country and in appeal decisions. For example the trajectory from the Wigan Core Strategy Inspector's Report excludes a windfall allowance for the first 3 years. The same should apply here with a reduction of 210 dwellings for windfalls and 240 for conversions and changes of use at the very least. The Council is proposing to allocate a range of sites for housing in the built-up area concentrating on the eastern part of the district centred on Birkenhead. Whilst we do not object to the principle of redeveloping longstanding previously developed sites, we have concerns regarding the Council's assessment of supply. Further sites are required to address Wirral's housing needs, and this will have to involve the release of land from the Green Belt. We consider that Options 1A and 1B will not meet the housing needs in the plan period and should be discounted. The Council needs to provide the detailed supporting evidence to justify the land supply identified, as some of the sites are not suitable and deliverable.				

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1242185	LPIO-23913	yes			Yes, we support urban intensification but to be clear Option 1B that employs a stepped approach to delivery to ensure the Council does not fail the stringent 85% target of the Housing Delivery Test introduced when the NPPF was revised in July 2019. Otherwise the Local Plan will be quickly rendered out of date, with all the harmful consequence that flows. Please refer to NPPF Annex 1 Implementation. We nevertheless believe much more can, and should, be done, including: identify all the 'suitable' brownfield sites, (as defined as deliverable and developable in NPPF Annex 2 Glossary, 2019), and planning to effectively help to unlock identified constraints, so more brownfield land can be used for development during the Local Plan period; the reuse of long term empty homes needs factoring in; allocating yet more greenfield will only hamper brownfield regeneration, against NPPF Paragraph 134 purpose e); optimise the density of development, including setting out policies which promote uplift in density in town centres and locations well served by public transport; maximise potential for neighbours to accommodate some of the local housing requirement to support urban regeneration and housing growth ambitions of Liverpool and Sefton. By increasing the use of brownfield, having appropriate density of development and by improved coordination with neighbours, making more effective use of land is more likely to be complied with and the need to release any Green Belt land is eradicated, certainly the case there is an exceptional circumstance is eroded.	https://wirral-consult.objective.co.uk/file/5659121	https://wirral-consult.objective.co.uk/file/5684263	https://wirral-consult.objective.co.uk/file/5657006	
1248472	LPIO-24031				We OBJECT to the Council's preferred approach to meeting housing demands in Wirral through Urban Intensification. A realistic view needs to be taken on the urban intensification approach (which is fraught with viability barriers) and the single urban extension approach (which will not deliver the number of homes required during the Plan period). The only logical approach to meeting housing needs in this Borough is Option 2A the dispersed Green Belt approach coupled with realistic aspirations with regard to urban intensification. With regard to the latter the urban intensification approach is highly likely to need time well beyond the Plan period to deliver anywhere near the number of dwellings the sites concerned are said to have capacity to deliver.	https://wirral-consult.objective.co.uk/file/5684824	https://wirral-consult.objective.co.uk/file/5684823		
1248472	LPIO-24032				It is assumed that the Council is using a 1 April 2020 base date in its calculations. Subject to the timing of submission of the Plan for Examination it would be helpful if data on demolitions and completions were included in the Plan for the period 1 April 2020 – 31 March 2021 so as to avoid any delays at Examination.	https://wirral-consult.objective.co.uk/file/5684824	https://wirral-consult.objective.co.uk/file/5684823		
1248472	LPIO-24033				Whilst the Council has used a historic rate of 50 demolitions per annum it is unclear whether this is a robust figure going forward.	https://wirral-consult.objective.co.uk/file/5684824	https://wirral-consult.objective.co.uk/file/5684823		
1248472	LPIO-24034				It is noted that the majority of the committed supply has detailed planning permission. However, in respect of those dwellings with outline planning permission it is unclear what evidence the Council has to justify their inclusion in the supply. To comply with the deliverable definition for major developments set out in the Framework sites with outline planning permission should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.	https://wirral-consult.objective.co.uk/file/5684824	https://wirral-consult.objective.co.uk/file/5684823		
1248472	LPIO-24035				A number of sites in the deliverable supply have current uncertainties, these include: Wirral Growth Company (356/489 dwellings) – subject to formal confirmation of initial programme. The Council will need robust evidence to include this contribution in the deliverable supply.	https://wirral-consult.objective.co.uk/file/5684824	https://wirral-consult.objective.co.uk/file/5684823		
1248472	LPIO-24036				Only 33 of the dwellings in the affordable housing programme have planning permission. The remainder do not qualify as deliverable dwellings having regard to the Framework definition.				
1248472	LPIO-24039				Other SHLAA 2019 (477 Dwellings Current/626 Dwellings Potential): The majority of dwellings listed do not qualify as deliverable dwellings having regard to the Framework definition. Only 198 dwellings currently have planning permission (see Table 5).	https://wirral-consult.objective.co.uk/file/5684824	https://wirral-consult.objective.co.uk/file/5684823		
1248472	LPIO-24040				Other Pipeline Sites (0 Dwellings Current/66 Dwellings Potential): These dwellings do not qualify as deliverable dwellings having regard to the Framework definition as none have planning permission of any sort (see Table 6).	https://wirral-consult.objective.co.uk/file/5684824	https://wirral-consult.objective.co.uk/file/5684823		
1248472	LPIO-24041				ELOS Sites (0 Dwellings Current/66 Dwellings Potential): These dwellings do not qualify as deliverable dwellings having regard to the Framework definition as none have planning permission of any sort (see Table 7).	https://wirral-consult.objective.co.uk/file/5684824	https://wirral-consult.objective.co.uk/file/5684823		
1248472	LPIO-24042				Conversions & Change of Use (400 Dwellings/50 per annum) New Build Windfalls (350 Dwellings/70 per annum): The Council has only referred to the historic windfall rate. In accordance with Paragraph 70 of the Framework it is also necessary to identify compelling evidence that this rate will continue, such evidence appears to be lacking. Additionally, there is significant potential for double counting given that the Council is relying on SHLAA sites for the first five years.	https://wirral-consult.objective.co.uk/file/5684824	https://wirral-consult.objective.co.uk/file/5684823		

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1248490	LPIO-24088				The Council's calculations in Table 4.1 relies too heavily on insufficiently justified windfall allowances. The Council has split windfalls into three separate categories and unjustifiably included proportionately large allowances within each. This level of supply cannot be included in the trajectory as this would rely on unidentified sites coming forward when the Council has limited control over their availability. They are an unreliable source of supply which would lead to an under provision of housing across the Plan period. The Council has undertaken a detailed site identification process through the preparation of their 2019 SHLAA, which has assessed and identified a large number of sites. It is therefore difficult to understand the Council's rationale for determining that there are an additional 3,600 developable units available over the plan period outwith those already identified. A central tenant of the Framework [§15] is that we operate in a plan led system. Relying on large proportions of unidentified sites coming forward is at variance with this ambition.	https://wirral-consult.objective.co.uk/file/5676992	https://wirral-consult.objective.co.uk/file/5673252	https://wirral-consult.objective.co.uk/file/5673251	https://wirral-consult.objective.co.uk/file/5684856
1248490	LPIO-24189				The preferred approach will not provide the right mix of dwellings. Our analysis shown 48 sites with a capacity to deliver 20 or more units. These sites together have a total capacity of 4,107 dwellings. There are 1,819 units (17 sites) with planning permission on sites over 20 units which have been assessed as being deliverable and developable. There are 485 1-bed units with permission and 646 2-bed units with permission making up approximately 62% of the supply. There are 382 3-bed and 314 4-bed units with permission, comprising 38% of the supply which is completely at variance with the Council's preferred approach. We have used our own professional judgement to estimate the unit size likely to be delivered on sites with a capacity of over 20 dwellings without permission. Overall, we consider that of the Council's developable supply of 4,107 from units with a capacity of 20 or more units, 1,270 units (31%) comprise 1-bed units with a further 1,536 units (37%) comprising 2-bed units, equivalent to over two thirds of the Council's deliverable and developable supply (68%) on sites with a capacity of over 20 units, despite there only being a need to deliver between 35-40%. This does not align with the preferred approach being advocated in the emerging Local Plan or the evidence from the 2020 SHMA or our own analysis which requires the opposite mix. Units assumed to be delivered through change of uses are also likely to be small. This does not align with the Council's aspiration to deliver 60% houses and 18% bungalows with 60% of the units comprising 3+ bedrooms according to the SHMA or 65% according to our own analysis.	https://wirral-consult.objective.co.uk/file/5676992	https://wirral-consult.objective.co.uk/file/5673252	https://wirral-consult.objective.co.uk/file/5673251	https://wirral-consult.objective.co.uk/file/5684856
1248496	LPIO-24199				United Utilities would encourage information on anticipated delivery rates as soon as it becomes available.	https://wirral-consult.objective.co.uk/file/5684806			
1248490	LPIO-24203				No site-specific assessments of the key strategic sites upon which the plan relies have been completed. The claimed supply on the three key strategic sites at Wirral Waters, Hind Street and Woodside is being overstated and the Council has not provided sufficient evidence to demonstrate that some sites or specific portions of the sites will have a 'realistic prospect' of coming forward as envisaged within the WLP period. When taken together the current proposals to concentrate new housing development in a small geographical low value area over the plan period in an area where there is currently limited demand for apartments will quickly result in market saturation. The oversupply of such accommodation will inevitably restrict the potential for any increase in Market Values. It is unlikely that any level of grant funding that may be available would be sufficient to breach the viability gap on these types of site. Further detail is set out in our attachments and comments have also been recorded for each site under question 4.2	https://wirral-consult.objective.co.uk/file/5676992	https://wirral-consult.objective.co.uk/file/5673252	https://wirral-consult.objective.co.uk/file/5673251	https://wirral-consult.objective.co.uk/file/5684856
1248496	LPIO-24205				The Local Plan will place development priorities towards Birkenhead/Bromborough/existing urban areas, which are at the top of the peninsula. Taking this into account, the sites identified may be adjacent to infrastructure assets that are likely to be on the fringe/limits of the existing water supply. Any growth in these areas will need to be carefully planned with United Utilities.	https://wirral-consult.objective.co.uk/file/5684806			
1248496	LPIO-24209				United Utilities would like to outline a preference for the site selection process having regard to the availability of alternatives to the public sewer for the discharge of surface water. Such alternatives include local watercourses/land drains, which are preferable to the discharge of the public combined sewer for the discharge of surface water. Sites that have more sustainable options than the combined sewer for the discharge of surface water should be preferred as site allocations are being finalised.	https://wirral-consult.objective.co.uk/file/5684806			
1248496	LPIO-24212				The vision for a brownfield-first approach to allocations, which includes emphasis on the regeneration of the Boroughs urban areas as preferred locations for new housing and employment development is welcomed by United Utilities.	https://wirral-consult.objective.co.uk/file/5684806			
1248496	LPIO-24219				Some of the potential allocations are within defined groundwater Source Protection Zones 1 or 2. Early engagement with the Environment Agency and United Utilities is strongly recommended, so that effective masterplanning can be undertaken. The details of GWSPZs can be viewed on the website of the Environment Agency. United Utilities' strong preference is for development to take place outside of any Environment Agency designated Source Protection Zone 1.	https://wirral-consult.objective.co.uk/file/5684806			

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1247798	LPIO-24236 1 of 2				Brownfield sites are likely to attract more abnormal costs than a greenfield site; in this regard, the Council's preferred urban conurbation approach carries much greater risk in terms of site's being unable to satisfy Local Plan policy requirements. The Council's Viability Study recognises that brownfield land in the lowest value areas around Birkenhead were generally not viable without adjustments to the level of developer profits and/or land price. By pursuing Spatial Option 1A, there is the very real risk that the Council will be unable to demonstrate a five-year housing land supply upon adoption of the Local Plan, contrary to paragraph 73 of the NPPF. In view of the Green Belt constraints across the whole of the Borough, there would be no contingency available to the Council to address any shortfall should sites fail to come forward as expected, or are delayed owing to issues of viability (such as unforeseen contamination issues typically associated with brownfield sites and which could equally impact on the delivery of affordable housing on viability grounds). Accordingly, the Borough would be faced with the very same problems that it has encountered since the end of the UDP period, that being a shortfall in net housing completions. We have no objection to the regeneration and redevelopment of brownfield sites; in principle, it is representative of sustainable development. However, there is a need to balance the redevelopment and regeneration of areas with the need to maintain the vitality and viability of other town and villages in the Borough.	https://wirral-consult.objective.co.uk/file/5684846			
1247798	LPIO-24236 2 of 2				This requires a much more balanced approach to the spatial distribution of new housing than that currently proposed by the Council as part of its preferred approach. Beyond that, there are questions of whether the local infrastructure can cope with an increase in housing delivery in East Wirral owing to an increased concentration of vehicles and traffic in that part of the Borough; significant funding will be required, including gap funding from development sites which could otherwise impact on their overall viability and the ability to satisfy other emerging Local Plan policy requirements. This would also have environmental implications in respect of air and noise pollution which would need to be addressed consistent with the environmental protection and enhancement objectives set out within the NPPF. Whilst Wirral Waters does benefit from £6m of HIF Funding to unlock the delivery of 1,000 homes, the Council's Infrastructure Delivery Plan identifies that considerably more investment will be required to deliver a range of public transport and pedestrian/cycle schemes/improvements and to facilitate the re-location of industrial operators from Wirral Waters elsewhere in the Borough. At present, this funding is not confirmed. New residential development should be aligned to meeting actual housing needs; high-density development, particularly in Birkenhead and its hinterlands, will typically mean more apartments and fewer family homes (terraced, semi-detached, detached). Concentrating the majority of new development to the urban conurbation will naturally have this effect and in time could lead to market saturation (particularly given the proximity to competing, high-density development across the River Mersey in the City of Liverpool).				
1244826	LPIO-2427	yes		I agree with Urban Intensification on Wirral Waters and on the land. We need an attractive skyline on the Wirral banks of the River Mersey.	I agree with Urban Intensification on Wirral Waters and on the land. We need an attractive skyline on the Wirral banks of the River Mersey.				
1248466	LPIO-24272 1 of 2				We consider that there is a significant overreliance upon intensification and rescheduling of deliverable and developable sites; conversions; windfall sites; changes of use; and empty homes. The Council's trajectory includes a windfall allowance of 70 per annum and conversions and changes of use of 80 per annum. This is based on the average number of dwellings which were completed on these sites over the previous 10 years. This is set out in paragraphs 2.49 to 2.59 of the SHLAA. It equates to 350 homes for windfalls and 400 for conversions and changes of use for each 5-year plan period. We consider there is the potential for double counting on three grounds. The first is that windfall sites are defined in the Framework as "Sites not specifically identified in the development plan". Due to the aged nature of the Wirral UDP, the majority of completions in the last 10 years will have been from windfall sites. Table 2.5 of the SHLAA shows that there was a total of 798 windfalls granted permission and 963 net Conversions and Changes of Use. These figures are not completions but if we assume in the unlikely event that all were built, that would equate to 1,761 dwellings. The total number of completions between 2008 and 2018 was 3,274, so windfall and conversions amounted to 54% of all completions. With sites now allocated in the Local Plan, as listed in Appendix 4.1 and with a SHLAA assessing sites of 1 or more dwellings, the majority of completions will come from the Local Plan and the SHLAA and will not meet the definition of a windfall in the Framework.	https://wirral-consult.objective.co.uk/file/5674415	https://wirral-consult.objective.co.uk/file/5674416	https://wirral-consult.objective.co.uk/file/5685040	https://wirral-consult.objective.co.uk/file/5674418
1248466	LPIO-24272 2 of 2				The second is that Appendix 4.1 shows the range in size of the allocations, which are from single dwellings to large sites. We have calculated that there are 340 dwellings allocated on sites of 10 dwellings or below which are usually not allocated in a development plan but form part of the evidence base for a windfall allowance. In this Local Plan there is therefore double counting as these sites are both allocated but would also fall within the scope of a windfall site. The Council needs to choose one route, which is either include the windfall allowance of 70 dwellings per annum and reduce the allocations or vice versa. The third is that many of the windfall sites that will deliver new homes over the first three years of the plan period will already benefit from planning permission. Therefore to avoid any double counting it is necessary to exclude the windfall allowance for the first three years of the 5 year period. This is commonly accepted across the country and in appeal decisions. For example the trajectory from the Wigan Core Strategy Inspector's Report excludes a windfall allowance for the first 3 years. The same should apply here with a reduction of 210 dwellings for windfalls and 240 for conversions and changes of use at the very least.				

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1248517	LPIO-24288				Responses to the previous Development Options Review Consultation identified several key points among which was the desire to ensure that "the development of brownfield land should be the first priority..." We agree with this sentiment. Whilst we agree that the main focus of development should be Wirral Waters and that the focus for regeneration and investment should be the area to the east of the M53 Motorway, the plan fails to fully consider the potential offered by other brownfield land within the plan area. We strongly agree with the need to "make the most effective use of vacant and underused brownfield land in line with the priorities in national policy" but this should include previously developed sites in the Green Belt.				
1248517	LPIO-24289				The Issues and Options document proposes four alternative options for meeting the needs of the Borough to allocate sufficient land - two of the Options envisage use of urban land only and two involve the release of Green Belt land. The Council's preferred approach involves seeking to meet all the Borough's requirements by developing only urban sites at higher densities. The Council acknowledges however that there are not enough deliverable or developable sites within the Borough to meet development needs. The proposed solution involves undertaking further "call for sites" exercises, reviewing lapsed permissions, seeking to improve the viability of certain sites and releasing potential employment sites. This approach is unsound, as the plan cannot be prepared positively if its starting proposition is that it has failed to identify enough land to accommodate development needs.				
1248142	LPIO-24296				Fully support the preferred approach by meeting the demands through urban intensification.	https://wirral-consult.objective.co.uk/file/5658623			
1248520	LPIO-24304	yes			We support the Council's overarching strategy for development in the Borough, which seeks to focus development within the existing urban area and prioritises the Urban Conurbation at the pinnacle of the settlement hierarchy. We agree that this is a pro-active, regeneration-focused approach that will make the most effective use of vacant and underused brownfield land in line with the priorities of national policy. Development densities will need to be maximised where this is appropriate and achievable, particularly in close proximity to public transport hubs and existing services and facilities, to ensure the most appropriate patterns of sustainable development across the Borough. We also agree with the Council that focusing development and investment within the Urban Conurbation will provide the opportunity to position this large urban area on the opposite bank of the River Mersey to Liverpool as an engine that will drive economic and social growth and revitalisation for the benefit of the City Region.	https://wirral-consult.objective.co.uk/file/5684265			
1248525	LPIO-24324				To ensure a sufficient urban land supply, the Council must maximise the regeneration of urban land and make the best use of this land resource. In this context, it is vital that the Council does not protect land allocated for employment use where there is no realistic prospect of delivery during the Plan period. This is particularly important where it is viable to deliver beneficial alternative uses, such as housing, that would satisfy the Borough's development needs and regeneration objectives. National planning policy makes this point explicitly clearly. The Framework's tests of soundness instruct that Local Plans must be deliverable over the Plan period and it is unclear from the evidence base whether this is the case. The Framework stipulates LPAs should regularly review their land allocations and where there is no reasonable prospect of an application coming forward for a allocated use, they should (as part of a Local Plan review) reallocate the land for a more deliverable use that can help address identified needs. The Council must avoid policies in the emerging WLP that lead to the unnecessary long-term protection of land for employment use. It must set positive policies that seek to recycle this brownfield land for alternative uses that meet development needs, such as new homes, to ensure that urban land supply is maximised.				
1248551	LPIO-24414				The preferred approach seeks to prioritise the delivery of brownfield land ahead of any Green Belt release. An approach which seeks to prioritise brownfield land is not consistent with the requirements of national policy which only seeks to encourage the redevelopment of previously developed land. The preferred approach and a reliance on Option 1A risks the deliverability of the Plan as such sites will be associated with complex planning arrangements and infrastructure requirements which may hinder the anticipated delivery of such sites. It is unrealistic to assume that all sources of the Council's brownfield supply will come forward, due to a range of issues relating to development viability, land availability, land contamination etc. Table 4.1 demonstrates a total supply of 10,306 dwellings over the plan period and a potential 2,500 dwelling shortfall over the plan period if this option is progressed. It is therefore necessary for the Council to consider a hybrid approach which seeks to regenerate these areas as well as releasing land from the Green Belt which does not provide a strong contribution to the purposes of Green Belt to meet the housing needs of the Borough as well as those of neighbouring authorities if requested and agreed under the DfC. A hybrid approach is more likely to result in a plan which is deliverable over the plan period and capable of being found sound through the examination process.	https://wirral-consult.objective.co.uk/file/5655918			

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1245996	LPIO-24579 1 of 2				There is a significant overreliance upon intensification and rescheduling of deliverable and developable sites; conversions; windfall sites; changes of use; and empty homes. The vast majority of these sites are within the urban area and are reliant on the establishment of new residential markets for major apartment developments. If they were genuinely available they could have come forward without an up to date local plan if the market demand was there. The Council's trajectory includes a windfall allowance of 70 per annum and conversions and changes of use of 80 per annum. This is based on the average number of dwellings which were completed on these sites over the previous 10 years. This is set out in paragraphs 2.49 to 2.59 of the SHLAA. It equates to 350 homes for windfalls and 400 for conversions and changes of use for each 5-year plan period. We consider there is the potential for double counting on three grounds. The first is that windfall sites are defined in the Framework as "Sites not specifically identified in the development plan". Due to the aged nature of the Wirral UDP, the majority of completions in the last 10 years will have been from windfall sites. Indeed Table 2.5 of the SHLAA shows that there was a total of 798 windfalls granted permission and 963 net Conversions and Changes of Use. These figures are not completions but if we assume in the unlikely event that all were built, that would equate to 1,761 dwellings. The total number of completions between 2008 and 2018 was 3,274, so windfall and conversions amounted to 54% of all completions.	https://wirral-consult.objective.co.uk/file/5681950			
1245996	LPIO-24579 2 of 2				With sites now allocated in the Local Plan, as listed in Appendix 4.1 and with a SHLAA assessing sites of 1 or more dwellings, the majority of completions will come from the development plan and the SHLAA and will not meet the definition of a windfall in the Framework. The second is that Appendix 4.1 shows the range in size of the allocations, which are from single dwellings to large sites. We have calculated that there are 340 dwellings allocated on sites of 10 dwellings or below which are usually not allocated in a development plan but form part of the evidence base for a windfall allowance. In this Local Plan there is therefore double counting as these sites are both allocated but would also fall within the scope of a windfall site. The Council needs to choose one route, which is either include the windfall allowance of 70 dwellings per annum and reduce the allocations or vice versa. The third is that many of the windfall sites that will deliver new homes over the first three years of the plan period will already benefit from planning permission. Therefore to avoid any double counting it is necessary to exclude the windfall allowance for the first three years of the 5 year period. This is commonly accepted across the country and in appeal decisions. For example the trajectory from the Wigan Core Strategy Inspector's Report which excludes a windfall allowance for the first 3 years. The same should apply here with a reduction of 210 dwellings for windfalls and 240 for conversions and changes of use at the very least.				
1245996	LPIO-24580				The Council is proposing to allocate a range of sites for housing in the built-up area concentrating on the eastern part of the district centred on Birkenhead. Whilst we do not object to the principle of redeveloping longstanding previously developed sites, we have concerns regarding the Council's assessment of supply. Further sites are required to address Wirral's housing needs, and this will have to involve the release of land from the Green Belt. Therefore, we consider that Options 1A and 1B will not meet the housing needs in the plan period and should be discounted.	https://wirral-consult.objective.co.uk/file/5681950			
1248588	LPIO-24597				The housing land supply has been artificially inflated through the application of unrealistic density rates and is reliant upon the establishment of new residential markets for major apartment developments. There is insufficient evidence to demonstrate that such an approach is suitable, viable and capable of meeting identified housing needs. Wirral cannot meet its housing needs without the release of some Green Belt land.	https://wirral-consult.objective.co.uk/file/5681617			
1242697	LPIO-24670				Tables 4.1 and 4.2 assume the standard method calculations of 12,000 dwellings in 15 years, 4,000 per 5-year phase, or 800pa. Disagree with the need for a buffer and the pessimistic empty homes supply. A buffer is not needed with a lower need of 581 – 633pa. "Other losses" and the discrepancy of 581 between the 10,306 dwellings quoted in Table 4.1 and the total of 10,887 in the Appendices need explaining. The estimates used appear to be based on a pessimistic projection of bringing empty homes into use, overstated demolitions (which reflect an outlier, without which the 4-year average would be 36pa (not 50pa)), understated net additions (reflects another outlier), and current new build permissions (which have not been projected on). The attached document shows the fuller analysis on these topics. Table 4.1 refers to a supply of 10,306 but Table 4.2 refers to the potential figure of 14,841 in Appendix 4.4. This full potential gives a balance of +2,091 dwellings. The main presentation should present both figures: the current 10,306 and the potential, 14,841 and alongside the range from -2,444 to +2,091 or -1,705 to +2,091 units. This amount would meet the proposed requirements. This wide range of projected delivery, the inevitable staged nature of development and the three 5-yr phases, point to a stepped approach where Green Belt is not needed in the first 5 years but a further review during the second 5 years could be considered.	https://wirral-consult.objective.co.uk/file/5659118	https://wirral-consult.objective.co.uk/file/5659119	https://wirral-consult.objective.co.uk/file/5659120	
1242697	LPIO-24687				In general, yes but there are greenfield spaces in West Kirby and elsewhere that should not be in the allocation (SHLAA 3095, 0915), and Fisher's Lane (HLA 703800). Traffic issues are a menace in these areas/adjacent roads. Also, the greenspace is part of the character in these areas. The approach should be - urban regeneration in east Wirral, more exploitation of brownfield sites, development of upper floors above retail outlets, and any harvested use of other land that is neither Green Belt nor green space. Some stakeholder responses to the Council's Strategic Housing Market Assessment (SHMA 2019) have noted that value for money can be obtained from investment in low land value areas with high property demands. There is poor quality lower end housing in the east. The SHMA notes that the eastern settlement areas, including Woodchurch, Liscard and Moreton are relatively affordable. Development in these areas, alongside a greater effort (and getting funds) for the regeneration of the commercial core, river front (in Settlement Areas 2 and 3) is then a great opportunity to meet most of the projected need. The need for regeneration is the point of stakeholders at bullets 8 & 9 on page 187, SHMA 2019. The Council's Expression of Interest for the Gov't's New Development Corporation Competition is a key support for such regeneration.	https://wirral-consult.objective.co.uk/file/5659118	https://wirral-consult.objective.co.uk/file/5659119	https://wirral-consult.objective.co.uk/file/5659120	https://wirral-consult.objective.co.uk/file/5659121

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1242697	LPIO-24723				<p>The Council has failed adequately to respond to public concerns about release of Green Belt in the Development Options Review (DOR). The Cabinet Member for the Local Plan stated at Council on 13 January 2020 that "Public should be key" and she wants to "hear public views". The previous consultation triggered much public opposition to release of Green Belt (i.e. redrawing the boundaries). The meetings (videoed) showed much opposition, as did the one at West Kirby in September which I attended. The Council sought comments and the public provided over 3,000 responses. The Council did not provide a sensible summary of the comments and the reasons for public anger. The Council's publication was simply a verbatim listing of the comments – hardly a form digestible for most people to use. The Issues and Options Document (IOD) simply says that the public gave "...wide array of issues being raised by respondents (with a list)", "...a number were supportive...but many expressed concern...", which does not convey the sense of opposition, in terms of the percentage opposed or the depth of feeling. My study showed overwhelming opposition. My desk top study showed that: about 96% of comments stated reasons for no Green Belt release in their area or generally in Wirral; many noted the golden opportunity at Wirral Waters, Birkenhead and other east Wirral areas which need regeneration; and that there is public anger against the Council for preparing the way for Green Belt release, and proposals for it. The IOD is the first summary by the Council that I have noted of the public responses to the DOR. Senior officers gave earlier assurances that full feedback would be available in Spring 2019. This is lacking in transparency. It contravenes the Government Guidelines for Consultations (section I: "Explain the responses that have been received from consultees and how these have informed the policy"). The IOD implies that it has taken into account the public comments to the DOR. It is only now, post-May 2019 local election results, that the options nudge towards a preferred option of no Green Belt release. The desire to accommodate public criticism should now be met if the officers and Council adhere to the opposing views on Green Belt release. Yet, the IOD does not adequately keep Green Belt out of risk.</p>	https://wirral-consult.objective.co.uk/file/5659118	https://wirral-consult.objective.co.uk/file/5659119	https://wirral-consult.objective.co.uk/file/5659120	https://wirral-consult.objective.co.uk/file/5659121
1248749	LPIO-24878				<p>The approach to promote brownfield development is good to encourage regeneration of eastern parts of the Wirral and should be supported. However, it needs to be achieved in tandem with the release of other, deliverable sites which can come forward in the first 5 years to help counteract the Council's undersupply and provide for the demand in urban settlements. Almost all housing growth from the Council's preferred spatial option is directed to the Commercial Core, which falls within viability Zone 1 and is not generally viable and too little within areas falling within viability Zones 3 and 4, where market and affordable housing is viable. Full details and further evidence of the funding mechanisms will need to be outlined to successfully prove that they are deliverable within the Local Plan period. Most of the new homes are also directed to a zone which cannot support the delivery affordable housing or the financial contributions to provide the necessary infrastructure. The Council's SHMA shows a significant requirement for affordable units in urban settlements outside the Urban Conurbation, which would not be met under Option 1A or Option 1B. We do not consider that the urban intensification approach would deliver the right number and right type of homes required in order to prepare a positive Local Plan. The urban intensification scenario would only look to develop high density schemes, which would not respond to the housing requirements for Wirral and the Liverpool City Region which requires the development of larger family homes. We would question whether this approach is able to pass examination by an Inspector, given the reliance on a small number of large schemes with deliverability issues and our analysis shows that almost half of the housing supply will come from sites that are not yet shown to be deliverable or developable. An alternative strategy needs to be adopted by the Council, to including the release of Green Belt sites over a wider range of areas, which can viably deliver the housing required.</p>	https://wirral-consult.objective.co.uk/file/5684847	https://wirral-consult.objective.co.uk/file/5684848	https://wirral-consult.objective.co.uk/file/5684845	
1248524	LPIO-24915				<p>We understand that high level negotiations are currently taking place with the Ministry for Housing, Communities and Local Government (MHCLG) and the Council to strike a deal that ensures strategic housing delivery and targeted investment and regeneration. This is a good use of public money, as most people agree that we ought not bulldoze our greenfield land in advance of available previously developed sites. We believe that more sites can be identified for inclusion on the brownfield register.</p>	https://wirral-consult.objective.co.uk/file/5684261			
1248769	LPIO-25000				<p>The approach to promote brownfield development is good to encourage regeneration of eastern parts of the Wirral and should be supported. However, it needs to be achieved in tandem with the release of other, deliverable sites which can come forward in the first 5 years to help counteract the Council's undersupply and provide for the demand in urban settlements. Almost all housing growth from the Council's preferred spatial option is directed to the Commercial Core, which falls within viability Zone 1 and is not generally viable and too little within areas falling within viability Zones 3 and 4, where market and affordable housing is viable. Full details and further evidence of the funding mechanisms will need to be outlined to successfully prove that they are deliverable within the Local Plan period. Most of the new homes are also directed to a zone which cannot support the delivery affordable housing or the financial contributions to provide the necessary infrastructure. The Council's SHMA shows a significant requirement for affordable units in urban settlements outside the Urban Conurbation, which would not be met under Option 1A or Option 1B. We do not consider that the urban intensification approach would deliver the right number and right type of homes required in order to prepare a positive Local Plan. The urban intensification scenario would only look to develop high density schemes, which would not respond to the housing requirements for Wirral and the Liverpool City Region which requires the development of larger family homes. We would question whether this approach is able to pass examination by an Inspector, given the reliance on a small number of large schemes with deliverability issues and our analysis shows that almost half of the housing supply will come from sites that are not yet shown to be deliverable or developable. An alternative strategy needs to be adopted by the Council, to including the release of Green Belt sites over a wider range of areas, which can viably deliver the housing required.</p>	https://wirral-consult.objective.co.uk/file/5659045	https://wirral-consult.objective.co.uk/file/5684957	https://wirral-consult.objective.co.uk/file/5659039	https://wirral-consult.objective.co.uk/file/5659038

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1248823	LPIO-25104				The approach to promote brownfield development is good to encourage regeneration of eastern parts of the Wirral and should be supported. However, it needs to be achieved in tandem with the release of other, deliverable sites which can come forward in the first 5 years to help counteract the Council's undersupply and provide for the demand in urban settlements. Almost all housing growth from the Council's preferred spatial option is directed to the Commercial Core, which falls within viability Zone 1 and is not generally viable and too little within areas falling within viability Zones 3 and 4, where market and affordable housing is viable. Full details and further evidence of the funding mechanisms will need to be outlined to successfully prove that they are deliverable within the Local Plan period. Most of the new homes are also directed to a zone which cannot support the delivery affordable housing or the financial contributions to provide the necessary infrastructure. The Council's SHMA shows a significant requirement for affordable units in urban settlements outside the Urban Conurbation, which would not be met under Option 1A or Option 1B. We do not consider that the urban intensification approach would deliver the right number and right type of homes required in order to prepare a positive Local Plan. The urban intensification scenario would only look to develop high density schemes, which would not respond to the housing requirements for Wirral and the Liverpool City Region which requires the development of larger family homes. We would question whether this approach is able to pass examination by an Inspector, given the reliance on a small number of large schemes with deliverability issues and our analysis shows that almost half of the housing supply will come from sites that are not yet shown to be deliverable or developable. An alternative strategy needs to be adopted by the Council, to including the release of Green Belt sites over a wider range of areas, which can viably deliver the housing required.	https://wirral-consult.objective.co.uk/file/5674317	https://wirral-consult.objective.co.uk/file/5684865	https://wirral-consult.objective.co.uk/file/5684849	
1248832	LPIO-25212				The approach to promote brownfield development is good to encourage regeneration of eastern parts of the Wirral and should be supported. However, it needs to be achieved in tandem with the release of other, deliverable sites which can come forward in the first 5 years to help counteract the Council's undersupply and provide for the demand in urban settlements. Almost all housing growth from the Council's preferred spatial option is directed to the Commercial Core, which falls within viability Zone 1 and is not generally viable and too little within areas falling within viability Zones 3 and 4, where market and affordable housing is viable. Full details and further evidence of the funding mechanisms will need to be outlined to successfully prove that they are deliverable within the Local Plan period. Most of the new homes are also directed to a zone which cannot support the delivery affordable housing or the financial contributions to provide the necessary infrastructure. The Council's SHMA shows a significant requirement for affordable units in urban settlements outside the Urban Conurbation, which would not be met under Option 1A or Option 1B. We do not consider that the urban intensification approach would deliver the right number and right type of homes required in order to prepare a positive Local Plan. The urban intensification scenario would only look to develop high density schemes, which would not respond to the housing requirements for Wirral and the Liverpool City Region which requires the development of larger family homes. We would question whether this approach is able to pass examination by an Inspector, given the reliance on a small number of large schemes with deliverability issues and our analysis shows that almost half of the housing supply will come from sites that are not yet shown to be deliverable or developable. An alternative strategy needs to be adopted by the Council, to including the release of Green Belt sites over a wider range of areas, which can viably deliver the housing required.	https://wirral-consult.objective.co.uk/file/5684857	https://wirral-consult.objective.co.uk/file/5659562		
1245083	LPIO-2522	yes			Agree with urban intensification on Wirral Waters and on the land known as Rose Brae.				
1248833	LPIO-25318				The approach to promote brownfield development is good to encourage regeneration of eastern parts of the Wirral and should be supported. However, it needs to be achieved in tandem with the release of other, deliverable sites which can come forward in the first 5 years to help counteract the Council's undersupply and provide for the demand in urban settlements. Almost all housing growth from the Council's preferred spatial option is directed to the Commercial Core, which falls within viability Zone 1 and is not generally viable and too little within areas falling within viability Zones 3 and 4, where market and affordable housing is viable. Full details and further evidence of the funding mechanisms will need to be outlined to successfully prove that they are deliverable within the Local Plan period. Most of the new homes are also directed to a zone which cannot support the delivery affordable housing or the financial contributions to provide the necessary infrastructure. The Council's SHMA shows a significant requirement for affordable units in urban settlements outside the Urban Conurbation, which would not be met under Option 1A or Option 1B. We do not consider that the urban intensification approach would deliver the right number and right type of homes required in order to prepare a positive Local Plan. The urban intensification scenario would only look to develop high density schemes, which would not respond to the housing requirements for Wirral and the Liverpool City Region which requires the development of larger family homes. We would question whether this approach is able to pass examination by an Inspector, given the reliance on a small number of large schemes with deliverability issues and our analysis shows that almost half of the housing supply will come from sites that are not yet shown to be deliverable or developable. An alternative strategy needs to be adopted by the Council, to including the release of Green Belt sites over a wider range of areas, which can viably deliver the housing required.	https://wirral-consult.objective.co.uk/file/5661125	https://wirral-consult.objective.co.uk/file/5661100	https://wirral-consult.objective.co.uk/file/5661124	https://wirral-consult.objective.co.uk/file/5661129

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1248956	LPIO-25383				<p>We agree that the Urban Conurbation should continue to be a priority for regeneration but this has been the Council's strategy for many decades and that strategy alone is not meeting the housing needs of the Borough as a whole and has failed to deliver sufficient homes over many, many years. The Council's preferred option, for urban intensification, effectively plans for the status quo. Many of the sites promoted under the Council's preferred option are not new and have been available for residential development for a considerable period of time and will continue to fail to meet the overall housing requirement of the Borough. Whilst the Commercial Core is a suitable location for growth and an important component of the Urban Conurbation, such a large increase in the resident population is unachievable and unsustainable considering: the lack of existing population, services and facilities - there are no primary schools, no secondary schools, no libraries and only one GP and existing services within the surrounding areas are already utilised by highly populated areas; the market demand for new homes in this area, especially given the required housing mix - creating a new community and a new housing market largely from scratch will not happen swiftly and will not be attractive to many different types of household until essential services are provided; the competition for this type of household from Liverpool City Centre; the lack of past delivery in this area; the associated costs in bringing forward the strategic sites / development areas, with new services and facilities; and the impact on viability and the ability to deliver affordable housing. Almost all housing growth would be directed to Zone 1 which is generally not viable. Very little housing growth is envisaged within the Urban Settlements in Zones 3 and 4, where market and affordable housing is viable, especially on greenfield sites. An alternative strategy needs to be adopted, to release sustainable and suitable Green Belt sites which do not suffer from viability issues and could meet affordable housing needs and deliver larger family homes, to counterbalance the proliferation of smaller units coming forward on urban sites.</p>	https://wirral-consult.objective.co.uk/file/5684859	https://wirral-consult.objective.co.uk/file/5677474		
1248956	LPIO-25384				<p>The Council's preferred spatial option includes sites that have not been shown to be deliverable / developable, from intensification and rescheduling, particularly at Wirral Waters and from potential additional urban housing allocations. A significant amount of work is required to demonstrate that these sites are deliverable and developable, which should have been done already if the Council were intending to make a compelling case. We have considered all the large sites within the Council's claimed supply in our own attached assessment and consider that their ability to deliver units over the plan period is significantly less than the Council envisages.</p>	https://wirral-consult.objective.co.uk/file/5684859	https://wirral-consult.objective.co.uk/file/5677474		
1248956	LPIO-25385				<p>There is a heavy reliance on windfall sites to make up a large element of the supply within the Issues and Options Consultation report. We consider that a total windfall allowance (including new-build windfalls, conversions and changes of use and empty homes) of no more than 10% of the annual requirement should be included going forward. It is generally accepted that no windfall allowance should be included in the first 3 years of a housing supply trajectory to avoid the possibility of double counting. An appropriate windfall allowance would therefore be 960 units (80 units per year from Years 4-15). This is the maximum that we consider appropriate.</p>	https://wirral-consult.objective.co.uk/file/5684859	https://wirral-consult.objective.co.uk/file/5677474		
1246763	LPIO-25402				<p>X welcomes the overall boldness of the approach which has been taken in the Draft Plan, specifically the proposals to release employment land to accommodate the identified shortfall in housing land supply. also welcomes Wirral Council's aspiration for the Borough to create "safe, vibrant communities where people want to live and raise their families" (para 1.7) as well as "opportunities for the Borough to grow, and to achieve a higher quality of living for our residents".</p>				
1248986	LPIO-25528				<p>The approach to promote brownfield development is good to encourage regeneration of eastern parts of the Wirral and should be supported. However, it needs to be achieved in tandem with the release of other, deliverable sites which can come forward in the first 5 years to help counteract the Council's undersupply and provide for the demand in urban settlements. Almost all housing growth from the Council's preferred spatial option is directed to the Commercial Core, which falls within viability Zone 1 and is not generally viable and too little within areas falling within viability Zones 3 and 4, where market and affordable housing is viable. Full details and further evidence of the funding mechanisms will need to be outlined to successfully prove that they are deliverable within the Local Plan period. Most of the new homes are also directed to a zone which cannot support the delivery affordable housing or the financial contributions to provide the necessary infrastructure. The Council's SHMA shows a significant requirement for affordable units in urban settlements outside the Urban Conurbation, which would not be met under Option 1A or Option 1B. We do not consider that the urban intensification approach would deliver the right number and right type of homes required in order to prepare a positive Local Plan. The urban intensification scenario would only look to develop high density schemes, which would not respond to the housing requirements for Wirral and the Liverpool City Region which requires the development of larger family homes. We would question whether this approach is able to pass examination by an Inspector, given the reliance on a small number of large schemes with deliverability issues and our analysis shows that almost half of the housing supply will come from sites that are not yet shown to be deliverable or developable. An alternative strategy needs to be adopted by the Council, to including the release of Green Belt sites over a wider range of areas, which can viably deliver the housing required.</p>	https://wirral-consult.objective.co.uk/file/5662723	https://wirral-consult.objective.co.uk/file/5662725	https://wirral-consult.objective.co.uk/file/5662770	

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1249015	LPIO-25585				A significant amount of work is required to demonstrate that the Council's preferred spatial option is deliverable and developable, which should have been done already if the Council were intending to make a compelling case. Our review shows significant issues with a sizable proportion of the Council's large sites and consider that their ability to deliver units over the plan period is significantly less than the Council envisages. We agree that the Urban Conurbation should continue to be a priority for regeneration but this has been the Council's strategy for many decades and that strategy alone is not meeting the housing needs of the Borough as a whole and has failed to deliver sufficient homes over many, many years. The Council's preferred option, for urban intensification, effectively plans for the status quo. Many of the sites promoted under the Council's preferred option are not new and have been available for residential development for a considerable period of time and will continue to fail to meet the overall housing requirement of the Borough. Whilst the Commercial Core is a suitable location for growth and an important component of the Urban Conurbation, such a large increase in the resident population is unachievable and unsustainable considering: the lack of existing population, services and facilities - there are no primary schools, no secondary schools, no libraries and only one GP and existing services within the surrounding areas are already utilised by highly populated areas; the market demand for new homes in this area, especially given the required housing mix - creating a new community and a new housing market largely from scratch will not happen swiftly and will not be attractive to many different types of household until essential services are provided; the competition for this type of household from Liverpool City Centre; the lack of past delivery in this area; the associated costs in bringing forward the strategic sites / development areas, with new services and facilities; and the impact on viability and the ability to deliver affordable housing. Almost all housing growth would be directed to Zone 1 which is generally not viable. Very little housing growth is envisaged within the Urban Settlements in Zones 3 and 4, where market and affordable housing is viable, especially on greenfield sites. An alternative strategy needs to be adopted, to release sustainable and suitable Green Belt sites which do not suffer from viability issues and could meet affordable housing needs and deliver larger family homes, to counterbalance the proliferation of smaller units coming forward on urban sites.	https://wirral-consult.objective.co.uk/file/5684897			
1249070	LPIO-25672				We agree that the Urban Conurbation should continue to be a priority for regeneration but this has been the Council's strategy for many decades and that strategy alone is not meeting the housing needs of the Borough as a whole and has failed to deliver sufficient homes over many, many years. The Council's preferred option effectively plans for the status quo. Many of the sites promoted under the Council's preferred option are not new and have been available for residential development for a considerable period of time and will continue to fail to meet the overall housing requirement of the Borough and will continue to fail to meet locally identified needs within other urban settlements and villages including Storeton. Almost all housing growth would be directed to Zone 1 which is generally not viable. Very little housing growth is envisaged within the Urban Settlements in Zones 3 and 4, where market and affordable housing is viable, especially on greenfield sites. An alternative strategy needs to be adopted, to release sustainable and suitable Green Belt sites which do not suffer from viability issues and could meet affordable housing needs and deliver larger family homes, to counterbalance the proliferation of smaller units coming forward on urban sites.	https://wirral-consult.objective.co.uk/file/5684896	https://wirral-consult.objective.co.uk/file/5679650		
1249070	LPIO-25673				There is a heavy reliance on windfall sites to make up a large element of the supply within the Issues and Options Consultation report. We consider that a total windfall allowance (including new-build windfalls, conversions and changes of use and empty homes) of no more than 10% of the annual requirement should be included going forward. It is generally accepted that no windfall allowance should be included in the first 3 years of a housing supply trajectory to avoid the possibility of double counting. An appropriate windfall allowance would therefore be 960 units (80 units per year from Years 4-15). This is the maximum that we consider appropriate.	https://wirral-consult.objective.co.uk/file/5684896	https://wirral-consult.objective.co.uk/file/5679650		
1246458	LPIO-25743	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1246459	LPIO-25744	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1249100	LPIO-25912 1 of 3				A significant amount of work is required to demonstrate that the Council's preferred spatial option is deliverable and developable, which should have been done already if the Council were intending to make a compelling case. Our review shows significant issues with a sizable proportion of the Council's large sites and consider that their ability to deliver units over the plan period is significantly less than the Council envisages. We agree that the Urban Conurbation should continue to be a priority for regeneration but this has been the Council's strategy for many decades and that strategy alone is not meeting the housing needs of the Borough as a whole and has failed to deliver sufficient homes over many, many years. The Council's preferred option, for urban intensification, effectively plans for the status quo.	https://wirral-consult.objective.co.uk/file/5677514	https://wirral-consult.objective.co.uk/file/5677512	https://wirral-consult.objective.co.uk/file/5684898	https://wirral-consult.objective.co.uk/file/5684949
1249100	LPIO-25912 2 of 3				Many of the sites promoted under the Council's preferred option are not new and have been available for residential development for a considerable period of time and will continue to fail to meet the overall housing requirement of the Borough. Whilst the Commercial Core is a suitable location for growth and an important component of the Urban Conurbation, such a large increase in the resident population is unachievable and unsustainable considering: the lack of existing population, services and facilities - there are no primary schools, no secondary schools, no libraries and only one GP and existing services within the surrounding areas are already utilised by highly populated areas; the market demand for new homes in this area, especially given the required housing mix	https://wirral-consult.objective.co.uk/file/5677510	https://wirral-consult.objective.co.uk/file/5684895	https://wirral-consult.objective.co.uk/file/5677508	https://wirral-consult.objective.co.uk/file/5677511

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1249100	LPIO-25912 3 of 3				- creating a new community and a new housing market largely from scratch will not happen swiftly and will not be attractive to many different types of household until essential services are provided; the competition for this type of household from Liverpool City Centre; the lack of past delivery in this area; the associated costs in bringing forward the strategic sites / development areas, with new services and facilities; and the impact on viability and the ability to deliver affordable housing. Almost all housing growth would be directed to Zone 1 which is generally not viable. Very little housing growth is envisaged within the Urban Settlements in Zones 3 and 4, where market and affordable housing is viable, especially on greenfield sites. An alternative strategy needs to be adopted, to release sustainable and suitable Green Belt sites which do not suffer from viability issues and could meet affordable housing needs and deliver larger family homes, to counterbalance the proliferation of smaller units coming forward on urban sites.	https://wirral-consult.objective.co.uk/file/5677507			
1249100	LPIO-25913 1 of 3				There is a heavy reliance on windfall sites to make up a large element of the supply within the Issues and Options Consultation report. We consider that a total windfall allowance (including new-build windfalls, conversions and changes of use and empty homes) of no more than 10% of the annual requirement should be included going forward. It is generally accepted that no windfall allowance should be included in the first 3 years of a housing supply trajectory to avoid the possibility of double counting. An appropriate windfall allowance would therefore be 960 units (80 units per year from Years 4-15). This is the maximum that we consider appropriate.	https://wirral-consult.objective.co.uk/file/5677514	https://wirral-consult.objective.co.uk/file/5677512	https://wirral-consult.objective.co.uk/file/5684898	https://wirral-consult.objective.co.uk/file/5684949
1249100	LPIO-25913 2 of 3				There is a heavy reliance on windfall sites to make up a large element of the supply within the Issues and Options Consultation report. We consider that a total windfall allowance (including new-build windfalls, conversions and changes of use and empty homes) of no more than 10% of the annual requirement should be included going forward. It is generally accepted that no windfall allowance should be included in the first 3 years of a housing supply trajectory to avoid the possibility of double counting. An appropriate windfall allowance would therefore be 960 units (80 units per year from Years 4-15). This is the maximum that we consider appropriate.	https://wirral-consult.objective.co.uk/file/5677510	https://wirral-consult.objective.co.uk/file/5684895	https://wirral-consult.objective.co.uk/file/5677508	https://wirral-consult.objective.co.uk/file/5677511
1249100	LPIO-25913 3 of 3				There is a heavy reliance on windfall sites to make up a large element of the supply within the Issues and Options Consultation report. We consider that a total windfall allowance (including new-build windfalls, conversions and changes of use and empty homes) of no more than 10% of the annual requirement should be included going forward. It is generally accepted that no windfall allowance should be included in the first 3 years of a housing supply trajectory to avoid the possibility of double counting. An appropriate windfall allowance would therefore be 960 units (80 units per year from Years 4-15). This is the maximum that we consider appropriate.	https://wirral-consult.objective.co.uk/file/5677507			
1249116	LPIO-25932 1 OF 2				We have significant concerns over the Council's approach in Options 1A/1B. Actual housing need is so much higher and the deliverable supply is so much lower, than the Council claims. Both approaches are fundamentally flawed. The only realistic option for meeting the Borough's overall housing requirement is therefore one which includes appropriate Green Belt release. The Council's assumptions on a large number of sites do not meet the tests of deliverable and developable set out in Annex 2 of the Framework and would flood the market with apartment type development in one specific part of the authority area. Our attachments show significant issues with the viability evidence. It is very unlikely that public funds would be secured to bridge the levels of deficit identified, to deliver a sizable proportion of the large sites (of 20 or more units). The large allowances for three separate categories of unidentified windfalls cannot be included in the trajectory, when the Council has limited control over their availability. We estimate that the Council has a developable supply of just 5,422 units which equates to a 6.78-year supply at best or a 4.17-year supply when considered against the housing requirement we consider necessary, a deficit of 14,078 units over the plan period. The best-case scenario is a 5-year housing land supply position of 2.2 years. The mix of units likely to be delivered by the land supply identified will also not reflect identified needs, with 1- and 2-bedroom units comprising approximately 68%, against a need of between 35-40%. Only 32% of the supply will deliver larger 3- and 4-bedroom units, when the identified need is between 60-65%. Our analysis robustly demonstrates that there is a significant shortfall of developable and deliverable housing land and that significant additional allocations are needed. The identification of additional Green Belt sites is needed to meet the housing requirement and deliver the affordable housing identified in the Council's SHMA.	https://wirral-consult.objective.co.uk/file/5674092	https://wirral-consult.objective.co.uk/file/5674093	https://wirral-consult.objective.co.uk/file/5674095	
1249116	LPIO-25932 2 OF 2				We have significant concerns over the Council's approach in Options 1A/1B. Actual housing need is so much higher and the deliverable supply is so much lower, than the Council claims. Both approaches are fundamentally flawed. The only realistic option for meeting the Borough's overall housing requirement is therefore one which includes appropriate Green Belt release. The Council's assumptions on a large number of sites do not meet the tests of deliverable and developable set out in Annex 2 of the Framework and would flood the market with apartment type development in one specific part of the authority area. Our attachments show significant issues with the viability evidence. It is very unlikely that public funds would be secured to bridge the levels of deficit identified, to deliver a sizable proportion of the large sites (of 20 or more units). The large allowances for three separate categories of unidentified windfalls cannot be included in the trajectory, when the Council has limited control over their availability. We estimate that the Council has a developable supply of just 5,422 units which equates to a 6.78-year supply at best or a 4.17-year supply when considered against the housing requirement we consider necessary, a deficit of 14,078 units over the plan period. The best-case scenario is a 5-year housing land supply position of 2.2 years. The mix of units likely to be delivered by the land supply identified will also not reflect identified needs, with 1- and 2-bedroom units comprising approximately 68%, against a need of between 35-40%. Only 32% of the supply will deliver larger 3- and 4-bedroom units, when the identified need is between 60-65%. Our analysis robustly demonstrates that there is a significant shortfall of developable and deliverable housing land and that significant additional allocations are needed. The identification of additional Green Belt sites is needed to meet the housing requirement and deliver the affordable housing identified in the Council's SHMA.	https://wirral-consult.objective.co.uk/file/5674096	https://wirral-consult.objective.co.uk/file/5684833	https://wirral-consult.objective.co.uk/file/5684836	

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1249116	LPIO-25985 1 OF 2				<p>We have significant concerns over the Council's approach in Options 1A/1B. Actual housing need is so much higher and the deliverable supply is so much lower, than the Council claims. Both approaches are fundamentally flawed. The only realistic option for meeting the Borough's overall housing requirement is therefore one which includes appropriate Green Belt release. The Council's assumptions on a large number of sites do not meet the tests of deliverable and developable set out in Annex 2 of the Framework and would flood the market with apartment type development in one specific part of the authority area. Our attachments show significant issues with the viability evidence. It is very unlikely that public funds would be secured to bridge the levels of deficit identified, to deliver a sizable proportion of the large sites (of 20 or more units). The large allowances for three separate categories of unidentified windfalls cannot be included in the trajectory, when the Council has limited control over their availability. We estimate that the Council has a developable supply of just 5,422 units which equates to a 6.78-year supply at best or a 4.17-year supply when considered against the housing requirement we consider necessary, a deficit of 14,078 units over the plan period. The best-case scenario is a 5-year housing land supply position of 2.2 years. The mix of units likely to be delivered by the land supply identified will also not reflect identified needs, with 1- and 2-bedroom units comprising approximately 68%, against a need of between 35-40%. Only 32% of the supply will deliver larger 3- and 4-bedroom units, when the identified need is between 60-65%. Our analysis robustly demonstrates that there is a significant shortfall of developable and deliverable housing land and that significant additional allocations are needed. The identification of additional Green Belt sites is needed to meet the housing requirement and deliver the affordable housing identified in the Council's SHMA.</p>	https://wirral-consult.objective.co.uk/file/5675698	https://wirral-consult.objective.co.uk/file/5675693	https://wirral-consult.objective.co.uk/file/5675700	https://wirral-consult.objective.co.uk/file/5675692
1249116	LPIO-25985 2 OF 2				<p>We have significant concerns over the Council's approach in Options 1A/1B. Actual housing need is so much higher and the deliverable supply is so much lower, than the Council claims. Both approaches are fundamentally flawed. The only realistic option for meeting the Borough's overall housing requirement is therefore one which includes appropriate Green Belt release. The Council's assumptions on a large number of sites do not meet the tests of deliverable and developable set out in Annex 2 of the Framework and would flood the market with apartment type development in one specific part of the authority area. Our attachments show significant issues with the viability evidence. It is very unlikely that public funds would be secured to bridge the levels of deficit identified, to deliver a sizable proportion of the large sites (of 20 or more units). The large allowances for three separate categories of unidentified windfalls cannot be included in the trajectory, when the Council has limited control over their availability. We estimate that the Council has a developable supply of just 5,422 units which equates to a 6.78-year supply at best or a 4.17-year supply when considered against the housing requirement we consider necessary, a deficit of 14,078 units over the plan period. The best-case scenario is a 5-year housing land supply position of 2.2 years. The mix of units likely to be delivered by the land supply identified will also not reflect identified needs, with 1- and 2-bedroom units comprising approximately 68%, against a need of between 35-40%. Only 32% of the supply will deliver larger 3- and 4-bedroom units, when the identified need is between 60-65%. Our analysis robustly demonstrates that there is a significant shortfall of developable and deliverable housing land and that significant additional allocations are needed. The identification of additional Green Belt sites is needed to meet the housing requirement and deliver the affordable housing identified in the Council's SHMA.</p>	https://wirral-consult.objective.co.uk/file/5675697	https://wirral-consult.objective.co.uk/file/5675694	https://wirral-consult.objective.co.uk/file/5675696	
1249116	LPIO-26034 1 OF 2				<p>We have significant concerns over the Council's approach in Options 1A/1B. Actual housing need is so much higher and the deliverable supply is so much lower, than the Council claims. Both approaches are fundamentally flawed. The only realistic option for meeting the Borough's overall housing requirement is therefore one which includes appropriate Green Belt release. The Council's assumptions on a large number of sites do not meet the tests of deliverable and developable set out in Annex 2 of the Framework and would flood the market with apartment type development in one specific part of the authority area. Our attachments show significant issues with the viability evidence. It is very unlikely that public funds would be secured to bridge the levels of deficit identified, to deliver a sizable proportion of the large sites (of 20 or more units). The large allowances for three separate categories of unidentified windfalls cannot be included in the trajectory, when the Council has limited control over their availability. We estimate that the Council has a developable supply of just 5,422 units which equates to a 6.78-year supply at best or a 4.17-year supply when considered against the housing requirement we consider necessary, a deficit of 14,078 units over the plan period. The best-case scenario is a 5-year housing land supply position of 2.2 years. The mix of units likely to be delivered by the land supply identified will also not reflect identified needs, with 1- and 2-bedroom units comprising approximately 68%, against a need of between 35-40%. Only 32% of the supply will deliver larger 3- and 4-bedroom units, when the identified need is between 60-65%. Our analysis robustly demonstrates that there is a significant shortfall of developable and deliverable housing land and that significant additional allocations are needed. The identification of additional Green Belt sites is needed to meet the housing requirement and deliver the affordable housing identified in the Council's SHMA.</p>	https://wirral-consult.objective.co.uk/file/5684802	https://wirral-consult.objective.co.uk/file/5684835	https://wirral-consult.objective.co.uk/file/5677041	

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1249116	LPIO-26034 2 OF 2				<p>We have significant concerns over the Council's approach in Options 1A/1B. Actual housing need is so much higher and the deliverable supply is so much lower, than the Council claims. Both approaches are fundamentally flawed. The only realistic option for meeting the Borough's overall housing requirement is therefore one which includes appropriate Green Belt release. The Council's assumptions on a large number of sites do not meet the tests of deliverable and developable set out in Annex 2 of the Framework and would flood the market with apartment type development in one specific part of the authority area. Our attachments show significant issues with the viability evidence. It is very unlikely that public funds would be secured to bridge the levels of deficit identified, to deliver a sizable proportion of the large sites (of 20 or more units). The large allowances for three separate categories of unidentified windfalls cannot be included in the trajectory, when the Council has limited control over their availability. We estimate that the Council has a developable supply of just 5,422 units which equates to a 6.78-year supply at best or a 4.17-year supply when considered against the housing requirement we consider necessary, a deficit of 14,078 units over the plan period. The best-case scenario is a 5-year housing land supply position of 2.2 years. The mix of units likely to be delivered by the land supply identified will also not reflect identified needs, with 1- and 2-bedroom units comprising approximately 68%, against a need of between 35-40%. Only 32% of the supply will deliver larger 3- and 4-bedroom units, when the identified need is between 60-65%. Our analysis robustly demonstrates that there is a significant shortfall of developable and deliverable housing land and that significant additional allocations are needed. The identification of additional Green Belt sites is needed to meet the housing requirement and deliver the affordable housing identified in the Council's SHMA.</p>	https://wirral-consult.objective.co.uk/file/5677037	https://wirral-consult.objective.co.uk/file/5684804		
1249116	LPIO-26067 1 OF 2				<p>We have significant concerns over the Council's approach in Options 1A/1B. Actual housing need is so much higher and the deliverable supply is so much lower, than the Council claims. Both approaches are fundamentally flawed. The only realistic option for meeting the Borough's overall housing requirement is therefore one which includes appropriate Green Belt release. The Council's assumptions on a large number of sites do not meet the tests of deliverable and developable set out in Annex 2 of the Framework and would flood the market with apartment type development in one specific part of the authority area. Our attachments show significant issues with the viability evidence. It is very unlikely that public funds would be secured to bridge the levels of deficit identified, to deliver a sizable proportion of the large sites (of 20 or more units). The large allowances for three separate categories of unidentified windfalls cannot be included in the trajectory, when the Council has limited control over their availability. We estimate that the Council has a developable supply of just 5,422 units which equates to a 6.78-year supply at best or a 4.17-year supply when considered against the housing requirement we consider necessary, a deficit of 14,078 units over the plan period. The best-case scenario is a 5-year housing land supply position of 2.2 years. The mix of units likely to be delivered by the land supply identified will also not reflect identified needs, with 1- and 2-bedroom units comprising approximately 68%, against a need of between 35-40%. Only 32% of the supply will deliver larger 3- and 4-bedroom units, when the identified need is between 60-65%. Our analysis robustly demonstrates that there is a significant shortfall of developable and deliverable housing land and that significant additional allocations are needed. The identification of additional Green Belt sites is needed to meet the housing requirement and deliver the affordable housing identified in the Council's SHMA.</p>	https://wirral-consult.objective.co.uk/file/5674240	https://wirral-consult.objective.co.uk/file/5684832	https://wirral-consult.objective.co.uk/file/5674256	
1249116	LPIO-26067 2 OF 2				<p>We have significant concerns over the Council's approach in Options 1A/1B. Actual housing need is so much higher and the deliverable supply is so much lower, than the Council claims. Both approaches are fundamentally flawed. The only realistic option for meeting the Borough's overall housing requirement is therefore one which includes appropriate Green Belt release. The Council's assumptions on a large number of sites do not meet the tests of deliverable and developable set out in Annex 2 of the Framework and would flood the market with apartment type development in one specific part of the authority area. Our attachments show significant issues with the viability evidence. It is very unlikely that public funds would be secured to bridge the levels of deficit identified, to deliver a sizable proportion of the large sites (of 20 or more units). The large allowances for three separate categories of unidentified windfalls cannot be included in the trajectory, when the Council has limited control over their availability. We estimate that the Council has a developable supply of just 5,422 units which equates to a 6.78-year supply at best or a 4.17-year supply when considered against the housing requirement we consider necessary, a deficit of 14,078 units over the plan period. The best-case scenario is a 5-year housing land supply position of 2.2 years. The mix of units likely to be delivered by the land supply identified will also not reflect identified needs, with 1- and 2-bedroom units comprising approximately 68%, against a need of between 35-40%. Only 32% of the supply will deliver larger 3- and 4-bedroom units, when the identified need is between 60-65%. Our analysis robustly demonstrates that there is a significant shortfall of developable and deliverable housing land and that significant additional allocations are needed. The identification of additional Green Belt sites is needed to meet the housing requirement and deliver the affordable housing identified in the Council's SHMA.</p>	https://wirral-consult.objective.co.uk/file/5684834	https://wirral-consult.objective.co.uk/file/5684837		
1241821	LPIO-26109				<p>The consultation document makes it clear that the preferred option is Urban Intensification without Green Belt release and sets out what is required in order to achieve that option. It also hedges its bet that, in the event that some Green Belt release is required, the solution could be a hybrid of the various options. The qualification of the first sentence by the second; this hedging of bet, is a disappointment. The Council should have the courage to take a stand on its environmental and heritage assets; concentrate on development where it is needed. It is now clear that the Council has the opportunity and evidence to make a case on grounds of exception to ensure that the peninsula retains its character with its long standing Green Belt intact.</p>				
1249271	LPIO-26128 1 of 4				<p>From the evidence provided, it is not clear why alternative options have been discounted. Strengths and weaknesses are outlined for each option but there is little analysis of the options as a whole. Table 4.1 clearly demonstrates that even against a minimum plan period requirement of 12,000 dwellings (which we consider to be inadequate) only land for 10,306 can be identified (assuming those are all deliverable); by the Council's own calculations there is an obvious shortfall of 2,444 dwellings (or approximately one fifth) against the supply identified as its preferred option.</p>	https://wirral-consult.objective.co.uk/file/5677492	https://wirral-consult.objective.co.uk/file/5678239	https://wirral-consult.objective.co.uk/file/5678247	https://wirral-consult.objective.co.uk/file/5684889

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1249271	LPIO-26128 2 of 4				Neither the Draft Local Plan, nor supporting evidence base, provides any meaningful indication as to where these dwellings are likely to be delivered, despite the supply already seeking to rely on windfall sites coming forward. The preferred strategy relies on a series of complex and time-consuming options to fall into place to succeed.	https://wirral-consult.objective.co.uk/file/5677491	https://wirral-consult.objective.co.uk/file/5677493	https://wirral-consult.objective.co.uk/file/5678242	https://wirral-consult.objective.co.uk/file/5684854
1249271	LPIO-26128 3 of 4				Many of these options are beyond the control of the Council and rely on third parties, including the allocation of funding or the winning of bids and no evidence has been provided on how or when these issues will be resolved. Sufficient deliverable sites have not yet been identified. Given the level of uncertainty and the level of housing required within the first five years of the Plan, it is unclear upon what basis the Council has decided to proceed with its preferred option, which appears to be the only option that it has considered in any depth.	https://wirral-consult.objective.co.uk/file/5677494	https://wirral-consult.objective.co.uk/file/5685010	https://wirral-consult.objective.co.uk/file/5678243	https://wirral-consult.objective.co.uk/file/5678240
1249271	LPIO-26128 4 of 4				Given that the Council has no certainty that it will be able to deliver on Option 1A we suggest that it should be discounted as a reasonable alternative for the Local Plan. The Council must identify an Option which, as a minimum, is likely to meet its minimum housing requirement derived from the Standard Methodology OAN.	https://wirral-consult.objective.co.uk/file/5678238			
1249271	LPIO-26129 1 of 4				The delivery of urban sites and high-density development in sustainable areas cannot replace the need for development to deliver a balanced housing market elsewhere within the Borough, to meet development needs across the board. It is highly likely that a high proportion of development on the Council's identified sites will need to take the form of apartments, which will not meet all the needs of the Borough, particularly in settlements outside the main urban areas. Reliance on such sites will not deliver the 60% houses and 18% bungalows that are needed across the Borough and the Local Plan must have regard to meeting the need for specific types and tenures of accommodation; including affordable housing and housing for specific groups identified in the Council's Strategic Housing Market Assessment (SHMA).	https://wirral-consult.objective.co.uk/file/5677492	https://wirral-consult.objective.co.uk/file/5678239	https://wirral-consult.objective.co.uk/file/5678247	https://wirral-consult.objective.co.uk/file/5684889
1249271	LPIO-26129 2 of 4				The Council's proposed strategy does not seek to allocate a meaningful proportion of development to the remainder of the settlement hierarchy. It is clear from the evidence within the SHMA that a lack of sites within these areas does not mean that a need does not exist in these locations. The need for housing delivery to meet identified local needs in these areas, is considered to comprise the 'exceptional circumstances' required to justify a review of the Green Belt where needs have been identified in settlements where insufficient urban land exists. The Council's over reliance on urban intensification will result in an unsustainable development pattern by excluding communities outside of the main focus of regeneration.	https://wirral-consult.objective.co.uk/file/5677491	https://wirral-consult.objective.co.uk/file/5677493	https://wirral-consult.objective.co.uk/file/5678242	https://wirral-consult.objective.co.uk/file/5684854
1249271	LPIO-26129 3 of 4				The Council's SHMA, for example, shows a net annual shortfall of 55 affordable homes within Hoylake and West Kirby. Additional housing development will be required in those other settlements, to help sustain their vitality and viability, reduce the widening affordability gap, deliver affordable homes and meet the need for choice and for larger, higher value aspirational family homes, in areas well connected by road and rail to Wirral's interdependent neighbours at Liverpool and Cheshire West.	https://wirral-consult.objective.co.uk/file/5677494	https://wirral-consult.objective.co.uk/file/5685010	https://wirral-consult.objective.co.uk/file/5678243	https://wirral-consult.objective.co.uk/file/5678240
1249271	LPIO-26129 4 of 4				Wirral, along with other boroughs within Liverpool City Region (LCR), will have a combined role to play in delivering the types of housing which cannot be met within Liverpool, which will inevitably require the release of new greenfield sites to provide larger and higher value aspirational housing required within the LCR, particularly given Wirral's current reliance on predominantly higher density, apartment-led schemes, such as at Wirral Waters. The Council should abandon its pursuit of Option 1A as its preferred strategy in favour of a hybrid Option that delivers urban intensification but also utilises Green Belt land to provide the housing growth that the Borough needs, across the Borough, in line with the Council's settlement hierarchy	https://wirral-consult.objective.co.uk/file/5678238			
1249271	LPIO-26130 1 of 4				The 20% buffer should not be discounted from the future supply, contrary to the aims and purpose of paragraph 73 of the NPPF.	https://wirral-consult.objective.co.uk/file/5677492	https://wirral-consult.objective.co.uk/file/5678239	https://wirral-consult.objective.co.uk/file/5678247	https://wirral-consult.objective.co.uk/file/5684889
1249271	LPIO-26130 2 of 4				The 20% buffer should not be discounted from the future supply, contrary to the aims and purpose of paragraph 73 of the NPPF.	https://wirral-consult.objective.co.uk/file/5677491	https://wirral-consult.objective.co.uk/file/5677493	https://wirral-consult.objective.co.uk/file/5678242	https://wirral-consult.objective.co.uk/file/5684854
1249271	LPIO-26130 3 of 4				The 20% buffer should not be discounted from the future supply, contrary to the aims and purpose of paragraph 73 of the NPPF.	https://wirral-consult.objective.co.uk/file/5677494	https://wirral-consult.objective.co.uk/file/5685010	https://wirral-consult.objective.co.uk/file/5678243	https://wirral-consult.objective.co.uk/file/5678240
1249271	LPIO-26130 4 of 4				The 20% buffer should not be discounted from the future supply, contrary to the aims and purpose of paragraph 73 of the NPPF.	https://wirral-consult.objective.co.uk/file/5678238			

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1249269	LPIO-26148				Although there is no dispute that regeneration should be encouraged, there appears to be an over-reliance on brownfield sites in and around Birkenhead to meet a large proportion of the Borough's housing needs, where there is a high degree of uncertainty around deliverability, which will have a significant impact on the 5-year housing land supply in particular. Many of the sites included would flood the market with small 1 and 2 bedroom developments (which currently comprise up to 68% of the total supply) in one specific part of the authority and the Council are not disaggregating or distributing the housing requirement appropriately across the settlement hierarchy, which is simply based on delivering a quantum of development rather than delivering the right homes in the right locations, which will not address the need to deliver larger properties (at 60-65% of identified needs) or a larger proportion of affordable housing over the Plan period. No compelling evidence has been provided to justify the allowances for unidentified windfalls, which should not be included in the early years of the Plan period to avoid double counting; net conversions or changes of use, which does not align with the protection of existing employment sites or meet the need for larger properties; or bringing empty properties back into use, which is not realistic or deliverable. There is already a shortfall of 2,444 dwellings over the Plan period. The analysis of the land supply and allowances set out in our attachments shows the shortfall is closer to 7,209 dwellings. The Council should not therefore pursue a strategy which focuses solely on the redevelopment of brownfield sites and will need to release additional land to ensure there is not a shortfall in housing delivery and ensure the Borough's identified housing needs are met, particularly within the early years of the Plan period.	https://wirral-consult.objective.co.uk/file/5675699			
1249263	LPIO-26179				From the evidence provided, it is not clear why alternative options have been discounted. Strengths and weaknesses are outlined for each option but there is little analysis of the options as a whole. Table 4.1 clearly demonstrates that even against a minimum plan period requirement of 12,000 dwellings (which we consider to be inadequate) only land for 10,306 can be identified (assuming those are all deliverable); by the Council's own calculations there is an obvious shortfall of 2,444 dwellings (or approximately one fifth) against the supply identified as its preferred option. Neither the Draft Local Plan, nor supporting evidence base, provides any meaningful indication as to where these dwellings are likely to be delivered, despite the supply already seeking to rely on windfall sites coming forward. The preferred strategy relies on a series of complex and time-consuming options to fall into place to succeed. Many of these options are beyond the control of the Council and rely on third parties, including the allocation of funding or the winning of bids and no evidence has been provided on how or when these issues will be resolved. Sufficient deliverable sites have not yet been identified. Given the level of uncertainty and the level of housing required within the first five years of the Plan, it is unclear upon what basis the Council has decided to proceed with its preferred option, which appears to be the only option that it has considered in any depth. Given that the Council has no certainty that it will be able to deliver on Option 1A we suggest that it should be discounted as a reasonable alternative for the Local Plan. The Council must identify an Option which, as a minimum, is likely to meet its minimum housing requirement derived from the Standard Methodology OAN.	https://wirral-consult.objective.co.uk/file/5684852			
1249263	LPIO-26180 1 of 2				The delivery of urban sites and high-density development in sustainable areas cannot replace the need for development to deliver a balanced housing market elsewhere within the Borough, to meet development needs across the board. It is highly likely that a high proportion of development on the Council's identified sites will need to take the form of apartments, which will not meet all the needs of the Borough, particularly in settlements outside the main urban areas. Reliance on such sites will not deliver the 60% houses and 18% bungalows that are needed across the Borough and the Local Plan must have regard to meeting the need for specific types and tenures of accommodation; including affordable housing and housing for specific groups identified in the Council's Strategic Housing Market Assessment (SHMA). The Council's proposed strategy does not seek to allocate a meaningful proportion of development to the remainder of the settlement hierarchy. It is clear from the evidence within the SHMA that a lack of sites within these areas does not mean that a need does not exist in these locations. The need for housing delivery to meet identified local needs in these areas, is considered to comprise the 'exceptional circumstances' required to justify a review of the Green Belt where needs have been identified in settlements where insufficient urban land exists.	https://wirral-consult.objective.co.uk/file/5684852			
1249263	LPIO-26180 2 of 2				The Council's over reliance on urban intensification will result in an unsustainable development pattern by excluding communities outside of the main focus of regeneration, such as Eastham and other more deprived communities, such as Mill Park to the south of Eastham. The Council's SHMA, for example, shows a net annual shortfall of 71 affordable homes within Bromborough and Eastham. Additional housing development will be required in those other settlements, to help sustain their vitality and viability, reduce the widening affordability gap, deliver affordable homes and meet the need for choice and for larger, higher value aspirational family homes, in areas well connected by road and rail to Wirral's interdependent neighbours at Liverpool and Cheshire West. Wirral, along with other boroughs within Liverpool City Region (LCR), will have a combined role to play in delivering the types of housing which cannot be met within Liverpool, which will inevitably require the release of new greenfield sites to provide larger and higher value aspirational housing required within the LCR, particularly given Wirral's current reliance on predominantly higher density, apartment-led schemes, such as at Wirral Waters. The Council should abandon its pursuit of Option 1A as its preferred strategy in favour of a hybrid Option that delivers urban intensification but also utilises Green Belt land to provide the housing growth that the Borough needs, across the Borough, in line with the Council's settlement hierarchy.				
1249263	LPIO-26181				The 20% buffer should not be discounted from the future supply, contrary to the aims and purpose of paragraph 73 of the NPPF.	https://wirral-consult.objective.co.uk/file/5684852			
1249309	LPIO-26194	yes							
1249315	LPIO-26203	yes							

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1247414	LPIO-26242				Urban intensification would be brilliant on Wirral Waters and on the land known as Rose Brae. It would make a fabulous skyline on the Wirral Banks of the River Mersey and Birkenhead far more attractive, bringing business and breathing life back into a very dull dark area.				
1248490	LPIO-26330				Strongly oppose the inclusion of a separate source of supply in the trajectory for conversions and change of use, which simply comprise windfall sites. As the Council has not released evidence to justify the supply of 1,200 units from this source (equivalent to 10% of the overall requirement), aside from limited analysis put forward in the 2019SHLAA, it is difficult to interrogate the merits of their inclusion and there is no merit or justification for their inclusion.	https://wirral-consult.objective.co.uk/file/5676992	https://wirral-consult.objective.co.uk/file/5673252	https://wirral-consult.objective.co.uk/file/5673251	https://wirral-consult.objective.co.uk/file/5684856
1248490	LPIO-26331				The Council is relying on a significant number of brownfield office and industrial sites to make up a proportion of their developable supply. The inclusion of an additional allowance in conjunction with the identified sites and windfall sites is likely to result in significant levels of double counting. The inclusion of an allowance of 10% of the housing requirement for the conversion and change of use of commercial space is at variance with Strategic Objective 11, to 'Provide a range of employment and mixed-use sites to meet assessed needs, provide work opportunities for our residents and foster an environment where our existing businesses and new innovative start-ups can prosper'; the 'Preferred Approach' for existing employment areas, to 'seek to protect all sites currently in use, or allocated, for employment and resist development change of use to ensure continuation of employment uses for those sites'; and is at complete variance with the Council's economic aspirations. Some units may come forward through permitted development rights, but the Council should not be relying on them to deliver 10% of the Council's housing requirement.	https://wirral-consult.objective.co.uk/file/5676992	https://wirral-consult.objective.co.uk/file/5673252	https://wirral-consult.objective.co.uk/file/5673251	https://wirral-consult.objective.co.uk/file/5684856
1248490	LPIO-26332				Without a substantive evidence based document to justify the proportion of windfall sites being released by the Council as part of this consultation exercise, it is very difficult to determine if 70 units per year is an appropriate allowance. The limited analysis set out in the 2019 SHLAA does not represent 'compelling evidence' and cannot be relied upon to justify the Council's position. The limited analysis put forward in the 2019 SHLAA does not represent 'compelling evidence' for including a separate allowance of 80 units per year for conversions and changes of uses.	https://wirral-consult.objective.co.uk/file/5676992	https://wirral-consult.objective.co.uk/file/5673252	https://wirral-consult.objective.co.uk/file/5673251	https://wirral-consult.objective.co.uk/file/5684856
1248490	LPIO-26338				Much of the Council's claimed supply is based on a 'Potential Future Position' trajectory which is not underpinned by the 2019 SHLAA or any other evidence base documents released for consultation. A number of sites have been 'intensified and rescheduled' without evidence to justify the increased densities or revised delivery trajectory. The Council have unjustifiably included 'Potential Additional Urban Housing Allocations', which includes a number of sites that the 2019 SHLAA describes as 'unviable'. Many of these sites have been included in the supply without obtaining evidence to justify that they are now 'developable'. Where the Council's own up-to-date evidence suggests a site is not developable, its inclusion in the housing supply is unjustified and needs to be removed to avoid a distortion of the Council's potential supply. The assessments of capacity and trajectory in the 2019 SHLAA are more appropriate than the new assessments brought forward for the WLPIO less than a year on from the base date of the SHLAA. While it is accepted that the results of the tests of 'deliverability' and 'developability' are likely to change for some sites, to include an additional 4,535 units from 'intensification, rescheduling and the inclusion of additional urban allocations' represents a strong deviation away from the evidence set out in the 2019 SHLAA, which is inappropriate and unjustified.	https://wirral-consult.objective.co.uk/file/5676992	https://wirral-consult.objective.co.uk/file/5673252	https://wirral-consult.objective.co.uk/file/5673251	https://wirral-consult.objective.co.uk/file/5684856
1248490	LPIO-26339				Copies of Peel's representations on the trajectory for the delivery of Wirral Waters have not been made available to view and comment on as part of the Issues and Options Consultation. The concealment of this information could be a procedural issue and it should be publicly available as evidence if the Council are relying on it to bolster their supply. We do not agree that this information is private and given the importance of Peel's representations in seeking to justify a higher number of developable units from Wirral Waters it should form part of the Council's evidence. The Council's concealment of Peel's trajectory is unjustified given its significance to the overall land supply. The longer the evidence underpinning the revised trajectory is remains inaccessible, the more concerns grow over the validity of the supply from the Wirral Waters Strategic Site.	https://wirral-consult.objective.co.uk/file/5676992	https://wirral-consult.objective.co.uk/file/5673252	https://wirral-consult.objective.co.uk/file/5673251	https://wirral-consult.objective.co.uk/file/5684856
1248490	LPIO-26340				The preferred approach will not deliver the right amount of affordable housing. The inclusion of a large number of conversions and change of use is also unlikely to be able to deliver the types of homes needed and provide sufficient amounts of affordable housing. The 2020 SHMA outlines that the net affordable housing need for Wirral is 705 per annum. The Council's preferred approach is to seek 30% affordable housing on all schemes of 10 or more dwellings. Of the 17 sites with planning permission and a capacity of over 20 dwellings, 393 of the 1,819 dwellings will comprise affordable dwellings. This equates to 21.6% of the supply. Five of these sites are coming forward as 100% affordable schemes and account for 198 of the 393 affordable units (50% of the provision). A number of the sites offering none, or limited, on-site affordable housing would indicate that there are significant viability issues associated with the incorporation of affordable units on PDL sites in Wirral. An alternative strategy for delivering affordable homes needs to be adopted by the Council.	https://wirral-consult.objective.co.uk/file/5676992	https://wirral-consult.objective.co.uk/file/5673252	https://wirral-consult.objective.co.uk/file/5673251	https://wirral-consult.objective.co.uk/file/5684856
1248490	LPIO-26341				There are considerable concerns with a significant proportion of the sites included in the Council's supply and setting aside the potential for flooding the market with apartment type development in one specific part of the authority area, the Council's assumptions on a large number of sites are flawed and do not meet the tests of deliverable and developable as set out in Annex 2 of the Framework. Our experience and local knowledge indicates that the actual developable supply is significantly less than envisaged by the Council.	https://wirral-consult.objective.co.uk/file/5676992	https://wirral-consult.objective.co.uk/file/5673252	https://wirral-consult.objective.co.uk/file/5673251	https://wirral-consult.objective.co.uk/file/5684856

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1248490	LPIO-26342				The Council are claiming a supply of 719 units from sites with a capacity of less than 20 units. The combined total supply from sites with capacity of less than 20 units is 719 (5% of the LHN requirement). A significant proportion of the smaller sites benefit from planning permission but not all. Some have been included in the latter years (year 6-10 and 11-15) of the Council's supply. The Council has included all small sites (less than 20 units) with planning permission in their trajectory but have not included any non-delivery allowance into the trajectory. This is a very risky strategy given the likelihood that small sites often receive planning permission but aren't delivered and does not represent a pragmatic approach. The Council are also pursuing a significant windfall allowance and do not appear to be grasping the issue of a finite supply of small sites being available to deliver in Wirral. The majority of windfall sites tend to be smaller sites and such, there is a high likelihood for double counting which will affect the Council's ability to meet its housing needs. A minimum reduction of a 10% lapse rate needs to be factored into the trajectory in the WLP. This would reduce the proposed supply from sites of less than 20 units by 72 units, which needs to be reflected in the next iteration of the WLP.	https://wirral-consult.objective.co.uk/file/5676992	https://wirral-consult.objective.co.uk/file/5673252	https://wirral-consult.objective.co.uk/file/5673251	https://wirral-consult.objective.co.uk/file/5684856
1248490	LPIO-26343				There are issues with some of the other large (20+ units) sites included in the Council's trajectory. We have prepared our own delivery trajectory which differs significantly from the Council's. A detailed justification for the sites with the biggest changes is set out in our attachment, including detailed proformas for each site and comments have been recorded for each site under questions 4.2 and 4.3.	https://wirral-consult.objective.co.uk/file/5676992	https://wirral-consult.objective.co.uk/file/5673252	https://wirral-consult.objective.co.uk/file/5673251	https://wirral-consult.objective.co.uk/file/5684856
1248490	LPIO-26344				Our analysis shows a discrepancy of 458 dwellings between the figures listed in WLPIO Table 4.2 and the total supply from sites listed in WLPIO Appendix 4.5 'Wirral Local Plan Housing Trajectory' for years 1 to 5, with the total supply in Appendix 4.5 falling 458 units short of the figure set out in WLPIO Table 4.2, which needs to be resolved. We have assumed that the 458 dwellings relate to the statement in Appendix 4.5 (p.16) which states 'Excludes sites with permission in the Green Belt and sites where construction had already begun at April 2019' but this information has not been made available for comment as part of this consultation. Whilst it is probable that the majority of sites where construction had begun at April 2019 will be delivered, it is unlikely that all the sites with planning permission in the Green Belt will be delivered within years 1 to 5 of the WLP.	https://wirral-consult.objective.co.uk/file/5676992	https://wirral-consult.objective.co.uk/file/5673252	https://wirral-consult.objective.co.uk/file/5673251	https://wirral-consult.objective.co.uk/file/5684856
1248490	LPIO-26351				The preferred approach will not deliver the right amount of new dwellings. In terms of supply over the plan period, we consider that the Council has a developable supply of just 5,422 units which equates to a 6.78-year supply at best or a 4.17-year supply when considered against the housing requirement we consider is necessary [shown in Figure 5.1 contained in our attachment] due to the Council's economic aspirations and the significant affordable housing requirement. As a best-case scenario the Council can only demonstrate an equivalent 5-year housing land supply of 2.2 years or only 1.36 years against the housing requirement we consider necessary. If the Local Plan is pursued without significant additional allocations it will not be found sound at examination.	https://wirral-consult.objective.co.uk/file/5676992	https://wirral-consult.objective.co.uk/file/5673252	https://wirral-consult.objective.co.uk/file/5673251	https://wirral-consult.objective.co.uk/file/5684856
1248490	LPIO-26352				The preferred approach will not deliver the right amount of affordable housing. Furthermore, the inclusion of a large number of conversions and change of use is unlikely to be able to deliver the types of homes needed and provide sufficient amounts of affordable housing	https://wirral-consult.objective.co.uk/file/5676992	https://wirral-consult.objective.co.uk/file/5673252	https://wirral-consult.objective.co.uk/file/5673251	https://wirral-consult.objective.co.uk/file/5684856
1248490	LPIO-26353				Welcome the inclusion of the demolition allowance within the Council's trajectory in Tables 4.1 and 4.2 and Appendix 4.4 and request that this remains in the trajectory as the Local Plan evolves.	https://wirral-consult.objective.co.uk/file/5676992	https://wirral-consult.objective.co.uk/file/5673252	https://wirral-consult.objective.co.uk/file/5673251	https://wirral-consult.objective.co.uk/file/5684856
1249745	LPIO-26382				We are concerned that the stated quantum of 'deliverable' and 'developable' sites does not meet the Borough's needs over the plan period, and by extension is concerned that the requisite amount of housing land is not available within the urban area to meet the Borough's needs. Overall, we do not agree with the preferred approach. We have considerable concerns with the development trajectory for the majority of the sites included in the Council's supply. Setting aside the potential for flooding the market with apartment type development in one specific part of the authority area, the Council's assumptions on a large number of sites are flawed and do not meet the tests of deliverable and developable as set out in Annex 2 of the Framework. We have significant issues with a sizable proportion of the Council's large sites (sites of 20 or more units) and consider that their ability to deliver units over the plan period is significantly less than the Council envisages. Furthermore, in an effort to bolster the Council's claimed supply, they have split windfalls into three separate categories and unjustifiably included proportionately large allowances within each.	https://wirral-consult.objective.co.uk/file/5680005	https://wirral-consult.objective.co.uk/file/5684864	https://wirral-consult.objective.co.uk/file/5684863	https://wirral-consult.objective.co.uk/file/5680006
1249746	LPIO-26402 1 of 3				The questions by the Council under section 4 go straight into specific options for Green Belt release, without any opportunity provided to respond on the need for Green Belt release, the overall approach which should be taken to this if required, or the selection of individual sites. It follows from the representations made by the Consortium, that Wirral's housing needs are incapable of being met within the existing urban area. Firstly, the Consortium's compelling evidence is that actual housing need is at least 1,300 per annum; Secondly, having regard to the calibre of the sites identified by the Council, this actual level of housing needs indicates a shortfall of over 14,000 dwellings over the plan period, whilst even the housing requirement identified by the Council produces a shortfall of over 6,500 dwellings; Thirdly, the identified sites cannot achieve the required mix. As set out in the Consortium evidence, the units likely to be delivered from the Council's developable supply will be predominantly 1- and 2-bedroom units (68%) compared with a need of between 35-40%. Conversely, the proportion of 3- and 4-bedroom units being developable from the supply (32%) falls well below the actual need of 60 to 65%; Fourthly, based on the sites with capacity of 20 units or more with permission, it is likely that less than 10% of the identified affordable housing need in Wirral will be met, based on the current supply. A limited number of affordable completions on smaller sites will only make a modest contribution. Larger and viable greenfield sites will achieve substantially greater affordable delivery along with a broader housing mix. These factors together clearly constitute exceptional circumstances, which are evidenced and justified, to alter Green Belt boundaries in accordance with paragraph 136 of NPPF. For plan making, the application of the presumption in favour of sustainable development requires objectively assessed housing needs to be met.	https://wirral-consult.objective.co.uk/file/5683633	https://wirral-consult.objective.co.uk/file/5683637	https://wirral-consult.objective.co.uk/file/5683635	https://wirral-consult.objective.co.uk/file/5683638

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1249746	LPIO-26402 2 of 3				This is not prevented by the application of footnote 11 of the Framework in Wirral, since the independent and objective Green Belt Review obtained by the Council confirms that many sites only make a weak overall contribution to Green Belt purposes. Therefore the Green Belt in this case is not an asset of particular importance which should restrict the overall scale, type or distribution of development. This approach is consistent with the recent High Court judgement in Compton PC v Guildford BC [2019] EWHC 3242 (Admin), which validated the Local Plan Inspector's approach in that case. The judgement also supported the concept of headroom in housing provision, in order to ensure that Objectively Assessed Need would be met, as capable of contributing to the exceptional circumstances required to justify Green Belt release. The release of sustainable and suitable Green Belt sites in Wirral is required to meet the housing requirement in quantitative terms, in terms of actual numbers and the headroom required to ensure that they are achieved. The presumption in favour of sustainable development as articulated in NPPF paragraph 11 also requires that plans should be "sufficiently flexible to adapt to rapid change". An overdependence on brownfield sites within the urban area and a complete absence of urban extensions would significantly curtail the Local Plan's ability to adapt when delivery inevitably fails to meet the forecast trajectory. In this context, the advice from paragraph 72 of the Framework should be recalled: that the supply of large numbers of new homes can often be best achieved through planning for significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Turning to the qualitative justification for Green Belt release in Wirral, urban extensions which can deliver larger family homes will counterbalance the proliferation of smaller units coming forward on urban sites.				
1249746	LPIO-26402 3 of 3				Furthermore, the identification of additional Green Belt sites will result in significantly more affordable homes being delivered in Wirral given that this will allow the development of sites which are both larger and viable, so that a policy-compliant level of provision can be achieved. The Issues and Options Paper is deficient in that it also fails to address, in the event that the Green Belt boundary is reviewed, the requirement for safeguarded land. It is likely that some of the regeneration projects which have been identified by the Council will continue to provide housing completions within the next plan period. However, there is no evidence that these will be sufficient in numeric terms for the longer term and it remains the case that they will be inadequate to satisfy the ongoing need for family and affordable housing. Paragraph 136 of the Framework states "Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period" and paragraph 139 expects plans to "identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period". Should the Plan not adequately address this issue, it will not be consistent with national policy under paragraph 35 of the Framework and so will be unsound.				
1249219	LPIO-26473				Housing density should be maximised where appropriate in accordance with good planning practice.	https://wirral-consult.objective.co.uk/file/5677529	https://wirral-consult.objective.co.uk/file/5677528		
1249812	LPIO-26549 1 of 2				Whilst in principle, the approach is commendable, it is wholly unrealistic and severely flawed. This is evidenced by the results of the Strategic Housing Land Availability Assessment (April 2019) which demonstrate that currently there is not enough brownfield sites that meet the definitions of 'deliverable' or 'developable' as per the NPPF within the urban area to deliver the proposed housing requirement. Whilst the Council state they are currently in the process of exploring urban sites and increasing densities further, there is no guarantee or indeed evidence to suggest this is a credible or viable solution. As part of this process, the Council are becoming increasingly reliant on developer/promoter information and delivery rates rather than their own evidence base or consideration of historic delivery rates within the Borough. In addition to the further work being undertaken by the Council such as reviewing lapsed permission, contacting landowners, reviewing council owned land and so on, the Council are also seeking to allocate a number of active employment sites to deliver the housing requirement. As part of this process, the Council are proposing to allocate employment sites which as recently as 2017 were included in the Wirral Employment Land and Premises Study 2017 (EE2) which recommends sites be protected for new employment. This is a not a viable solution and highlights the conflicting nature of the Council's evidence base and approach to finding appropriate sites.	https://wirral-consult.objective.co.uk/file/5684813	https://wirral-consult.objective.co.uk/file/5684811	https://wirral-consult.objective.co.uk/file/5684812	
1249812	LPIO-26549 2 of 2				The Council themselves when justifying the approach acknowledge that utilising urban sites only brings with it a number of constraints and risks. The whole plan is at risk of being found unsound on the basis of limited evidence and overly optimistic assumptions in terms of delivery. Another major disadvantage of a brownfield first approach is the lack of certainty over whether sites are viable and therefore deliverable or not. At this stage, brownfield sites have been included with only a high level overview provided to justify the propose allocation. It is likely that a significant number of sites will have contamination issues and require remediating which will affect whether the site can viably be developed. Those sites that can progress will likely do at the detriment of planning obligations and affordable housing as developers look to offset the cost of remediation and delivery. As a result, the Council and more importantly local communities within the Wirral will be deprived of contributions to open space, schools, new leisure and health facilities and other important considerations secured by S106 agreements. In addition to overconcentration and social disadvantages, Option 1A will lead to a rise in cars and traffic in certain areas, some of which where local highway networks are already overloaded with limited capacity remaining as set out within the evidence base (T3).				
1246736	LPIO-26566	no			The whole focus of the change between 2018 and now has been on reducing the amount of Green Belt release. The housing land supply has been artificially inflated through the application of unrealistic density rates, and is reliant upon the establishment of new residential markets for major apartment developments. There is insufficient evidence to demonstrate that such an approach is suitable, viable and capable of meeting identified housing needs. The market could have brought these sites forward without a local plan so we see no logical reason why the adoption of this plan will have any material impact.				

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1240932	LPIO-26613	no			No, we strongly disagree with the Council's Preferred Approach and by pursuing it as it stands without supplementary Green Belt release, the Council will produce a Local Plan that will not be capable of being found sound at examination. The Urban Intensification Option focuses on delivering high density housing of which the vast majority will comprise 1 and 2-bed apartments based on the densities being envisaged by the Council on the sites included in the Plan. This will only meet a specific part of a market, which itself is not proven to exist and does not take into account the actual needs of Wirral's current and future residents. The Council's Preferred Approach as set out in the emerging Local Plan sets out a preference for 3 and 4-bedroom houses (60%) and just 22% flats. However, the Council's claimed supply is predominantly made up of sites and densities which will deliver mainly apartment type development. There is a severe conflict and mismatch in respect of the Council's approach. In the attached Technical Assessment, the suggested realistic range of housing need linked to the Council's growth aspirations is between 15,675 (1,045 dpa) and 19,500 (1,300 dpa) new homes. We have used two figures, one of 17,400 dwellings (1,160 dpa) at the middle of this range which might be appropriate based on past job growth trends and one at the upper end of this range which could be appropriate if the Council is serious about going for growth in light of the Enterprise Zone status of Wirral Waters and the wider growth aspirations of the Liverpool City Region. On the supply side, the analysis in the attached Technical Assessment provides a realistic view of delivery from the urban brownfield sites identified by the Council based upon site-specific assessments and site visits as well as incorporating viability assessments. When comparing these supply figures against the requirement numbers, we feel that the Council's Preferred Approach could result in a housing shortfall in the range of 12,000 to 14,000 homes across the Borough between 2020 and 2035.	https://wirral-consult.objective.co.uk/file/5683689	https://wirral-consult.objective.co.uk/file/5682697	https://wirral-consult.objective.co.uk/file/5682701	
1240932	LPIO-26614				Windfalls The Council has made a significant allowance for windfalls in their claimed supply over the plan period. In total, the Council anticipates that 3,600 units (240 units per year or 30% of the Council's housing requirement) will be delivered on unidentified windfall sites across the plan period. We do not disagree with the principle of including a small allowance in the Council's housing trajectory for windfall sites but consider that the Council's position of 30% of the housing requirement from this source is unjustified, unrealistic and an inappropriate method of meeting the Borough's identified needs. Windfall sites by their nature are generally small and as such deliver little if any affordable housing or infrastructure contributions as the site capacity falls below policy thresholds. Windfalls do not represent a guaranteed supply of housing sites and Wirral has been relying on this finite supply of sites for a considerable period of time in the absence of an up to date Local Plan and tightly defined Green Belt boundaries around, or washing over, settlements. Furthermore, the Council has little influence over the location of windfall sites and the size and type of property. As such, overly relying on windfall sites will result in the Council having little influence on the location or type of units coming forward and how that aligns with the Council's objectives set out in the plan.	https://wirral-consult.objective.co.uk/file/5683689	https://wirral-consult.objective.co.uk/file/5682697	https://wirral-consult.objective.co.uk/file/5682701	
1242697	LPIO-26643				The Council has failed adequately to respond to public concern about release of Green Belt in the Development Options Review (DOR), to which the public provided over 3,000 responses. The Council did not provide a sensible summary of the comments and reasons for public anger. The Issues and Options Document (IOD), simply implies that the public gave "a wide array of issues being raised by respondents (with a list)", "a number were supportive...but many expressed concern...", which does not properly convey the sense of opposition, in terms of the percentage opposed or the depth of feeling. My assessment of the comments shows overwhelming opposition, with about 96% of comments stating reasons for no Green Belt release; with many using the golden opportunity at Wirral Waters, Birkenhead and other east Wirral areas which need regeneration; and public anger against the Council for preparing the way for Green Belt release, and proposals for it. Senior officers gave earlier assurances that full feedback would be available in Spring 2019. This is lacking in transparency and contravenes the Government Guidelines for Consultations (section 1; "Explain the responses that have been received from consultees and how these have informed the policy"). It is only now, post - May 2019 local election results, that the options nudge towards a preferred option of no green belt release, yet, the IOD does not adequately keep Green Belt out of risk.	https://wirral-consult.objective.co.uk/file/5659118	https://wirral-consult.objective.co.uk/file/5659119	https://wirral-consult.objective.co.uk/file/5659120	https://wirral-consult.objective.co.uk/file/5659121
1242697	LPIO-26644				The Council has inadequately explored all avenues before considering Green Belt release. The EO for NDC Competition is good but is "behind the curve" as it should have been ready in 2018. Interested societies and community groups can identify pieces of brownfield which the issues and Options Document (IOD) has not listed or implied can be used for housing. The IOD does not convey the high priority of this avenue and its expectation that developers will utilise brownfield land rather than hoover up the easy Green Belt that the Council has offered in the IOD. The SHLAA style of vehicle and the Council's seeking of further land from landowners is proof of the intention to release Green Belt. The preferred option not to release Green Belt and focus on regeneration with higher densities is the right start but is not properly supported by the plans and means to avoid Green Belt release. The IOD looks like a nudge towards the public views but with a "safeguard" for the officers and Council that Green Belt can be released anyway without a failure of the Local Plan at inquiry. The IOD and technical papers give figures quoted by the Council and Peel Holdings that show sufficient capacity exists through regeneration, extant permissions, bringing empty homes into use, windfalls, and others.	https://wirral-consult.objective.co.uk/file/5659118	https://wirral-consult.objective.co.uk/file/5659119	https://wirral-consult.objective.co.uk/file/5659120	https://wirral-consult.objective.co.uk/file/5659121
1245180	LPIO-2714	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1245058	LPIO-2736	yes							
1237944	LPIO-2760	yes							
1238835	LPIO-2829	yes			I agree with urban intensification, especially the Wirral Waters project.				

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1237546 Wirral Wildlife	LPIO-2863	yes			Wirral Wildlife agrees with urban intensification, but with caveats: possible impacts on Mersey estuary, possible wildlife on brownfield sites, making adequate space for green infrastructure. Development must be limited to that really necessary, not what poorly-applicable national guidance says, and follow the mitigation hierarchy and Natural England guidance on protecting Habitat Sites. All recommendations of the HRA must be implemented (HRA Chapter 6).				
1242134	LPIO-297	yes							
1245159	LPIO-2997	yes							
1245287	LPIO-3114	yes							
1238645	LPIO-3123	yes							
1245320	LPIO-3229	yes							
1241315	LPIO-3281	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1245416	LPIO-3371	yes							
1245346	LPIO-3430	yes							
1245437	LPIO-3521	yes			Wirral waters has to be priority over green belt				
1238549	LPIO-358	yes							
1245451	LPIO-3580	yes							
1245462	LPIO-3626	yes							
1237827	LPIO-3792	yes							
1245288	LPIO-3852	no	it will mean higher density development which will impact on local character;						
1245498	LPIO-3964	no	it will mean higher density development which will impact on local character; it won't provide the type of homes people want to live in;		developers are only interested in building large detached high value family dwelling on the greenbelt areas in order to maximise their profit. Such homes will be unaffordable for the majority of Wirral residents				
1241491	LPIO-3979	yes			Yes. We support the Council's preferred approach of urban intensification. There is a significant amount and variety of brownfield land available in the Wirral to accommodate the development required over the plan-period. The Council must now make a clear and genuine effort to positively deliver development in the urban area and on brownfield sites.				
1245513	LPIO-4034	yes			Preferred approach must remove the potential for Green belt development				
1240939	LPIO-4137	yes							
1245638	LPIO-4259	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1239029	LPIO-4343	no	it will mean higher density development which will impact on local character; it won't provide the type of homes people want to live in; it won't provide homes where people want to live;		You are deliberately ruining an area just to provide justification for your unwanted 12000 new homes				
1245153	LPIO-4372	yes							
1245501	LPIO-4410	yes			I agree with Urban Intensification on Wirral Waters and throughout Birkenhead and Eastham				
1237667	LPIO-4563	yes							

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1244720	LPIO-4635	yes			Yes to building on brownfield sites provided they are not school sites, playing fields or recreation fields, cemeteries, allotments green spaces or wooded plantations or churches. All builds to incorporate environmentally sound regulations for energy consumption etc, and green urban areas.				
1237696	LPIO-4710	yes							
1237873	LPIO-4856				I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1245794	LPIO-4923	yes			As long as there is no loss of Green Belt, housing density should be maximised in line with best planning practice.				
1241327	LPIO-4969	yes							
1243171	LPIO-4974	yes							
1245867	LPIO-5024	yes			I SUPPORT THE COUNCIL'S APPROACH OF URBAN INTENSIFICATION AS THERE IS A LARGE AMOUNT OF BROWNFIELD LAND AVAILABLE ON WIRRAL. THIS COULD ACCOMMODATE THE DEVELOPMENT NEEDS OVER THE PLAN-PERIOD. I HOPE THE COUNCIL WILLMAKE A REAL ATTEMPT TO DELIVER DEVELOPMENT IN THE URBAN AREA AND ON BROWNFIELD SITES.				
1245713	LPIO-5069	yes			Agree with Urban intensification on Wirral waters.				
1237923	LPIO-5074	yes			i agree to the approach of meeting demands through urban intensification				
1244215	LPIO-5206	yes							
1239571	LPIO-5264	yes			Provided that the intensification is in the current major conurbations.				
1245908	LPIO-5295	no	it will mean higher density development which will impact on local character; it won't provide homes where people want to live;						
1240383	LPIO-5431	yes							
1246030	LPIO-5472	yes			Yes. I support the Council's preferred approach of urban intensification. There is a significant amount and variety of brownfield land available in the Wirral to accommodate the development required over the plan-period. The Council must now make a clear and genuine effort to positively deliver development in the urban area and on brownfield sites.				
1246035	LPIO-5480	yes			Yes. I support the Council's preferred approach of urban intensification. There is a significant amount and variety of brownfield land available in the Wirral to accommodate the development required over the plan-period. The Council must now make a clear and genuine effort to positively deliver development in the urban area and on brownfield sites.				
1245954	LPIO-5506	yes							
1246159	LPIO-5604	yes							
1245073	LPIO-5633	yes							
1241661	LPIO-5652	yes							
1245984	LPIO-5730	yes			Provided it doesn't encroach on urban green space and has the highest standards of sustainable development.				
1241868	LPIO-5782	yes			Agree with urban intensification on Wirral Waters. Need to make the view of Wirral waterfront far more attractive to potential tourists from across the Mersey.				
1244896	LPIO-5795	yes			'Urban Intensification' is supported by WGSA. But to be clear, WGSA only support Option 1B which employs a 'stepped approach' to Delivery to ensure the Council does not fail the stringent 85% target of the Housing Delivery Test introduced when the NPPF was revised in July 2019. Otherwise the Local Plan will be quickly rendered out-of-date, with all the harmful consequence that would follow. Please refer to NPPF Annex 1 Implementation. Additionally, support is conditional upon no significant 'loss of character' where this is distinctive, locally recognised and valued, and worth retention. This would not preclude, for instance, smaller units being combined in a satisfactory way so as to resemble existing, larger buildings, provided they do not appear as inferior 'pastiche'. 'Tandem' and 'Garden' developments may be supported where these truly fit in with the surrounding character and are not just permitted development, to official standards and allowable separation distances. The development of existing local 'green' areas is NOT supported and should not be a part of 'Urban Intensification'. On the contrary, new green spaces, play areas, vistas, landscape relief, walking and cycling routes and more are vital for good Design, healthy living, well-being and the avoidance of monotonous estate development. Landscaping should include trees in the public domain and on private boundaries (having due regard to shading).				
1246295	LPIO-5836	no	Other (please state);		I agree wholeheartedly with redevelopment of brownfield sites but not with the potential loss of greenbelt				
1245767	LPIO-5901	yes			Yes, within existing urban areas, and provided that it is respectful of its surroundings and existing neighbouring development.				

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1239471	LPIO-5913	yes			Strategically we support the Council's Preferred Option of Urban Intensification. We consider that Green belt development should only be pursued as a last resort in the event that urban sites cannot meet the necessary development targets.				
1246310	LPIO-5940	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1246342	LPIO-6016	yes			The use of Green Belt land is unacceptable, what exactly does "weakly performing" mean?				
1246306	LPIO-6076	yes							
1242751	LPIO-613				I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1246339	LPIO-6162	yes							
1238310	LPIO-6167	no	Other (please state):		I do not agree with urban intensification option 1a. WBC is not fully applying the urban intensification approach to the plan. It currently relies on greenbelt release to make it viable. If a plan includes greenbelt for 20% of its housing then by definition it is not an urban intensification approach. Urban intensification should be used for the whole plan WBC has identified 14841 urban intensification sites in table 4.2 (2000 surplus) Using the typologies included in the 2018 Viability report 2018 all Wirral's housing need can be proved developable using brownfield only urban intensification. There are sufficient brownfield sites to select from. WBC has published commissioned reports showing that there is not a demand for 12000 new homes in Wirral. Wirral Statistics compendium project a population increase of only 4700 by 2035. This is very optimistic considering it records a growth of 100 people in the last 20 years. The standard method of measurement should be challenged WBC has published no evidence that greenbelt sites are developable or deliverable. WBC has not published its case of exceptional circumstance for release of greenbelt but includes greenbelt in its preferred option. WBC has shown the exceptional circumstance cannot be a shortage of urban brownfield land. 15500 urban brownfield sites are identified in the document.				
1246161	LPIO-6236	yes			Development of urban areas appears to be the optimal option.				
1246352	LPIO-6288				Develop land along the River Mersey - Wirral Waters, Rose Brae, Hind Street.				
1246393	LPIO-6347	yes		In so far as Greenbelt is protected as far as possible.					
1242183	LPIO-6387	no							
1246415	LPIO-6436	yes							
1246402	LPIO-6441	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. Lets have a fantastic skyline side of the river.				
1246419	LPIO-6497	no							
1246421	LPIO-6522	no							
1246425	LPIO-6544	no			Consistent with national policy, we support policies for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land (117, Framework). However, this should take into account local market conditions and viability (122, Framework). The Economic Viability Baseline Update and evidence provided by the Consortium demonstrates that many of the larger sites in the urban area have confirmed viability related issues and are unlikely to come forward without significant public funding. Consequently, we think that the Council should prepare the plan positively by taking into account the desirability of promoting regeneration and change in Birkenhead but, consistent with national policy, plans should be prepared positively in a way that is aspirational but deliverable (16, Framework). Accordingly, regeneration and development of Birkenhead should not accommodate a significant proportion of the borough's until it is a deliverable option. Eastham contains sites (including SP050 West of Rivacre Road (parcel 4.14)) that are demonstrated to be deliverable, meaning that the plan can be prepared positively and satisfy the tests of soundness.	https://wirral-consult.objective.co.uk/file/5669567			
1241723	LPIO-6565	yes							
1245086	LPIO-6615	yes			Urban intensification is definitely necessary to prevent destruction of the countryside. It should be centred around Wirral Waters and the eastern coast in this area.				
1246435	LPIO-6630	no	Other (please state):		I agree with Urban Intensification on Wirral waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the river Mersey. I do agree with Urban Intensification on any greenbelt land.				
1245286	LPIO-6647	no	Other (please state):		I agree with Urban Intensification on Wirral waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the river Mersey. I do agree with Urban Intensification on any greenbelt land.				
1246438	LPIO-6665	no	Other (please state):		I agree with Urban Intensification on Wirral waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the river Mersey. I do agree with Urban Intensification on any greenbelt land.				
1241910	LPIO-6682		Other (please state):		I agree with urban intensification on Wirral Waters and the land known as "Rose Brae". We need an attractive skyline on the Wirral Banks of the Mersey.				

Person ID	ID	Question 4.18 - Do you agree with our preferred approach to meeting demands in Wirral through Urban Intensification?	Question 4.18a - If No, please explain why you don't agree with this approach (please select):	Question 4.18b - If you answered Other, give a brief description here:	Question 4.18c - Please provide further details if you don't agree. If you agree you can also comment here.	Attachment 1	Attachment 2	Attachment 3	Attachment 4
1243420	LPIO-6699	yes							
1246441	LPIO-6722	no	Other (please state);		I agree with Urban Intensification on Wirral waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the river Mersey. I do agree with Urban Intensification on any greenbelt land.				
1246445	LPIO-6749	yes							
1246447	LPIO-6770				I agree with the Urban intensification on Wirral waters and the land known as Rose Brae. This would improve the area.				
1246452	LPIO-6788				I agree with the Urban intensification on Wirral waters and Rose Brae.				
1246455	LPIO-6803	yes							
1237647	LPIO-681	yes							
1246348	LPIO-6882	no	it will mean higher density development which will impact on local character; it won't provide the type of homes people want to live in;		Intensification of buildings can be attractive and work but it's something this country doesn't seem able to achieve. The obvious place is Wirral Waters.				
1246482	LPIO-7035	yes							
1246456	LPIO-7070	yes							
1246486	LPIO-7098	yes			I agree with Urban Intensification on Wirral and the land known as "Rose Brae" The Wirral needs an attractive skyline on the Banks of the river Mersey. Why has nothing at all happened on our side of the River Mersey. Why is Wirral left behind once again. We should be now like Liverpool skyline. But all we have is an empty shell.				
1246501	LPIO-7167	yes							
1246504	LPIO-7190	yes			I agree with the regeneration of Birkenhead, Wirral Waters and Hind Street.				
1246488	LPIO-7195	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1244604	LPIO-7220	yes							
1246515	LPIO-7248	yes							
1246518	LPIO-7272	yes							
1246524	LPIO-7329	yes			As industry changes, new sites in town and near docks become available, but one has to make such developments attractive to people so the want to live there with good quality schools, health care and transport links.				
1246545	LPIO-7404	yes			This would improve town centres, give people better housing and environment while living close to employment, meaning less travelling, therefore fewer cars, less pollution and also giving the leisure and retail industries a much needed boost.				
1237978	LPIO-7422	yes							
1246550	LPIO-7502	yes			I agree with development by Wirral Waters and the land known as "Rose Brae". The Council should mirror the success on the Liverpool side of the Mersey and create an attractive area for people to enjoy living - with affordable housing.				
1240653	LPIO-7555	yes							
1241770	LPIO-7557	yes							

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1240932	LPIO-7614	no	it will mean higher density development which will impact on local character; it won't provide the type of homes people want to live in; it won't provide homes where people want to live; Other (please state);	Please refer to our accompanying representations.	No, Our Client strongly disagrees with the Council's Preferred Approach. Whilst our representations do not suggest that the ambition to promote appropriate urban regeneration should be abandoned, without supplementary Green Belt release the Preferred Approach will result in an unsound Local Plan. It will bring about a severe shortfall in delivery of new homes and those homes it does encourage will be located in too small an area for the market to sustain and will be of an inappropriate mix and tenure. In particular, please refer to our responses to questions 4.10, 4.11 and 10 for further detail on our views of the Options presented by the Council and the draft Sustainability Appraisal. In paragraphs 5.44 to 5.48 of our representations we illustrate how Green Belt release is inevitable, in order to meet the Borough's housing needs. This shows the Preferred Approach could result in a housing shortfall in the range of 12,000 to 14,000 homes across the Borough between 2020 and 2035. Our Client supports the identification of the land under our control for potential release through the Council's Options 2a and 2b and we are committed to working proactively with the Council towards its future delivery, should it be allocated in the Local Plan. However, a very considerable shortfall is still likely to result over the plan period even if this land is allocated. Therefore, we have identified a number of additional parcels across our landholding, all which contribute weakly to the Green Belt. These sites could accommodate around a further 5,000 dwellings which would make a vital contribution to the likely shortfall in market and affordable homes. Furthermore, our Vision Document outlines the opportunity to also create new communities, compensatory biodiversity enhancements and new countryside access networks. Further detail can be found at paragraphs 5.42 to 5.50 of our representations.	https://wirral-consult.objective.co.uk/file/5683689	https://wirral-consult.objective.co.uk/file/5682697	https://wirral-consult.objective.co.uk/file/5682701	
1246581	LPIO-7648	no		Housing density should be maximised where appropriate in accordance with good planning practice					
1246592	LPIO-7746	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1243342	LPIO-778	yes							
1246594	LPIO-7817	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1246431	LPIO-7824	yes							
1246591	LPIO-7907	yes							
1240903	LPIO-7918	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1246596	LPIO-8057	yes							
1246605	LPIO-8153	yes			I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.				
1246612	LPIO-8336	yes			This is the best option by far. A long term vision to develop the area around the banks of the Mersey around Birkenhead. A great opportunity to change the region forever				
1237882	LPIO-8378	yes	Other (please state);	As long as the greenbelt is not included. I agree with Urban Intensification on Wirral Waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the River Mersey.	Yes I support the Council's preferred approach of urban intensification. There is a significant amount and variety of brownfield land available in the Wirral to accommodate the development required over the plan-period. The Council must now make a clear and genuine effort to positively deliver development in the urban area and on brownfield sites. However, I do not agree with the inclusion in any of the greenbelt.				
1245434	LPIO-8447	yes							
1243448	LPIO-876	yes			Green belt/field sites should never be developed.				
1246544	LPIO-8829	yes							
1246631	LPIO-8837	yes							
1245034	LPIO-8842	yes							
1246286	LPIO-8913	yes			I agree with the preferred approach (urban intensification) but I feel that the council should stick to this approach and should not be proposing releasing green belt parcels.				

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1246666	LPIO-9008	no			I agree with Urban Intensification on Wirral waters and on the land known as 'Rose Brae'. We need an attractive skyline on the Wirral banks of the river Mersey. I do agree with Urban Intensification on any greenbelt land.				
1246651	LPIO-9027	yes							
1246670	LPIO-9067	yes							
1240872	LPIO-9088	yes			Only in areas of Birkenhead and Wirral Waters				
1246671	LPIO-9106	yes							
1239377	LPIO-9111	yes			I believe urban intensification is the way forward, as long as it is delivered via a stepped approach in order to keep the Local Plan relevant for the time period it covers. Wirral Waters is a great start.				
1246672	LPIO-9150	yes							
1237807	LPIO-9231	yes							
1246678	LPIO-9339	no	it will mean higher density development which will impact on local character; it won't provide the type of homes people want to live in; it won't provide homes where people want to live;		The homes created will not be affordable, the area does not have the infrastructure required to meet the needs of the population who require affordable homes.				
1246624	LPIO-9347	yes							
1241495	LPIO-9435	yes			Yes, I support the principle of urban intensification ie redeveloping brownfield sites first and concentrating development in the existing urban areas. This is the most sustainable approach and also least damaging to wildlife. However where there is wildlife on Brownfield sites then it would need protection from development. The coast too would need to be given adequate protection. Provision would have to be made for adequate green space with the urban area. Development should be limited to what is actually required not the unrealistic targets that have been set.				
1245833	LPIO-9579	yes			NT supports preferred approach to meeting demands through urban intensification - reduce need to release sites outside settlement boundaries & preserves characteristic openness of Green Belt.	https://wirral-consult.objective.co.uk/file/5656422			
1246712	LPIO-9597	no	it won't provide the type of homes people want to live in; it won't provide homes where people want to live;	Please see the attached statement for our full case.	Please see the attached statement for our full case.				
1246717	LPIO-9669	no	Other (please state);	Dispersed Green Belt release will be necessary	It is considered that some dispersed release of Green Belt sites will be necessary for the reasons set out earlier in this response, ensuring there is sufficient flexibility within the Plan to enable housing needs to be met over the Plan period. Additionally, it is considered that the Urban Intensification Strategy may be unable to deliver the required number of affordable units. The delivery of policy compliant schemes is harder when developing on constrained sites, which may require significant land remediation due to ground contamination; have multiple owners and planning obligation agreements; and may rely on grants to be delivered. Less technically constrained sites, such as those which were previously part of the Green Belt, are generally more likely to be home to a policy compliant provision of affordable housing, subject to viability. Additional potential urban sites have been identified as supporting the urban residential allocations within Option 1A. If the potential additional urban housing allocations identified cannot be added to the existing urban land supply, additional sites will have to be made available to support the residual housing land requirements. Moreover, should the density requirements not be reached, additional sites will be required to be released. Additional Green Belt release under Option 2A, Dispersed Green Belt Release, would support the Urban Intensification strategy in any event given such a high risk strategy is being progressed. Option 2A would allow land to be released from the Green Belt where it makes a weak contribution, and can be demonstrated to be deliverable under the Framework definition. Our Client's land interest, Land at Mount Road, is demonstrated to make a weak contribution to the Green Belt at the Supporting Statement to Question 2.16, and as such it should be included within this strategy through allocation for residential development.				
1238424	LPIO-9809	no	it will mean higher density development which will impact on local character;						

