

Appendix 1

Wirral Council responses to non site-specific issues raised in Development Options Review consultation

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Green Belt Release

Objection in principle to the release of land from the Green Belt

Total comments	Comment IDs	Summary of issue raised in comments	Wirral Council response to issue
1906	<i>Not listed due to volume of comments</i>	Green Belt is given the highest level of protection in national policy, with statements from national government reaffirming that it should not be released to meet housing needs alone. Regardless of any other development pressures, Wirral's Green Belt is too sacred to be lost to development and development in the Green Belt will fundamentally alter the character of the Wirral.	No decision has yet been taken to release land from the Green Belt. The Council's preferred option is to use only urban sites to meet the Borough's future housing and employment needs. The Council is doing everything it can to avoid releasing any land from the Green Belt, as set out in the Local Plan Issues and Options document 2020.
		The exceptional circumstances necessary for the release of land from the Green Belt do not exist – there is not a demonstrated need for that quantum of new homes – and insufficient work has been done to explore other options to meet housing need. Further evidence should be gathered to look into alternatives before using the Green Belt for development, such as an updated SHLAA that includes sites where development has already begun, re-estimated housing figures based on realistic population growth and a more thorough review of available Brownfield sites.	The quantum of new homes set out in the Local Plan Issues and Options document is based on the standard method in national planning guidance, in line with paragraph 60 of the National Planning Policy Framework ¹ . A decision on exceptional circumstances will only be taken in line with paragraph 137 of the National Planning Policy Framework, based on the findings of the Issues and Options consultation. The Local Plan Issues and Options documents sets out the other options that have been explored, to avoid the need to release land from the Green Belt. This has included an updated SHLAA, a re-consideration of brownfield and other urban sites and future housing densities, work to establish the number of empty homes that could be brought back into use and the potential for future regeneration initiatives.
		Proposals for infill development within villages currently washed over by the Green Belt appears to be a means to avoid further consultation on development.	Paragraph 145 of the National Planning Policy Framework permits limited infilling within villages washed over by the Green Belt. Planning applications for infill development are subject to public consultation in the normal way.
		Allowing Green Belt development now will open the floodgates to further Green Belt development in future.	Green Belt boundaries can only be altered where exceptional circumstances are fully evidence and justified, in line with paragraphs 136 and 137 of the National Planning Policy Framework. These safeguards will apply to any future boundary change.

¹ The National Planning Policy Framework and its associated practice guidance can be viewed at <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

The methodology for Green Belt assessment is flawed

Total comments	Comment IDs	Summary of issue raised in comments	Wirral Council response to issue
10	147, 187, 631, 191, 744, 783, 897, 1100, 1699, 3215	<p>The Green Belt methodology focuses only on constraints rather than any opportunities that may exist. The methodology explains (paragraph 2.9 and 2.10) that Green Belt sites that have been submitted to the Council for consideration will not be considered before a Green Belt review, but then states that the review will seek to identify any potential constraints that could prevent development for other reasons. This contradictory approach seems to only restrict any potential development</p> <p>There is no justification for the exclusion of strong boundary features such as hedgerows, treelines, walls, fences, watercourses and footpaths. The M53 is not a recognisable boundary in the same way that the current Green Belt boundaries are.</p> <p>The Council has chosen to define arbitrary 'Settlement Areas' – this means that areas where development would have previously resulted in the merging of settlements are now being classed as in-fill within the larger settlement area. This will result in the potential release of land from the Green Belt that should not be developed.</p> <p>The public cannot be sure that the methodology has provided the most reliable outcome, given the lack of info on who proposed it – i.e. the council vs. outsourced consultants.</p> <p>The Council has deliberately put forward large parcels of Green Belt, knowing they can't be developed, in order to make smaller sites appear more acceptable.</p> <p>Members of the public were not made aware of the separate green belt methodology consultation.</p>	<p>A more detailed Green Belt Review 2019 has now been undertaken by specialist consultants, which responds to the critiques of the previous methodologies used, can be viewed on the Council's website at https://www.wirral.gov.uk/planning-and-building/local-plans-and-planning-policy/local-planning-evidence-and-research-reports-3</p> <p>The Green Belt Review 2019 considers the varying levels of durability of different types of Green Belt boundary features. The M53 motorway is considered to form a strong, defensible boundary feature, as a significant fixed, physical barrier.</p> <p>The Green Belt Review 2019 sets out the methodology that has now been used, in line with national policy and best practice. The Settlement Areas used in the previous methodology were identified following public consultation in January 2010, November 2010 and January 2012 and were adopted by the Council in October 2012.</p> <p>The Green Belt Review 2019 has been prepared by recognised specialist consultants to comply with national policy and best practice, which is fully set out within their report.</p> <p>The parcels previously identified were based on boundaries that would have complied with national policy by using physical features that are readily recognisable and likely to be permanent</p> <p>The previous methodology has now been replaced by the Green Belt Review 2019, which has been published for public comment alongside the Local Plan Issues and Options document. Consultation on the previous methodology was published and advertised during 2017 in line with the Council's Statement of Community Involvement in the normal way.</p>

Support for the necessity of the release of land from the Green Belt

Total comments	Comment IDs	Summary of issue raised in comments	Wirral Council response to issue
31	12, 36, 40, 206, 207, 208, 261, 329, 333, 353, 408, 504, 531, 591, 595, 1503, 1915,	Support for infilling Green Belt sites on the periphery of existing towns.	Support has been noted but a revised approach is currently proposed in line with paragraph 145 of the National Planning Policy Framework and the findings of the Green Belt Review 2019.
	1989, 2267, 2354, 2466, 2544, 2550, 2701, 2808, 2863,	There is a clear need for new housing in Wirral – given the finite supply of available brownfield land, Green Belt release is the only way to accommodate housing need.	Support has been noted but the Council is continuing to do all it can to avoid releasing any land from the Green Belt.
	2966, 3061, 3104, 3105, 3142	If housing is built on the Green Belt it should only be Council owned.	This is unlikely to be deliverable, as while the Council would have a role in ensuring the provision of new affordable homes on any sites to be developed, the Council does not own most of the potential sites for allocation and will require the market to build the majority of new homes.

Settlement Strategy

Brownfield or derelict land should be utilised for development first

Total comments	Comment IDs	Summary of issue raised in comments	Wirral Council response to issue
1314	<i>Not listed due to volume of comments</i>	<p>Brownfield land should be prioritised first to force developers to bring it back into use, rather than diverting investment to the more attractive Green Belt sites. National planning policy requires a 'brownfield first' approach to development. This has not been followed in this case. Development should be focused in the urban area of Wirral first (north and east Wirral, Birkenhead, New Ferry, Rock Ferry etc.) to ensure that residents in more rural areas retain access to green space and that the existing character of the Wirral is protected. Areas with brownfield or derelict land around the eastern side of the Wirral (such as Birkenhead, New Brighton, Wallasey, Liscard, Tranmere, New Ferry, Rock Ferry) should be priorities for development and require investment to address regeneration issues.</p> <p>The future of the high street is in question, more sites could become available in future within the town centres. This should be considered in future housing land availability studies.</p> <p>The Council should use its compulsory purchase powers to bring brownfield sites that are difficult or unviable to deliver into public control, meaning that no development is required in the Green Belt.</p>	<p>The Council has been doing all it can to ensure that the Borough's future needs can wherever possible be accommodated on brownfield sites. The Local Plan Issues and Options document sets out the work that has been undertaken to avoid the need to release land from the Green Belt. This has included an updated SHLAA, a re-consideration of brownfield and other urban sites and future housing densities, work to establish the number of empty homes that could be brought back into use and the potential for future regeneration initiatives. Relevant sites have been included in the Local Plan Issues and Options document, where they are known to be available, suitable and achievable.</p> <p>Relevant sites have been identified in the SHLAA 2019, where they are known to be available, suitable and achievable. The Wirral Retail and Centres Study 2019 can now be viewed on the Council's website at https://www.wirral.gov.uk/planning-and-building/local-plans-and-planning-policy/local-planning-evidence-and-research-reports-3 The Local Plan Issues and Options document looks at opportunities in Birkenhead Town Centre through the forthcoming Birkenhead Regeneration Framework, with an estimated capacity for over 1,000 new dwellings alongside a new civic hub, relocated market, public space, leisure centre and offices and proposals for regeneration in New Ferry.</p> <p>The Council can consider using its compulsory purchase powers where appropriate, however use of these powers is subject to a strict statutory regime and forms part of a complex legal process with requirements for compensation to be paid to landowners. Any compulsory purchase would need to be supported by an adopted planning strategy, which is now set out for public comment in the Local Plan Issues and Options document, and would have to meet the strict legal tests relating to the use of compulsory purchase powers.</p>

Total comments	Comment IDs	Summary of issue raised in comments	Wirral Council response to issue
		Parts of Wirral have concentrations of very large existing dwellings – consideration should be given to sub-dividing these to create a number of smaller dwellings, reducing the number of new homes needing to be built.	The Council has existing policies for the conversion of existing property and an existing funded programme to support bringing empty property back into use. A Wirral Empty Homes Study 2019 has been published as part of the consultation on the Local Plan Issues and Options document.

More effort should be put into the delivery of Wirral Waters, rather than other sites

Total comments	Comment IDs	Summary of issue raised in comments	Wirral Council response to issue
		Wirral Council has been too weak on Peel Holdings, who are now taking advantage of the Council's need to build many homes in the coming plan period. Peel has permission to build 13,000 new homes – they should be compelled to deliver this number, and not be allowed to revise their numbers downwards. If Peel continue to fail to deliver Wirral Waters, the Council should use its compulsory purchase powers to acquire the site, then sell the land to another developer or develop the land itself.	The Council has worked with Peel and other funding and infrastructure partners to support delivery at Wirral Waters as quickly as possible. The Local Plan Issues and Options document sets out the current position, taking account of the most recent proposals and planning applications and the future aspirations of the landowner, which could support the delivery of up to 4,500 new dwellings within the fifteen-year Plan period, providing they can be shown to be 'deliverable' or 'developable'. The Council can consider using its compulsory purchase powers, but the site is already being actively prepared for development to begin.
		Affordable housing should be fulfilled by sites like Wirral Waters, and not elsewhere.	The proposed approach to the delivery of affordable housing is set out in the Local Plan Issues and Options document. The preferred approach seeks to develop a mix of different types and size of housing in all locations across the Borough, with up to 30% affordable housing on all sites larger than 10 dwellings. It would not be appropriate or sustainable for all the Borough's affordable housing needs to be met on just a small number of sites or in a single concentrated location.
		A decision by the Court of Appeal in 2017 clarified that the deliverability of development on a site only needed to be 'reasonably possible' – not certain, or even probable – in order to count towards a housing supply. The full capacity of Wirral Waters has therefore been wrongly excluded.	Wirral Waters is a very large scheme, which is expected to deliver new homes both within and beyond the current fifteen-year period for the Local Plan. The 2019 National Planning Policy Framework and its associated practice guidance has introduced much more specific and stringent requirements about what a local authority can class as a 'deliverable' or 'developable' site (Glossary page 66 refers). The Local Plan Issues and Options document sets out the number of dwellings expected to be delivered within the existing Plan period.

The development of a whole new settlement should be considered, rather than smaller development sites

Total comments	Comment IDs	Summary of issue raised in comments	Wirral Council response to issue
11	321, 341, 412, 507, 558, 1010, 2255, 2266, 2712, 3061, 3109	It costs less to build in bulk on one large site than small parcels spread across Wirral – it would enable a fresh start with sustainable housing, infrastructure and connections instead of increasing pressure on existing services	The Local Plan Issues and Options document sets out the options that are currently available, including a summary of their advantages and disadvantages, which includes large scale development in and around Birkenhead and the option of a single urban extension in the Green Belt, if sufficient 'deliverable' or 'developable' urban sites cannot be identified.

There are large numbers of empty homes around the Wirral not being utilised

Total comments	Comment IDs	Summary of issue raised in comments	Wirral Council response to issue
231	<i>Not listed due to volume of comments</i>	The Wirral's current housing stock should be upgraded.	Information on the condition of the existing dwelling stock and the need for different types and sizes of dwelling is set out in the Draft Strategic Housing Market Assessment 2020. Proposals to support improvements to the existing dwelling stock are set out within the Council's corporate Housing Strategy. While policies to support these improvements will, where relevant, be included within the emerging Local Plan, the Local Plan must concentrate on meeting the need for additional new homes.
		There are thousands of empty properties in Wirral, these should be redeveloped before introducing new development.	A Wirral Empty Homes Study 2019 has now been published and a proposed contribution from empty homes has been included in the housing calculations in the Local Plan Issues and Options document.
		There are several thousand homes up for sale across Wirral (specific mention in comments to West Wirral), these must be considered in housing delivery targets.	Homes for sale form part of the normal 'churn' of a housing market. The Draft Wirral Strategic Housing Market Assessment 2020 has not identified any unusual level of vacancy linked to house sales. Overall vacancy is currently at 3.3%, just above the 'transactional vacancy level' of 3%, which is the proportion of stock normally expected to be vacant to allow movement within the market. A proposed contribution from empty homes has been included in the housing calculations in the Local Plan Issues and Options document.
		There is a large elderly population in Wirral that is only set to increase over the plan period, the Council should consider measures to encourage downsizing, to free up larger homes for families in need.	The Council has a funded programme to support the delivery of additional housing suitable for older people. The Draft Wirral Strategic Housing Market Assessment 2020 seeks to further quantify these requirements to enable the Local Plan to secure a range of types of new home to meet the needs of older residents looking to move and/or downsize.

Total comments	Comment IDs	Summary of issue raised in comments	Wirral Council response to issue
		The wrong sort of homes are being built – there are vacant newly-built executive homes because they are out of reach for first time buyers and retirees looking to downsize.	The Draft Wirral Strategic Housing Market Assessment 2020 sets out the different type, size and tenure of dwellings that are likely to be required over the Plan period. The preferred approach set out within the Local Plan Issues and Options document, is to reflect the mix of different type, size and tenure that are needed within new developments.

Agricultural land should be protected from development

Total comments	Comment IDs	Summary of issue raised in comments	Wirral Council response to issue
151	6, 20, 42, 48, 49, 52, 63, 81, 85, 87, 141, 143, 169, 170, 174, 177, 178, 185, 186, 188, 190, 194, 197, 198, 199, 204, 210, 216, 230, 245, 253, 259, 260, 265, 266, 267, 268, 273, 283, 284, 286, 289, 302, 320, 332, 335, 337, 340, 341, 352, 359, 372, 390, 400, 403, 408, 438, 445, 449, 453, 455, 465, 466, 467, 478, 482, 485, 488, 493, 495, 525, 532, 550, 553, 567, 569, 572, 575, 595, 886, 1509, 1517, 1698, 1832, 2039, 2045, 2059, 2195, 2253, 2301, 2324, 2334, 2355, 2401, 2415, 2423, 2445, 2503, 2506, 2508, 2515, 2519, 2528, 2532, 2605, 2624, 2628, 2645, 2653, 2673, 2674, 2677, 2680, 2684, 2704, 2707, 2708, 2733, 2758, 2765, 2774,	<p>Farming has been an important part of the historic development of the Wirral, and is a key part of its character. It should therefore be preserved.</p> <p>External factors such as Brexit and the climate emergency are impacting the ability and desirability of importing food into the UK – agricultural land needs to be preserved as much as possible to allow local food production.</p> <p>Developing on agricultural land will negatively affect the livelihood of farmers – even if farms are only partly developed, the smaller resulting farm will be less viable in the future.</p> <p>The site selection process undertaken has not had sufficient regard to the need to protect the best and most versatile agricultural land – many of the proposed development sites are the best performing.</p>	<p>The Council has been doing all it can to ensure that the Borough's future needs can wherever possible be accommodated within the existing urban area. A Wirral Agricultural Economy and Land Study 2019, a Wirral Landscape Character Assessment 2019 and Landscape Sensitivity Assessment 2019 can now be viewed on the Council's website at https://www.wirral.gov.uk/planning-and-building/local-plans-and-planning-policy/local-planning-evidence-and-research-reports-3</p>

Total comments	Comment IDs	Summary of issue raised in comments	Wirral Council response to issue
	2776, 2799, 2805, 2812, 2813, 2821, 2858, 2868, 2872, 2879, 2895, 2918, 2927, 2960, 3001, 3011, 3029, 3035, 3039, 3043, 3062, 3066, 3068, 3104, 3105, 3135, 3136, 3140		

Development Quantums

Housing growth is over-estimated, and the new housing target is too high

Total comments	Comment IDs	Summary of issue raised in comments	Wirral Council response to issue
458	<i>Not listed due to volume of comments</i>	Wirral requires a more bespoke housing target methodology given the demographics and population growth history. National statistics should not be applied to Wirral. Wirral Council needs to stand up for itself, and not accept housing targets pushed onto it by national Government.	National policy has moved away from the preparation of bespoke assessments. Paragraph 60 of the National Planning Policy Framework now requires strategic policies to be informed by a local housing need assessment, conducted using the standard method in national planning guidance unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. The Local Plan Issues and Options document asks for evidence of exceptional circumstances and potential alternative approaches to be submitted for consideration as part of the consultation.
		Windfall sites should be considered when establishing the number of sites needing to be developed – this will bring the numbers down.	An allowance for new-build windfalls, net gains from conversions and changes of use and a proposed contribution from empty homes has been included in the housing calculations in the Local Plan Issues and Options document.
		The housing projections do not have any regard to significantly reduced levels of immigration that will be likely after Brexit and are therefore over-inflated.	The potential implications of Brexit on Wirral are still unknown and cannot therefore yet be included in any local calculations. The population and household projections produced by the Office for National Statistics (ONS) already assume that net migration to the UK will be lower in the future than current levels.
		ONS figures suggest the largest population growth will be in the over-65 age group. Specific housing is required for this demographic e.g. care homes, which would also create more empty homes for other residents in Wirral to occupy, particularly young families.	The specific housing requirements of different social groups are now set out in a Draft Wirral Strategic Market Assessment 2020, which can now be viewed on the Council's website at https://www.wirral.gov.uk/planning-and-building/local-plans-and-planning-policy/local-planning-evidence-and-research-reports-3
		Wirral's population growth has been stagnant in recent years and is only expected to grow by 1.7% over the next 20 years according to WBC's own Compendium of Statistics 2018. People do not tend to move to or from Wirral – around 85% house moves in Wirral are within Wirral. This means that there is limited need for new homes.	The minimum number of homes needed, calculated using the standard method in national planning guidance takes account of household (rather than population) growth and local affordability and already take account of cross-boundary migration.
		Low levels of housing completions in recent years demonstrate the lack of market interest in Wirral – there is no reason to think market interest will suddenly increase.	Housing completions are subject to statutory annual monitoring, which and can be viewed on the Council's website at https://www.wirral.gov.uk/planning-and-building/local-plans-and-planning-policy/development-monitoring . 806 completions were registered in Wirral during 2017/18 and 798 during 2018/19 (gross).

Total comments	Comment IDs	Summary of issue raised in comments	Wirral Council response to issue
		There are few major employment locations in Wirral, with no plans to create more, and economic forecasts suggest limited or negative growth after Brexit. There therefore aren't enough employment opportunities to justify additional housing.	The minimum number of homes needed, calculated using the standard method in national planning guidance only takes account of household growth and local affordability. The latest employment forecasts for Wirral are included in the Liverpool City Region Strategic Housing and Employment Land Market Assessment (SHELMA) 2018. As the minimum number of homes needed, calculated using the standard method is higher than the numbers calculated in the SHELMA, the Council has concluded that there is unlikely to be any need to further increase the Local Plan housing requirement to accommodate economic growth.
		Wirral should consider Cheshire West and other surrounding boroughs' housing provisions, which can contribute to Wirral's housing requirements.	The Council has a duty to co-operate with adjoining councils when preparing a local plan. This duty has been undertaken as each stage has been reached. Adjoining councils have previously indicated that they would not be able to meet any of Wirral's needs, as well as their own needs, within the immediate housing market area. The latest position will be re-confirmed in writing as part of the consultation on the Local Plan Issues and Options document. A Duty to Co-operate Interim Summary Statement can be viewed on the Council's website at https://www.wirral.gov.uk/planning-and-building/local-plans-and-planning-policy/local-planning-evidence-and-research-reports-3

Concerns around existing housing provision

Total comments	Comment IDs	Summary of issue raised in comments	Wirral Council response to issue
5	187, 250, 1038, 1148, 3214	The Council is failing to deliver against its existing housing target and cannot demonstrate the required five-year housing land supply – further housing supply is required.	The Local Plan Issues and Options document sets out the options that are currently available to secure a 'deliverable' and 'developable' housing land supply throughout the fifteen-year Plan period.

Provision of the right type of new homes

Certain areas of Wirral should not have to provide affordable housing

Total comments	Comment IDs	Summary of issue raised in comments	Wirral Council response to issue
70	8, 73, 84, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 161, 162, 163, 164, 165, 191, 200, 301, 321, 397, 529, 2452, 2467, 2591, 2640	<p>Areas on the western side of the Wirral should not have to provide significant social housing in new development – they have evolved as affluent communities, and this forms an important part of their character.</p> <p>The kind of homes that are ‘affordable’ would blight the landscape, particularly in West Wirral, as they would be of low quality and high density.</p> <p>There is nothing to prevent affordable homes in affluent areas from being re-sold at the market rate of that area, rendering the provision of affordable housing pointless.</p>	<p>The Draft Wirral Strategic Housing Market Assessment 2020 identifies the areas of greatest need of affordable housing within the Borough. The proposed approach to the delivery of affordable housing is set out in the Local Plan Issues and Options document. The preferred approach seeks to develop a mix of different types and size of housing in all locations across the Borough, with up to 30% affordable housing on all sites larger than 10 dwellings. It would not be appropriate or sustainable for the need for affordable housing to only be met within the east of the Borough. Design controls would apply equally to market and affordable housing.</p> <p>Affordable homes secured through the planning system will be subject to restrictions secured through planning conditions and obligations.</p>

There is insufficient affordable housing provision in the proposals

Total comments	Comment IDs	Summary of issue raised in comments	Wirral Council response to issue
130	31, 46, 48, 49, 187, 192, 205, 246, 293, 294, 310, 326, 341, 368, 372, 414, 437, 444, 466, 477, 493, 494, 512, 576, 591, 593, 981, 2003, 2007, 2017, 2020, 2044, 2059, 2068, 2076, 2079, 2098, 2117, 2126, 2130, 2141, 2157, 2180, 2204, 2205, 2216, 2228, 2240, 2284, 2294, 2308, 2394, 2403, 2408, 2428, 2453, 2467, 2475, 2489, 2503, 2505, 2514,	<p>More support for the proposals would exist were there greater provision of affordable housing. The location of many of the sites proposed in the consultation in affluent areas of the Wirral means that new homes to be provided will be unaffordable to those in need. As such, it is questionable whether those sites are in the right locations.</p> <p>Developers are not concerned with providing affordable housing. They must be forced to provide affordable housing in their proposals instead. Affordable housing is key to keeping the young population / young families within Wirral. This should be a key concern in the Local Plan.</p>	<p>Support is noted. The Draft Wirral Strategic Housing Market Assessment 2020 identifies the areas of greatest need of affordable housing within the Borough. The proposed approach to the delivery of affordable housing is set out in the Local Plan Issues and Options document. The preferred approach seeks to develop a mix of different types and size of housing in all locations across the Borough, with up to 30% affordable housing on all sites larger than 10 dwellings. The Local Plan Economic Viability Baseline Update 2018 shows the locations most able support the provision of affordable housing.</p> <p>The Local Plan will require the provision of affordable housing in suitable locations. The preferred approach is set out in the Local Plan Issues and Options document.</p>

Total comments	Comment IDs	Summary of issue raised in comments	Wirral Council response to issue
	2533, 2552, 2554, 2574, 2577, 2579, 2582, 2586, 2620, 2621, 2634, 2639, 2643, 2660, 2669, 2670, 2675, 2678, 2685, 2686, 2700, 2702, 2704, 2713, 2715, 2718, 2721, 2725, 2733, 2744, 2747, 2757, 2764, 2782, 2795, 2799, 2801, 2803, 2813, 2826, 2834, 2837, 2845, 2847, 2850, 2858, 2860, 2861, 2871, 2876, 2884, 2885, 2892, 2908, 2951, 2958, 2995, 3001, 3017, 3031, 3038, 3042, 3046, 3049, 3081, 3088, 3096		

Providing the right mix and tenure of housing also needs to be considered

Total comments	Comment IDs	Summary of issue raised in comments	Wirral Council response to issue
8	274, 279, 516, 584, 763, 845, 2560, 2638	Note the high population of elderly residents in Wirral – the Council needs to provide housing for this demographic.	The Draft Wirral Strategic Housing Market Assessment 2020 seeks to quantify these requirements, to enable the Local Plan to secure a range of types of new home to meet the needs of older residents.
		The Local Plan needs to provide a larger number of high-density homes and provide less 'conventional' density suburban family housing.	The Draft Wirral Strategic Housing Market Assessment 2020 sets out the different type, size and tenure of dwellings that are likely to be required over the Plan period. Proposals for a new approach to housing density are now set out within the Wirral Housing Density Study Interim Report 2019.
		More family homes are required, and those built need to provide better amenity spaces than are otherwise the norm. High quality design should be implemented into all the proposals to ensure that new homes contribute to a positive sense of place.	The Draft Wirral Strategic Housing Market Assessment 2020 sets out the different type, size and tenure of dwellings that are likely to be required over the Plan period. The importance of design is reflected in Strategic Objective 8 in the Local Plan Issues and Options document, which will be carried forward into the detailed policies to be included in the stage of the preparation of the Local Plan.

Provision for the Gypsy and Traveller community

Total comments	Comment IDs	Summary of issue raised in comments	Wirral Council response to issue
1	1101	The needs of Wirral's Gypsy and Traveller community have not been factored into proposals – there was an established need in the 2014 Gypsy and Traveller needs assessment for 4 transit pitches and 7 permanent pitches by 2019.	The Wirral Gypsy and Traveller Accommodation Assessment 2019, which has replaced the 2014 assessment, shows more limited housing needs and the preferred approach in the Local Plan Issues and Options document is to include a criteria-based policy in the final Local Plan.

The Sustainability of New Development

The health and wellbeing of residents is not being adequately considered

Total comments	Comment IDs	Summary of issue raised in comments	Wirral Council response to issue
161	2, 4, 5, 6, 17, 30, 42, 55, 87, 146, 169, 170, 173, 184, 189, 195, 198, 212, 213, 230, 232, 234, 238, 239, 255, 266, 269, 270, 278, 283, 286, 289, 315, 338, 342, 356, 365, 372, 408, 410, 416, 417, 424, 429, 459, 468, 471, 475, 476, 479, 502, 503, 506, 510, 515, 516, 525, 529, 545, 558, 562, 564, 571, 575, 577, 581, 589, 920, 1903, 2009, 2048, 2085, 2086, 2094, 2096, 2113, 2118, 2136, 2138, 2139, 2149, 2151, 2156, 2161, 2172, 2183, 2187, 2215, 2241, 2248, 2274, 2276, 2281, 2284, 2291, 2295, 2296, 2299, 2311, 2331, 2344, 2363, 2366, 2368, 2375, 2388, 2389, 2391, 2395, 2404, 2422, 2450, 2453, 2464, 2490, 2519, 2527, 2536, 2537,	<p>Concerns over the increase in crime rates – Merseyside Police already struggle to cope with existing population levels, new housing will make the situation worse.</p> <p>Uneven development will widen social division, the houses built on Green Belt land will be for affluent members of society while the redevelopment of the town centres will exacerbate deprivation.</p> <p>Development of Green Belt land around Wirral demonstrates the Council's lack of commitment to health and wellbeing – Green Belt land should be kept open to provide vital recreational opportunities for residents. The Green Belt and green spaces across Wirral are vital for the mental health of Wirral residents. Numerous studies show the link between green space and mental wellbeing.</p>	<p>Police funding is based on a national funding formula which takes account of changes in the local population. The new Local Plan also provides an opportunity to further embed 'Secured by Design' principles², to ensure that crime and antisocial behaviour is more effectively discouraged in new development.</p> <p>The Draft Wirral Strategic Housing Market Assessment 2020 identifies the areas of greatest need of affordable housing, the needs of different groups within the population and the different type, size and tenure of dwellings that are likely to be required over the Plan period. The preferred approach set out within the Local Plan Issues and Options document, is to promote regeneration within the older urban areas and to reflect the needs of different groups and the mix of different type, size and tenure that are needed within new developments.</p> <p>No decision has yet been taken to release land from the Green Belt. The Council's preferred option is to use only urban sites to meet the Borough's future housing and employment needs. An up-to-date assessment of existing open space is set out in the Draft Wirral Open Space Assessment Report 2019 and proposals for potential future standards in the Draft Wirral Open Space Standards Paper 2020. A list of proposed urban sites for protection is included in Appendix 8.1 of the Local Plan Issues and Options document and is shown on the draft Policies Map which can be viewed at https://www.wirral.gov.uk/planning-and-building/local-plans-and-planning-policy/wirral-new-local-plan/local-plan/issues-and. Existing recreational space has been excluded from the areas of land identified in Options 2A and 2B in the Local Plan Issues and Options document. A Green and Blue Infrastructure Strategy is now also in preparation.</p>

² <https://www.securedbydesign.com/>

Total comments	Comment IDs	Summary of issue raised in comments	Wirral Council response to issue
	2545, 2553, 2586, 2590, 2595, 2606, 2629, 2632, 2635, 2645, 2660, 2664, 2691, 2703, 2720, 2736, 2738, 2744, 2756, 2791, 2806, 2807, 2810, 2821, 2829, 2859, 2868, 2869, 2870, 2879, 2881, 2892, 2895, 2902, 2922, 2937, 2964, 3004, 3028, 3052, 3086, 3148	New developments proposed around Wirral will result in disturbance for existing neighbouring residents from traffic noise, pollution and construction traffic. There is a scientific link between living in close proximity to a motorway and respiratory problems, particularly in children. No development should take place along the M53.	The impact of construction will be controlled through planning conditions and agreed methods of working. The final sites to be selected will be subject to a full sustainability appraisal, which will include the impact on health and amenity. Policies to prevent unacceptable risks to human health with measures to address air quality will be included in the final draft Local Plan to be submitted to the Secretary of State.

The quantum of development proposed will have an adverse impact on climate change and CO2 emissions

Total comments	Comment IDs	Summary of issue raised in comments	Wirral Council response to issue
54	217, 239, 250, 270, 296, 341, 392, 403, 424, 429, 463, 475, 505, 587, 2063, 2082, 2102, 2161, 2202, 2221, 2274, 2311, 2318, 2368, 2427, 2492, 2508, 2537, 2570, 2578, 2586, 2590, 2608, 2635, 2650, 2664, 2668, 2682, 2701, 2706, 2712, 2721, 2766, 2776, 2788, 2922, 2959, 2986, 3040, 3044, 3069, 3091, 3093, 3116,	<p>There is insufficient consideration for sustainable developments or garden towns, which would have a greater critical mass and be more self-sufficient.</p> <p>Developments should incorporate energy saving infrastructure and environmentally friendly / energy efficient design principles into homes.</p>	<p>The Local Plan Issues and Options document sets out the options that are currently available, which outside the existing urban area include dispersed and more concentrated approaches, alongside a summary of their potential benefits and disadvantages. A new settlement has so far been discounted because of the existing geography of Wirral, the configuration of the existing urban area, the pattern of strongly, moderately and weakly performing parcels against the purposes of the Green Belt, the scale of the development likely to be required and the absence of an obviously sustainable location, with access by a wide choice of sustainable transport.</p> <p>Strategic Objective 4 in the Local Plan Issues and Options document sets out the intention to promote appropriate renewable energy and green technologies and to transition to a low carbon Borough. Draft policies, which are proposed to be updated and carried over into the next stage of the Local Plan, were included in the Proposed Submission Draft Core Strategy, which can still be viewed on the Council's website at https://www.wirral.gov.uk/planning-and-building/local-plans-and-planning-policy/local-plans/core-strategy-local-plan (Policy CS43 refers).</p>

Total comments	Comment IDs	Summary of issue raised in comments	Wirral Council response to issue
		<p>The sites being proposed would result in more car dependency and perpetuate existing sustainability issues. Development would be much better supported if it was supported by investment in sustainable transport.</p>	<p>Wirral already has a well-developed public transport network. The sites proposed for inclusion in the Local Plan Issues and Options document have been assessed for their transport and accessibility impacts. Proposals for further improvements to sustainable transport will be considered within the emerging Wirral Infrastructure Delivery Plan, for which a Baseline 2020 report has been prepared. The Wirral Housing Density Study will, in addition, seek to focus higher density development around locations where sustainable travel, such as walking, cycling and public transport can most easily be supported.</p>

Infrastructure Capacity

There are fundamental constraints in Wirral's transport network

Total comments	Comment IDs	Summary of issue raised in comments	Wirral Council response to issue
110	2, 3, 39, 398, 400, 408, 410, 416, 417, 431, 433, 455, 461, 462, 465, 468, 475, 480, 485, 488, 506, 514, 515, 518, 519, 529, 553, 560, 773, 789, 966, 2040, 2048, 2052, 2066, 2070, 2078, 2085, 2130, 2139, 2194, 2245, 2294, 2296, 2312, 2324, 2328, 2391, 2411, 2470, 2502, 2506, 2508, 2509, 2514, 2515, 2523, 2528, 2537, 2545, 2554, 2557, 2572, 2574, 2578, 2590, 2591, 2606, 2607, 2608, 2617, 2628, 2629, 2630, 2635, 2642, 2643, 2660, 2664, 2673, 2679, 2690, 2701, 2702, 2704, 2712, 2717, 2720, 2721, 2722, 2723, 2734, 2739, 2744, 2766, 2768, 2774, 2776, 2791, 2806, 2815, 2821, 2864, 2890, 2891, 2908, 2934, 2997, 3068, 3080, 3141	There is a lack of public transport around Wirral at present, this should be addressed before undertaking new development. Avon buses recently went out of business, leaving some areas of Wirral unserved by public transport.	Wirral already has a well-developed public transport network. The sites proposed for inclusion in the Local Plan Issues and Options document have been assessed for their transport and accessibility impacts. Proposals for further improvements to public transport will be considered within the emerging Wirral Infrastructure Delivery Plan, for which a Baseline 2020 report has been prepared for public comment.
		There are various roads and junctions around Wirral which suffer severe traffic congestion – additional development will create an unacceptable situation.	A Wirral Local Plan Baseline Modelling Report and a Wirral Local Plan Spatial Options Modelling Report have been published alongside the Local Plan Issues and Options document. Further transport modelling will be undertaken as part of the next stage of the Local Plan, to identify any on-and off-site improvements and any other mitigation measures that may need to be included in the emerging Wirral Infrastructure Delivery Plan, for which a Baseline 2020 report has been prepared for public comment.
		There aren't enough car parks serving town centres to support any more housing, especially considering that various car parks around Wirral are being proposed for new housing.	The need for car parking in town centres will be assessed on a case by case basis alongside wider policy objectives. For example, Strategic Objective 3 in the Local Plan Issues and Options document sets out the intention to support more sustainable travel solutions, to improve air quality, support behaviour change and reduce congestion; and the Wirral Housing Density Study will seek to focus higher density development around locations where sustainable travel, such as walking, cycling and public transport can most easily be supported, to reduce the need to identify land outside the existing urban area.
		There are many blind spots and traffic accident blackspots across Wirral where developments are proposed. This is particularly concerning given that they are near schools.	The impact on road safety is a routine consideration within the planning application process, in consultation with the local highway authority. Proposals for any further necessary improvements will be considered as part of any future site allocations and within the emerging Wirral Infrastructure Delivery Plan, for which a Baseline 2020 report has been prepared.

Total comments	Comment IDs	Summary of issue raised in comments	Wirral Council response to issue
		The M53 south of Wirral towards Chester, between Junctions 5 and 11, operates beyond capacity and will need to be factored into growth proposals.	The impact on the M53 Motorway will continue to be discussed with Highways England and with Cheshire West and Chester Council, in line with the findings of the Wirral Local Plan Baseline Modelling Report and the Wirral Local Plan Spatial Options Modelling Report, as part of the Council's wider legal duty to co-operate, before the final proposals are prepared for inclusion in the draft Local Plan to be submitted to the Secretary of State.

Unclear approach to infrastructure provision

Total comments	Comment IDs	Summary of issue raised in comments	Wirral Council response to issue
1	290	It is unclear from the consultation what approach will be taken to the protection of infrastructure assets – particularly marine/port infrastructure. Operational port land should be designated, with a specific ports policy in the plan.	Appendix 9.1 of the Local Plan Issues and Options document indicates the intention to include a specific policy on port-related development in the final draft Local Plan (Policy LP16) but the detailed wording will not be set out until Regulation 19. The dock estates are currently shown as proposed Primarily Industrial Areas on the draft Policies Map which can be viewed at https://www.wirral.gov.uk/planning-and-building/local-plans-and-planning-policy/wirral-new-local-plan/local-plan/issues-and-

Council's Approach to the Local Plan Process

The Council has mismanaged the Local Plan process and consultations undertaken

Total comments	Comment IDs	Summary of issue raised in comments	Wirral Council response to issue
51	233, 244, 501, 540, 547, 549, 552, 570, 747, 806, 859, 883, 2135, 2175, 2229, 2264, 2286, 2302, 2379, 2385, 2420, 2507, 2519, 2520, 2530, 2543, 2544, 2563, 2574, 2580, 2591, 2639, 2645, 2666, 2738, 2739, 2741, 2743, 2747, 2764, 2784, 2801, 2806, 2811, 2849, 2884, 2888, 2896, 2906, 2931, 2990, 3087	<p>The levels of housebuilding now required of the Council are only necessary because it has previously failed to build enough homes – residents are now being punished for the Council's failures.</p> <p>Residents should have been informed earlier of the proposals.</p> <p>Not all documents relevant to the consultation have been made available to the public – for example the Broad Spatial Options Revised Assessment Report, Development Viability Baseline Report and 2018 Strategic Housing Land Availability Assessment.</p>	<p>The Council does not build new homes, which are provided by housebuilders, developers and registered social housing providers. The levels of housebuilding now required reflect the revocation of the Regional Spatial Strategy for the North West to 2021, which sought to concentrate investment into the cities of Liverpool and Manchester and a change in national policy, to support the Government's objective of significantly boosting the supply of homes to reach a national goal of delivering 300,000 new homes a year by the mid-2020s.</p> <p>Local Plans are prepared in accordance with a statutory process which includes consultation with the local community. The Council had previously consulted on the findings and implications of the assessed need for new housing in Wirral, following the revocation of the Regional Spatial Strategy for the North West, in August 2016, which can be still be viewed on the Council's website at https://www.wirral.gov.uk/planning-and-building/local-plans-and-planning-policy/local-plans/core-strategy-local-plan/further-0. The Council consulted the public on the findings of the development options review as soon as the site-specific information became available. Revised proposals are now set out for further public comment in the Local Plan Issues and Options document and on the draft Policies Map which can now be viewed at https://www.wirral.gov.uk/planning-and-building/local-plans-and-planning-policy/wirral-new-local-plan/local-plan/issues-and..</p> <p>Although not all the documents anticipated to be published could be completed in time for public consultation to begin, the site-specific findings of the development options review and their underlying assumptions were nevertheless placed under significant public scrutiny. Given the volume and detail of the comments received, the Council is satisfied that residents were provided with sufficient information to make a well-informed response to the main issues under consideration. An up-to-date SHLAA, Development Viability Baseline Report and Sustainability Appraisal are now available for public comment alongside the Local Plan Issues and Options document.</p>

Total comments	Comment IDs	Summary of issue raised in comments	Wirral Council response to issue
		<p>The Council has not published the results of consultation on the 2018 Green Belt Review, and it is therefore very difficult to comment objectively on the Green Belt sites in the consultation.</p>	<p>Although the comments on the draft methodology for the Council's Initial Review of the Green Belt had not been published, the draft and final methodology and its results were both fully available for public comment. The Council's Initial Review of the Green Belt has now been replaced by the fully revised, Green Belt Review 2019, prepared by specialist planning consultants, to address the comments received,</p>
		<p>Information given by Wirral Council has been lacking, confusing or is not up to date e.g. some developments have already begun.</p>	<p>While monitoring information will inevitably become out-of-date as soon as it has been collected, a full suite of the most up-to-date evidence has now been published alongside the Local Plan Issues and Options document, with a base date for housing information of April 2019. Data for April 2020 will form the basis of the final draft Plan to be submitted to the Secretary of State for public examination, which will be published for public comment in autumn 2020.</p>
		<p>The Council should have provided more information about site ownership, potential interests in land and details of discussions which have taken place to provide developers with enough confidence to promote their land.</p>	<p>Developers routinely submit sites for consideration for future development, some of which come forward to actual proposals and some of which do not. Details such as site ownership, potential interests in land and details of discussions are therefore normally held to be confidential unless the parties have agreed to them being made public, for example, through the publication of a planning application or other publicly published proposal. The issues to be addressed in a Local Plan are the principle of any development on a particular site and the policies that should be applied to it were it to come forward as a planning application, irrespective of the ownership or other interest in the site. Information on the latest sites under consideration are now set out within the Local Plan Issues and Options document and the SHLAA 2019.</p>

Total comments	Comment IDs	Summary of issue raised in comments	Wirral Council response to issue
		Wirral residents were not given enough time during the consultation to review the options presented.	Formal consultation was undertaken for a period of nearly eight weeks, between 3 September 2018 and 26 October 2018, supported by neighbour notification letters and a series of public meetings, which was longer than the minimum period of six weeks required by Regulation 17 of the Town and Country Planning (Local Planning) (England) Regulations 2012 ³ . The proposals were also widely publicly reported as soon as the first documents were approved for consultation in July 2018. Given the volume and detail of the comments received, the Council is satisfied that residents were provided with sufficient time to consider and respond to the options presented. Revised proposals are now set out for public comment in the Local Plan Issues and Options document.
		Paying outside consultants to undertake work for the Council is a waste of money, and some consultants also have a conflict of interest with housing developers.	The Council only uses consultants where necessary to provide additional specialist expertise or independent research, analysis and advice and to provide additional professional capacity for its existing planning teams to deliver work to an agreed timetable. The Council's procurement and legal processes ensure that only consultants that can demonstrate no conflicts of interest are employed.
		Barnston has more to lose than any other settlement as a result of the proposals, yet it was denied the opportunity for a public meeting where the proposals could be discussed.	Public meetings were held in a variety of locations throughout the Borough, including two venues in west Wirral. Two drop-in sessions and four public briefing events were held at Pensby Boys School and consultation documents were made available on-line and in all public libraries across the Borough. Given the volume and detail of the comments received, the Council is satisfied that residents were provided with sufficient opportunity time to consider and respond to the options presented. Revised proposals are now set out for public comment in the Local Plan Issues and Options document and will be widely publicised, with public drop in sessions at Heswall Library and West Kirby Concourse.
		The Council are only pushing for high housing targets so that they can get potentially higher council tax receipts.	The Council has previously assessed local housing needs using standard methodologies used throughout the country, in line with national policy and guidance. Since February 2019, the National Planning Policy Framework has required a local housing need assessment to be undertaken using a standard method based on nationally published household projections, house prices and local incomes (NPPF, paragraph 60 refers).

³ <http://www.legislation.gov.uk/uksi/2012/767/regulation/17/made>

Miscellaneous

Housing developers are only concerned about profit

Total comments	Comment IDs	Summary of issue raised in comments	Wirral Council response to issue
96	22, 45, 59, 229, 236, 284, 287, 359, 369, 372, 436, 466, 493, 536, 550, 561, 593, 600, 2044, 2047, 2059, 2075, 2117, 2143, 2158, 2223, 2225, 2244, 2264, 2272, 2289, 2324, 2333, 2396, 2403, 2415, 2463, 2475, 2503, 2514, 2533, 2537, 2552, 2554, 2555, 2567, 2574, 2591, 2609, 2632, 2634, 2643, 2647, 2660, 2673, 2678, 2680, 2713, 2718, 2724, 2729, 2738, 2739, 2714, 2742, 2747, 2751, 2757, 2762, 2782, 2785, 2799, 2801, 2812, 2823, 2826, 2835, 2836, 2846, 2847, 2850, 2876, 2878, 2884, 2897, 2899, 2900, 2901, 2952, 2955, 3010, 3056, 3090, 3091, 3148	More effort should be put into delivering housing with existing planning permission, and not now allowing developers an easy ride by building elsewhere instead.	The Council's Housing Delivery Test Action Plan ⁴ sets out a range of steps which the Council is undertaking to boost the delivery of sites, including sites that have been subject to a current or previous planning permission. This includes the establishment of a multi-disciplinary Housing Delivery Team, forming a Strategic Partnership with Homes England and the formation of a private sector Developers Forum. These will enable the Council to proactively address delivery issues and work with developers to resolve them, to minimise the number of dwellings needing to be built elsewhere. The proposed allocations for housing identified in the Local Plan Issues and Options document include sites where planning permission has already been granted.
		Concerns that Peel Holdings and other developers are 'land banking' and delaying construction of new properties in order to profit from rising land values.	The Council is actively working with Peel and other landowners, developers and funding partners to support delivery as quickly as possible within the Plan period. The Local Plan Issues and Options document sets out the current position, taking account of the most recent proposals and planning applications.
		Developers are the wrong people to be undertaking development – they do not share the same motives and interests as the communities that will be impacted by development. The Council should compulsorily purchase land and undertake development itself.	The Council is not a developer or housebuilder and relies on development undertaken by others even on sites that it owns. The costs and risks associated with purchasing and developing large numbers of additional sites would be unduly prohibitive, particularly when specialist housebuilders and developers will actively promote and develop sites themselves, regulated through the planning system.

⁴ <https://www.wirral.gov.uk/planning-and-building/local-plans-and-planning-policy/housing-delivery-action-plan>

Concerns about the viability of the plan

Total comments	Comment IDs	Summary of issue raised in comments	Wirral Council response to issue
4	542, 572, 578, 2596	The cost of infrastructure will limit the viability of development, which is already challenging in some areas of the Wirral.	The Local Plan Issues and Options document takes account of viability both as part of the context and evidence for the Plan strategy and in the identification 'deliverable' and 'developable' sites and the Local Plan Economic Viability Baseline Update 2018 sets out the latest high-level assessment of development viability across the Borough.
		Green Belt sites are often isolated and will be very costly to make sustainable in terms of infrastructure provision.	Infrastructure requirements and viability will be a key element in whether any sites can be classed as 'deliverable' or 'developable', if not enough sites can be identified within the urban area.

Concerns about length of the plan period

Total comments	Comment IDs	Summary of issue raised in comments	Wirral Council response to issue
1	747	The Council should consider a plan period of longer than 15 years, given the very outdated nature of the current plan and the time taken to prepare its replacement.	The National Planning Policy Framework states that strategic policies should look ahead over a minimum 15-year period from adoption (paragraph 22) and that policies in local plans should be reviewed at least once every five years (paragraph 33). The Local Plan Issues and Options document envisages a Plan period of 15 years from 2020 to 2035 but already notes that some proposals, such as the larger schemes at Wirral Waters and within the broad locations for emerging regeneration initiatives will continue to deliver development beyond the Plan period.

Needs for fire service provision

Total comments	Comment IDs	Summary of issue raised in comments	Wirral Council response to issue
1	50	Consideration needs to be given to the location of fire hydrants, the ease of access for emergency vehicles in new development and the impacts of new development on statutory provision for fire and rescue services.	The locations of fire hydrants and accessibility for emergency vehicles are routine considerations within planning application and building regulations processes, in consultation with the relevant emergency services providers. The wider impacts on the provision of emergency services, including fire and rescue service provision, will be considered within the emerging Wirral Infrastructure Delivery Plan, for which a Baseline 2020 report has been prepared for public comment.