

Wirral Council
**STRATEGIC HOUSING LAND AVAILABILITY
ASSESSMENT: VOLUME 1 - MAIN REPORT**



ROGER TYM & PARTNERS
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Main Report - Final Version
July 2010

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Foreword

This document is the first Strategic Housing Land Availability Assessment (SHLAA) for Wirral. The SHLAA considers the potential supply of housing across the Borough up to 2026 from a base date of April 2008. The SHLAA is a technical background study of housing potential, working on the best available information at a point in time; this means it is not necessarily fully inclusive.

Between April 2008 and the publication of this report, it is likely that some circumstances will have changed such as, for instance, resolutions to grant planning permission on particular sites. The SHLAA will be updated to ensure that the assumptions within it and the estimates of supply are as up to date as possible.

The SHLAA forms part of the Local Development Framework (LDF) evidence base, along with a range of other technical studies. The inclusion of any site in this report should not be taken as a Council endorsement of its future development and does not in any way prejudice decisions to be taken by the Council in relation to preferred directions of growth in the Core Strategy, site identification in site-specific Development Plan Documents (DPDs) or the determination of individual planning applications.

The Council will use the SHLAA as a starting point for its consideration of which sites to bring forward as allocations in a site-specific Land Allocations DPD. Further work will be required in order to ensure that the identification of sites in the Land Allocations DPD is based on sound and up to date information.

If you have more up to date information that you feel will be relevant to the first SHLAA update, and would help in analysing the full potential of any site, please contact the Council's Forward Planning section on (tel) 0151 691 8225.

Wirral Council

Glossary

Abbreviation	Full Title/Definition
APS	A.P. Sheehan & Co
CLG	Communities and Local Government (Government Department, formerly the ODPM and before that the DETR)
CSH	Code for Sustainable Homes
DETR	Department of the Environment, Transport and the Regions (former Government Department, now the CLG)
DPA	Dwellings per Annum
DPH	Dwellings per Hectare
DPD	Development Plan Document
HMR	Housing Market Renewal
IPP	Interim Planning Policy
LDD	Local Development Document
LDF	Local Development Framework
LNR	Local Nature Reserve
LPA	Local Planning Authority
MDS	Major Developed Site (in the Green Belt)
NGP	New Growth Point
PDL	Previously Developed Land
PP	Planning Permission
PPG	Planning Policy Guidance
PPS	Planning Policy Statement
RDF	Regional Development Framework
RTP	Roger Tym & Partners
RSL	Registered Social Landlord
RSS	Regional Spatial Strategy
SBI	Site of Biological Importance
SHLAA	Strategic Housing Land Availability Assessment
SIINC	Site of International Importance for Nature Conservation
SLIES	Site of Local Importance for Earth Science
SSSI	Site of Special Scientific Interest
UDP	Unitary Development Plan
VAT	Value Added Tax

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APPENDICES

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1 INTRODUCTION

Purpose of the Study

- 1.1 Roger Tym & Partners, supported by A.P. Sheehan & Co, was jointly commissioned by Liverpool City Council and Wirral Council in May 2009 to undertake a Strategic Housing Land Availability Assessment (SHLAA) across Liverpool and Wirral. We have worked to slightly different timescales for the Liverpool and Wirral elements and have produced separate SHLAA reports for each district. A separate New Growth Point SHLAA Statement will also be produced, which will establish whether the housing targets under the Mersey Heartlands New Growth Point as a whole - for both the Liverpool and Wirral parts of it - can be met.
- 1.2 In this report, we provide the findings from our assessment of housing potential in Wirral only. As required by national planning policy in PPS3, the essential purpose of the Wirral SHLAA is to identify sufficient 'deliverable' sites to meet the 5-year dwelling targets for Wirral, and to identify further 'developable' sites to meet the 10, 15 and 18-year dwelling targets¹.
- 1.3 As well as sites which already had planning permission for housing at the study base date (1 April 2008), we have assessed more than 600 additional sites (both urban greenfield and brownfield)² in accordance with the CLG's SHLAA Practice Guidance of July 2007³.
- 1.4 **It is important to emphasise that the SHLAA is a technical study which forms part of the LDF evidence base, along with a range of other technical studies. It does not in any way prejudice decisions to be taken by Wirral Council in relation to preferred directions of growth in the emerging Core Strategy, site identification in site-specific Development Plan Documents (DPDs) or the determination of planning applications.**

Stakeholder Involvement

- 1.5 Reflecting advice in the Guidance that stakeholders should be engaged in the SHLAA process from the outset, we have undertaken a range of consultation exercises to inform the study, as listed below:
 - an initial meeting on Thursday 7 May 2009 at Liverpool City Council's offices with the Steering Group, which comprises representatives from a range of housebuilders, RSLs, regeneration agencies, adjacent local authorities and NewHeartlands (the Housing Market Renewal body for inner Merseyside);

¹ Paragraphs 34, 53 and 55 of PPS3 require LPAs to identify a supply of deliverable sites for the first 5 years, and a further supply of developable sites for years 6-10 and, where possible, for years 11-15. The Core Strategy will run until 2026, however, and so we have also considered a fourth period, which means the study covers the period 2008-26.

² The initial list of potential housing sites which were supplied to us by the Council contained around 950 sites, which was reduced to 608 sites through the filtering exercise described in Section 3.

³ Hereafter referred to as 'the Guidance'.

- consultation with strategic public sector bodies including Natural England and the Environment Agency, as well as utilities providers such as National Grid and United Utilities (none of which identified any strategic constraints to development);
- consultations with local property market agents, developers and housebuilders; and
- we also considered sites that were submitted through the “call-for-sites” exercises which the Council conducted in 2007 and 2009. All relevant information that was gathered from the call for sites submissions has been fed into our database and used to inform the site assessments.

1.6 All of the very useful and informative dialogue described above - as well as close liaison with Council officers throughout the study - has informed our work and has helped to ensure that the study outputs are as robust as possible. We submitted our draft final report and associated volumes/other outputs to the Council in February 2010. In refining our outputs we have taken account of the constructive feedback that we received following extensive checking of the draft study outputs by the Council between February and May 2010.

Structure of Our Report

1.7 The remainder of our report is structured as follows:

- Section 2 contains a review of the national, regional and local planning policy contexts, as well as the requirements of the SHLAA Practice Guidance;
- Section 3 describes the methodology that we employed for the study;
- Section 4 provides the results from the study and assesses whether the RSS-based dwelling targets, as well as the higher Growth Point based targets, can be achieved; and
- Section 5 considers whether there is a need to identify ‘broad locations’, and/or to make a windfall allowance.

1.8 Our overall study outputs are as follows:

- Volume 1 - ‘Main Report’;
- Volume 2 - ‘Appendices to the Main Report’⁴;
- the Microsoft Access Sites Database, which contains details of the 608 sites that we have assessed⁵; and
- a MapInfo GIS layer which contains digitised polygons (site boundaries) for the 608 sites in our Sites Database.

1.9 A.P. Sheehan & Co has also completed a total of 121 development appraisals. Each appraisal consists of a number of very wide Excel spreadsheets which are not possible to reproduce as a discrete report; instead, the 121 completed appraisals have been provided

⁴ Any references in our report to ‘Appendices’ relate to the Appendices that are contained in Volume 2.

⁵ The database does not contain details of the 538 sites which had planning permission for residential use at the study base date, which were assessed through separate analysis as detailed in Section 4 of our report.

to the Council as free-standing outputs. The purpose of the appraisals is explained in Section 3 of our report, together with details of how they were undertaken.

2 NATIONAL, REGIONAL AND LOCAL PLANNING POLICY

National Planning Policy

Planning Policy Statement 3: Housing (November 2006)

- 2.1 PPS3 establishes the requirement for LPAs to undertake SHLAAs, which replace the housing capacity studies required under PPG3 (the precursor to PPS3). The fundamental requirement placed upon LPAs by paragraphs 54 and 55 of PPS3 is to *'identify specific, deliverable sites for the first five years of a plan that are ready for development'*. Furthermore, Annex C of PPS3 states that a SHLAA should:
- assess the likely level of housing that could be provided if unimplemented planning permissions were brought into development;
 - assess land availability by identifying buildings or areas of land (including previously developed and greenfield land) that have development potential for housing, including within mixed use developments;
 - assess the potential level of housing that can be provided on identified land;
 - where appropriate, evaluate past trends in windfall land coming forward for development and estimate the likely future implementation rate;
 - identify constraints that might make a particular site unavailable and/or unviable for development;
 - identify sustainability issues and physical constraints that might make a site unsuitable for development; and
 - identify what action could be taken to overcome constraints on particular sites.
- 2.2 PPS3 states that LPAs should set out in Local Development Documents (LDDs) their policies and strategies for delivering housing, and that they should identify sufficient land to enable continuous delivery of housing for at least 15 years from the date of adoption, taking account of the level of housing provision set out in the RSS.
- 2.3 One of the key differences between PPS3 and PPG3 is that windfall allowances should no longer be included in the first 10 years of land supply in LDFs, unless there are *'genuine local circumstances that prevent specific sites being identified. In these circumstances, an allowance should be included but should be realistic having regard to...historic windfall delivery rates and expected future trends'*. This places greater emphasis on the need to identify sites which can be confidently allocated for housing in LDFs.
- 2.4 PPS3 reiterates the previous PPG3 policy that the priority for development should be PDL - in particular, vacant and derelict sites and buildings - and it requires LPAs to ensure that sufficient, suitable land is available to achieve their PDL delivery objectives. However, unlike housing capacity studies under PPG3, SHLAAs are required to consider the potential of greenfield sites to deliver housing, as well as PDL.
- 2.5 PPS3 states that LDDs should contain a local PDL target and trajectory, and strategies for bringing PDL into housing use. Where appropriate, the trajectory could be divided up to

reflect the contribution expected from different categories of PDL - for example, vacant and derelict sites - in order to deliver the spatial vision for the area in the most sustainable way. In developing their PDL strategies, LPAs are advised (in paragraph 44) that they:

'should consider a range of incentives or interventions that could help to ensure that previously developed land is developed in line with the trajectory/ies. This should include:

- *planning to address obstacles to the development of vacant and derelict sites and buildings, for example, use of compulsory purchase powers where that would help resolve land ownership or assembly issues.*
- *considering whether sites that are currently allocated for industrial or commercial use could be more appropriately re-allocated for housing development.*
- *encouraging innovative housing schemes that make effective use of public sector previously-developed land.'*

2.6 The content of PPS3, as summarised above, has clear implications for the information to be included and assessed in a SHLAA.

SHLAA Practice Guidance (July 2007)

2.7 The CLG's Practice Guidance for undertaking SHLAAs supersedes the advice in the previous guidance entitled 'Tapping the Potential'⁶, which related to housing capacity studies.

2.8 In paragraph 1, the Guidance states that SHLAAs are '*a key component of the evidence base to support the delivery of sufficient land for housing to meet the community's need for more homes*'. The Guidance emphasises that a SHLAA is significantly different from a housing capacity study, and if a recent capacity study has been carried out, further work will be needed to fulfill the requirements of the SHLAA.

2.9 The Guidance states that the primary role of the SHLAA is to:

- identify sites with potential for housing;
- assess their housing potential; and
- assess when they are likely to be developed.

2.10 A SHLAA should aim to identify as many sites with housing potential in and around as many settlements as possible in the study area. The study area should preferably be a sub-regional housing market area, but may be an LPA area, where necessary. As a minimum, the SHLAA should aim to identify sufficient specific sites for at least the first 10 years of a plan, from the anticipated date of its adoption, and ideally for longer than the whole 15 year plan period. Where it is not possible to identify sufficient sites, the SHLAA should provide the evidence base to support judgements around whether broad locations should be identified and/or whether there are 'genuine local circumstances' that mean a windfall allowance may be justified in the first 10 years of the plan.

⁶ DETR (2000).

- 2.11 Paragraphs 7 and 50 of the Guidance refer to 'genuine local circumstances', but neither paragraph defines what these circumstances might be. However, paragraph 52 does state that '*Coming to an informed view on a windfall allowance means reflecting how comprehensive and intensive the survey has been in identifying sites.*'
- 2.12 Paragraph 8 makes it clear that whilst the assessment is an important evidence source to inform plan-making, it does not in itself determine whether a site should be allocated for housing development. The Guidance also states that the SHLAA should be kept up to date as part of the Annual Monitoring Report exercise, so as to support the updating of the housing trajectory and the five-year supply of specific deliverable sites.
- 2.13 The Guidance provides details on the methodology for a SHLAA, which has eight main stages and two further optional stages covering broad locations and windfalls. The stages are as follows:
- Stage 1: Planning the Assessment;
 - Stage 2: Determining which sources of sites will be included in the Assessment;
 - Stage 3: Desktop review of existing information;
 - Stage 4: Determining which sites and areas will be surveyed;
 - Stage 5: Carrying out the survey;
 - Stage 6: Estimating the housing potential of each site;
 - Stage 7: Assessing when and whether sites are likely to be developed;
 - Stage 8: Review of the Assessment;
 - Stage 9: Identifying and assessing the housing potential of broad locations (when necessary); and
 - Stage 10: Determining the housing potential of windfalls (where justified).
- 2.14 Stage 2 identifies the sources of sites with potential for housing, which consist of sites currently in the planning process as well as those that are not in the planning process, namely:
- allocated employment or other land uses;
 - existing housing allocations, which have not yet been implemented;
 - unimplemented/outstanding planning permissions for housing; and
 - planning permissions for housing that are under construction.
- 2.15 Stage 7 assesses when and whether sites are likely to be developed. Central to this is the consideration of whether sites are suitable, deliverable and developable for housing. 'Suitability' embraces policy restrictions, physical problems/limitations (for instance access, infrastructure, flood risk, ground conditions and contamination), potential impacts (upon the landscape and conservation) and the environmental conditions which would be experienced by prospective residents.
- 2.16 'Availability' considers, '*on best information available*' (paragraph 39 of the Guidance), whether there are any legal or ownership problems, such as multiple ownerships, ransom strips, tenancies or operational requirements of landowners. 'Achievability' is essentially a judgment about the economic viability of a site. It will be affected by market factors, cost

factors (including site preparation costs relating to any physical constraints) and delivery factors (including phasing and build-out rates, which mostly concerns larger sites).

Regional and Local Planning Policy

The North West of England Plan - Regional Spatial Strategy (September 2008)

- 2.17 The Regional Spatial Strategy (RSS) for the North West was published in September 2008, and sets out the broad development strategy for the region in the period to 2021. The RSS replaces Regional Planning Guidance for the North West (RPG13).
- 2.18 Policy RDF1 ('Spatial Priorities') states that the first priority for growth and development should be the regional centres of Liverpool and Manchester. Policy L3 ('Existing Housing Stock and Housing Renewal') asserts that plans and strategies in NewHeartlands (which includes parts of Liverpool, Sefton and Wirral) and other urban areas in the Liverpool City Region (LCR), should respond to the need to restructure housing markets, manage the delivery of new build, reduce vacancy rates to 3 per cent, and make best use of the existing housing stock.
- 2.19 Paragraph 7.18(f) further explains that sufficient new residential development should be delivered in the eastern part of Wirral to support the inner areas as a priority for economic growth and regeneration, including via the Housing Market Renewal (HMR) Pathfinder scheme. Elsewhere in the borough, provision should focus on meeting local and affordable housing needs, with careful monitoring and management of housing provision, to ensure that new housing development does not result in an adverse cumulative impact on local and neighbouring housing markets.
- 2.20 Policy LCR1 ('Liverpool City Region Priorities') states that plans and strategies for the LCR should *'focus a sufficient proportion of new housing development and renewal (and related social and environmental infrastructure) within the inner areas to meet the objectives of the Housing Market Renewal Initiative and, consistent with this, make provision for an increase in the supply of affordable and market housing required to address demographic needs and to support economic growth and regeneration'*.
- 2.21 Furthermore, Policy LCR2 goes on to explain that residential development should be focussed *'in the Inner Areas adjacent to the Regional Centre in order to secure a significant increase in population and to support major regeneration activity'*, with emphasis on *'providing a good range of quality housing in the inner areas in terms of size, type, tenure and affordability with a high quality environment and accessible local facilities and employment opportunities'*. In the outer part of the LCR, Policy LCR3 advocates *'significant intervention in areas where housing market restructuring is required'* and expanding *'the quality and choice of housing'*.
- 2.22 Table 7.1 of the RSS sets out the regional housing targets for the period 2003 to 2021, and makes provision for 9,000 dwellings in Wirral (net of clearance replacement) over this period. This equates to an average net gain per annum of 500 dwellings in the Borough, of which at least 80 per cent should be delivered on PDL.

- 2.23 Importantly, paragraph 7.19 explains that the housing provision figures set out in the RSS should no longer represent maximum thresholds or ‘absolute targets’. Thus, in line with the ‘plan, monitor, manage’ approach which underpins PPS3, the RSS lays the foundations for a more flexible approach to housing provision at the local level, explaining that local authorities can introduce phasing policies and that the annual housing figures may be exceeded, ‘*where justified by evidence of need, demand, affordability and sustainability issues and fit with relevant local and sub-regional strategies*’. Conversely, the RSS also states that ‘*some areas will achieve lower levels [of housing provision] in the early years, for example during major housing renewal, which will be compensated later.*’
- 2.24 The flexibility described above has important implications for Wirral’s 5, 10, 15 and 18-year dwelling targets. There is also a need to take account of any under-provision against the RSS targets since the 2003 base date of the RSS. We return to these issues in Section 4, although Table 2.1 shows what the 5, 10, 15 and 18-year dwelling targets would be if the RSS rate of 500 dwellings per annum (dpa) was applied as an average rate across each of the periods.

Table 2.1 Wirral 5, 10, 15 and 18-Year Dwelling Targets (Based on the RSS Figures as an Average Across Each Five-Year Period)

Avg Dwellings/yr (same average across each 5-year period) ^a	5-Year Dwelling Target	10-Year Dwelling Target	15-Year Dwelling Target	18-Year Dwelling Target
500	2,500	5,000	7,500	9,000

^a The 15 and 18-year target assumes that the RSS target of 500 dpa will continue for a limited period beyond 2021, in accordance with the final sentence of Policy L4.

- 2.25 In July 2008, the Government confirmed ‘Mersey Heartlands’ as one of 21 second-round New Growth Points (NGP). Under the NGP, accelerated housing supply will be pursued alongside housing market renewal in the wider context to provide quality and choice at all levels of the market. The ambition for the Mersey Heartlands NGP is to achieve a level of housing growth that is 20 per cent greater than the dwelling targets set by the RSS⁷.
- 2.26 It is important to note that the 20 per cent uplift is not a formal target; the CLG’s website confirms that ‘*A Growth Point is not a statutory designation*’. However, although the RSS dwelling targets remain the same and have not been increased, the CLG’s website also advises that ‘*Growth Point proposals will be subject to robust testing...through the regional and local planning processes.*’ Accordingly, as well as testing whether the RSS target for Wirral of 500 dpa can be achieved, there is also a need to consider whether 600 dpa could be achieved over the period 2008-17, this being 20 per cent higher than the RSS targets (equating to an increase of 100 dpa).

Wirral Unitary Development Plan (February 2000)

- 2.27 The Wirral Unitary Development Plan (UDP) was adopted in February 2000, and parts of the UDP have been ‘saved’ under the provisions of the Planning and Compulsory

⁷ As shown on the first page of the CLG document entitled ‘Second Round Growth Points - Partnerships for Growth’, which is available here: <http://www.communities.gov.uk/publications/housing/partnershipsforgrowth>

Purchase Act 2004. The main policy of relevance (HSG1), relating to new dwelling requirements, is no longer in force. As such, we do not consider it necessary to provide a detailed account of the UDP's housing policies in this report.

Interim Planning Policy - New Housing Development (October 2005)

- 2.28 The Interim Planning Policy (IPP) for new housing development was adopted in October 2005, and currently remains in force. In summary, the IPP seeks to direct new housing development towards previously developed land within the HMR and other identified regeneration priority areas, and it imposes a restriction on residential development on greenfield land, as well as sites outside the HMR and regeneration priority areas.
- 2.29 The Interim Planning Policy applies to the construction of all new-build dwelling houses and flats, although it will not be applied to nursing homes or residential care homes. The Policy is not, however, an absolute moratorium and allows for exceptions to be made to enable one-for-one replacement and where development will not harm regeneration, will be compatible with surrounding uses, and provide for identified local housing need.

Core Strategy Spatial Options Report (January 2010)

- 2.30 The Core Strategy Spatial Options Report, which sets out various options for future development and investment in Wirral over the period to 2031, was published for consultation on 11 January 2010⁸.
- 2.31 The Council has divided Wirral into eight broad Settlement Areas, as described in Section 2 of the Report. The Spatial Vision for Wirral, which is set out in Section 3, anticipates the provision of new high quality mixed-tenure housing, and associated population growth, in Settlement Areas 1, 2 and 3 - which cover the older urban areas of east Wirral⁹ - as a result of the NewHeartlands HMR initiative and the Mersey Heartlands Growth Point. Furthermore, by 2031, Settlement Area 2 is expected to be halfway through a *'long term transformational programme of development, achieving integrated, high density, mixed-use regeneration to re-create sustainable urban communities at the heart of the older urban areas of east Wirral'*.
- 2.32 The Spatial Vision is underpinned by 11 Spatial Objectives, as set out in Section 4 of the Report. Spatial Objective 3 seeks to support the revitalisation of the housing market and improved housing market conditions in the southern parts of Settlement Area 1, Settlement Area 2 and the northern and eastern parts of Settlement Area 3. Spatial Objective 4 asserts that housing growth will be focussed on the Mersey Heartlands Growth Point in Settlement Area 2, and the surrounding urban areas in Settlement Areas 1 and 3.

⁸ The deadline for receipt of comments is 5 March 2010.

⁹ Settlement Area 1 includes the urban settlements of New Brighton, Liscard, Seacombe, Poulton and Wallasey Village. Settlement Area 2 encompasses the Borough's industrial and commercial heart at Birkenhead, Bidston, Seacombe and Tranmere, centred around the dock system. Settlement Area 3 includes densely developed housing areas surrounding the Dock Estate and the central commercial areas at Birkenhead and Tranmere; lower density settlements at Bidston, Claughton, Oxtan and Prenton; and more modern suburbs at Beechwood, Noctorum and Prenton.

- 2.33 Section 5 of the Report sets out three Broad Spatial Options. Under Broad Spatial Option 1 ('Focused Regeneration'), growth and development would be focused within the older inner areas of east Wirral, and other areas which are in the greatest need of social, economic and environmental regeneration. Broad Spatial Option 1 would therefore focus housing growth almost exclusively on identified regeneration priority areas such as the NewHeartlands HMR Pathfinder area, and new housing elsewhere would be restricted to that which provides for identified local needs. Broad Spatial Option 2 ('Balanced Growth') would also maintain an emphasis on the older urban areas of east Wirral, but '*some growth*' would also be directed across the Borough's other existing urban areas. Under Broad Spatial Option 3 ('Urban Expansion'), the Council would '*actively permit development to take place outside the existing urban areas.*'
- 2.34 Paragraph 6.4 of the Report explains that the Council's main spatial priorities in relation to housing provision are to: secure housing market renewal and population stabilisation within the HMR area; increase the range, choice and quality of housing; and to secure the delivery of the Growth Point. Four main options for the distribution of new dwellings are put forward, which are consistent with the Broad Spatial Options. Thus, Policy Option HD1 would direct new housing development solely into the Growth Point and HMR areas; Policy Option HD2 would extend the distribution of new housing development into the wider RSS Outer Area; and Policy Option HD3 would distribute housing development across the whole of the Borough including the RSS Rural Area.
- 2.35 Policy Option HD4 is intended to deal with the situation where the Growth Point is unable to provide sufficient dwellings to achieve the annual targets, in which case a hybrid approach combining elements of Policy Options HD2 and HD3 could be pursued involving a different balance of numbers between each of the spatial areas. It is acknowledged in paragraph 6.43 that the delivery of the Growth Point will be 'entirely dependant' on Wirral Waters and other sites within the NewHeartlands Pathfinder.
- 2.36 The Report states (paragraph 5.27) that Spatial Option 1 is likely to be the Council's preferred option and that the associated Policy Option HD1 is likely to be the Council's preferred approach to housing distribution. However, at the time of writing, no decisions have yet been taken as to which Spatial Option and Policy Option will be taken forward in the 'Preferred Options' document, which the Council intends to publish later this year. Accordingly, in assessing potential housing sites, we have taken a neutral stance in relation to these emerging policies. As we explain in Appendix 4, the 'Policy Restrictions or Limitations' that we have taken account of relate to Green Belt, Impact on Recreational Open Space, Impact on Nature and Earth Science Conservation, and Impact on Employment Land.

Liverpool City Region Housing Strategy (May 2007)

- 2.37 The Liverpool City Region Housing Strategy seeks to provide a framework for housing investment to support regeneration and economic growth in the City Region. Paragraph 2.7 sets out five objectives, which are to:
- support the economic growth and regeneration of the City Region;

- identify sustainable locations for growth, linked to economic development prospects, sustainable levels of infrastructure, service provision and housing land availability;
- maximise the contribution that regeneration areas can make in supporting the economic development of the City Region;
- provide for a range of affordable housing products across the City Region in recognition of the growing mismatch between income levels and lowest quartile house prices; and
- secure investment in the quality of neighbourhoods as a major economic asset of the City Region in attracting and retaining population.

2.38 The Housing Strategy places Wirral within the 'Functional Northern Housing Market' area (together with Liverpool, Knowsley, Sefton, and West Lancashire). Section 5 of the Strategy explains that the Northern Housing Market area is characterised by:

- an historical trend of population decline (although there is evidence that this trend is beginning to reverse, with several authorities reporting positive growth figures);
- the prevalence of stigmatised markets and low demand (leading to the formation of the NewHeartlands Pathfinder);
- high levels of social rented housing;
- the prevalence of smaller terraced properties and comparatively low levels of larger family housing; and
- a lack of affordable housing (particularly in west Wirral).

2.39 However, the Housing Strategy concludes that there is latent potential within the Northern Market Area which, due to its infrastructure, proximity to employment, and quality of service provision, makes it a sustainable location for residential growth.

2.40 Section 8 of the Housing Strategy sets out seven 'Strategic Enablers' and associated policy recommendations, which are intended to support and maximise the contribution that housing can make to the economic growth, regeneration and social inclusion agendas of the City Region. The headline policy recommendations in respect of the Northern Housing Market area can be summarised as follows:

- prioritise housing development on land surrounding the Regional Centre to support the recovery and growth of the NewHeartlands area and the contribution that it can make to the economic regeneration of the City Region;
- local authorities within the Northern Housing Market area should work together to support delivery of the Pathfinder programme and the regeneration of the most vulnerable neighbourhoods outside the Pathfinder;
- prioritise development of a range of larger 'aspirational' house types within the Northern Housing Market to meet requirements linked to economic growth and to address stock deficits; and
- within functional markets, local authorities should develop complementary LDF policies in order to jointly deliver appropriate levels of affordable housing (social and intermediate) based on housing needs survey evidence.

NewHeartlands Housing Market Renewal Pathfinder

- 2.41 NewHeartlands was one of nine HMR Pathfinders announced by the Government in February 2003, and covers parts of Liverpool, Wirral and Sefton. The HMR initiative involves a long term programme of refurbishment, redevelopment and improved area management to address housing market failure and the associated problems of poor quality housing and a lack of choice and tenure.
- 2.42 Wirral's HMR programme currently covers the following key areas:
- 'Fiveways', Rock Ferry - this area suffers from low demand and an increasing vacancy rate, with many of the properties in a poor condition. The programme in Rock Ferry involves the radical redevelopment of the 'Fiveways' estate.
 - Church Road, Tranmere - the 'Church Road Masterplan' was approved in September 2005 and makes provision for a new shopping centre and new homes.
 - North Birkenhead and Bidston - the programme for this area, which suffers from severe social and economic problems, will include significant clearance and rebuilding of new homes.
 - Wallasey and the Waterfront - the work in this area will complement Peel's Wirral Waters initiative, which will focus on revitalising the dock area, and comprises a range of housing clearance schemes, new build development and upgrading of social rented stock.

Summary

- 2.43 The key points to note from the above review can be summarised as follows:
- The RSS makes provision for 9,000 dwellings in Wirral (net of clearance replacement) over the period 2003 to 2021, equating to an average net gain per annum of 500 dwellings.
 - In July 2008 the Government confirmed 'Mersey Heartlands' as one of 21 second-round New Growth Points. The ambition for the Mersey Heartlands NGP is to achieve a level of housing growth that is 20 per cent greater than the dwelling targets set by the RSS; this equates to a level of housing growth in Wirral of 600 dpa over the period 2008-17, an increase of 100 dpa in relation to the RSS target of 500 dpa.
 - The Council is seeking to focus new housing development towards previously developed land within the HMR and other identified regeneration priority areas. The Council's IPP for new housing development imposes a restriction on residential development on greenfield land and on sites outside the HMR and other identified regeneration priority areas.

3 STUDY METHODOLOGY

Introduction

- 3.1 Our remit in this study differs from our role in other SHLAAs, which we have invariably undertaken from start to finish, because in this case the Council has already undertaken Stages 1 to 7b as set out in the Draft Methodology consulted on by Liverpool City Council in 2009¹⁰. Thus, our specific role has been to:
- critically appraise the Council's work (i.e. Stages 1 to 7b) to enable us to establish and address any issues with the methodology and any gaps in the evidence;
 - assess the 'achievability' of identified sites and identify the actions required to overcome constraints to their delivery (i.e. Stages 7c and 7d), and then to review the entirety of the SHLAA (Stage 8); and
 - depending on the outcome of Stages 1-8, advise on whether there is a need to identify broad locations, and consider the need for a 'windfall' or 'small sites' allowance (i.e. Stages 9 and 10).
- 3.2 In this section of our report we therefore describe the work that the Council undertook in Stages 1-7b, highlighting any refinements to the Council's approach that we suggested, and any additional work that we undertook. We then explain our approach to Stages 7c and 7d of the study. We cover Stages 8-10 in Section 5 of our report, after we have considered whether the assessment sites, together with outstanding planning commitments, are capable of meeting the Borough's dwelling targets.

Stage 1 - Planning the Assessment

- 3.3 As noted above, the Draft Methodology was consulted on in 2009 (between March and May). Only one response of any substance was received (from Peel Holdings). Peel's comments were generally supportive of the proposed methodology and did not suggest any significant revisions to it, which reflects the fact that the methodology is consistent with Figure 3 of the Practice Guidance.
- 3.4 Paragraph 18 of the Practice Guidance states that the study stages should generally be carried out in order, although Stages 3, 4, 6 and 7, and Stages 9 and 10, may be carried out in parallel. In our view, some key tasks - such as identifying the area of search for potential housing sites - should be undertaken at the outset of the study, rather than waiting until later study stages, as recommended by the Guidance and carried through into the agreed methodology. Accordingly, we summarise these key study parameters here under our Stage 1 commentary.

Study Area

- 3.5 Paragraph 7 of the Guidance states that a SHLAA study should '*aim to identify as many sites with housing potential in and around as many settlements as possible in the study*

¹⁰ The Draft Methodology is reproduced in Appendix 1.

area. Accordingly, the Council decided that the study should not be limited to certain areas and that sites would be considered anywhere in the Borough. We endorse the Council's extensive approach to the initial search for sites, which was necessary in order to fully assess the potential to achieve the Council's challenging dwelling targets.

- 3.6 The first plan in Appendix 2 shows that Wirral is an area of relatively high environmental quality, particularly towards the west of the Borough, benefitting from extensive areas of countryside and coastline. Wirral has two Sites of International Importance for Nature Conservation (SIINC) - which incorporate European Sites, Ramsar sites and Special Protection Areas - and 10 nationally designated Sites of Special Scientific Interest (SSSI). The Borough also contains four Areas of Special Landscape Value and several Local Nature Reserves. Furthermore, a significant proportion of Wirral is designated as Green Belt - particularly towards the centre and west of Wirral - and over 40 per cent of the Borough is open countryside, with much of it of high landscape quality.

Study Base Date and Time Horizon

- 3.7 LPAs are required, by paragraph 53 of PPS3, to set out in LDDs their policies and strategies for delivering the level of housing provision prescribed by the approved RSS, or the emerging RSS if the approved RSS is being reviewed. Paragraph 54 of PPS3 states that LPAs should '*identify sufficient specific deliverable sites to deliver housing in the first five years*' from adoption of the relevant LDD. Paragraph 55 further states that LPAs should also '*identify a further supply of specific, developable sites for years 6-10 and, where possible, for years 11-15. Where it is not possible to identify specific sites for years 11-15, broad locations for future growth should be indicated.*'
- 3.8 The requirements of paragraphs 53 to 55 of PPS3 are carried through into the Guidance, paragraph 5 of which requires LPAs to '*identify specific, deliverable sites for the first five years of a plan that are ready for development.*' Paragraph 7 of the Guidance further states that a SHLAA should '*as a minimum...aim to identify sufficient specific sites for at least the first 10 years of a plan, from the anticipated date of its adoption.*'
- 3.9 Both PPS3 and the Guidance require LPAs to identify sites from the date of adoption of the relevant DPD, in this case, the Council's Core Strategy for the Borough.
- 3.10 At the inception meeting, we agreed that 1 April 2008 represented an appropriate study base date because of the base date of the available background information. Accordingly, we have used 1 April 2008 as the starting point in assessing the 5 year land supply, rather than the adoption date of the Core Strategy, and have assessed housing potential for each of the periods 2008-13, 2013-18, and 2018-23. To coincide with the lifetime of the emerging Core Strategy, we have also included a fourth period which runs from 2023-26. The SHLAA will, therefore, need to be rolled forward periodically as the Core Strategy progresses to adoption.
- 3.11 In accordance with the Guidance, the SHLAA should, in any case, be regularly kept up-to-date as part of the Annual Monitoring Report exercise, to support the updating of the housing trajectory and a rolling 5-year supply of specific deliverable sites.

Minimum Site Size Threshold

- 3.12 The Council decided not to use a minimum site size threshold for the SHLAA study. Although we have used a minimum site size threshold in most of the other SHLAA studies that we have undertaken - usually of 0.25 ha or 0.4 ha - we endorse the Council's approach in this instance, given the scale of the dwelling targets and the consequent need to identify as many specific sites as possible¹¹.

Stage 2 - Sources of Potential Housing Sites

- 3.13 PPS3 sets a clear expectation that the supply of land for housing should be based upon specific sites and, where necessary, broad locations. Figures 4 and 5 of the Guidance provide a list of possible sources for identifying potential housing sites. The list includes sites that are already in the planning process as well as sites that are not currently in the planning process. In compiling its initial list of potential housing sites, the Council drew upon the sources listed in Figures 4 and 5.

Stage 3 - Desktop Review of Existing Information

- 3.14 The Council compiled an initial list of potential housing sites using the National Land Use Database, the Council's Employment and Housing Land Databases, a public call for sites exercise, the Wirral Waters Strategic Regeneration Framework and an urban Greenfield sites database. Council officers then removed all duplicates (that is, sites which had been identified from multiple sources). The Council will take account of important policy designations such as Green Belt later in the plan-making process - when it decides which sites to allocate for housing in a site-specific Land Allocations DPD - and so we were asked not to exclude Green Belt sites from the study.
- 3.15 In our assessment, the criteria applied by the Council for the purposes of identifying realistic sites are comprehensive and reasonable.
- 3.16 After removing duplicates the initial list of potential housing sites was reduced to 948. We were supplied with this list towards the end of 2009 and reviewed it using information from various sources and our own follow-up visits to a sample of sites. The list contained just over 200 sites which were under construction at the study base date; we therefore removed these from the list of sites to be assessed afresh in the SHLAA. We also removed 84 sites with planning permission, where construction had not commenced at the study base date¹².
- 3.17 A small number of sites were approaching the end of their planning permission periods, but development had not commenced and intelligence suggested that the permission

¹¹ The Draft Methodology (page 5) states: 'Wirral will only survey sites above a threshold level of 0.4ha.' In actual fact, however, the Council has also surveyed a sample of sites below 0.4 ha.

¹² Outstanding planning permissions have been assessed through separate analysis, as described in Section 4.

would not be implemented. We decided to assess these sites afresh in the same way as other sites which do not have planning permission¹³.

- 3.18 The process described above left 664 sites in the list. We subsequently removed 59 sites which for various reasons had no realistic prospects for housing use, and some small adjoining parcels were combined into larger/more realistic sites. This left 605 sites to be assessed in the SHLAA. Detailed information in relation to the 605 sites is contained in our Microsoft Access sites database, which is described in Appendix 12, and each of the sites is represented as a 'polygon' (i.e. an area with boundaries) on an OS base map in our associated MapInfo GIS. Only about 12 per cent of the sites in the list were greenfield¹⁴.
- 3.19 The contribution to the housing supply of sites with planning permission for residential use at the study base date is assessed through separate analysis, as detailed in Section 4 of our report. These 'committed' sites therefore do not feature in our database, although it is important to note that some of the sites in the database might have been granted planning permission for residential use since the study base date of 1 April 2008. This issue will be addressed through the first update of the study.
- 3.20 As noted above, we were asked not to exclude Green Belt sites so that the Council could properly assess the overall level of housing potential across the Borough. The database therefore includes 94 Green Belt sites. Green Belt is a nationally important policy designation, and development should only take place where there is very strong justification. If sufficient housing supply can be achieved from other sources, then there would be limited (or no) realistic prospect of sites in the Green Belt being released. Accordingly, Green Belt sites are automatically assigned to the lowest Category band (with one or two exceptions as explained below), even if they are not subject to any other constraints.
- 3.21 Annex C to PPG2 does allow the redevelopment of PDL in the Green Belt, but only in the case of identified 'major developed sites', where redevelopment is limited to an area equivalent to the existing built footprint¹⁵. Paragraph C1 of Annex C provides various examples of major developed sites, including factories, collieries and power stations. In addition, UDP Policy GB6 allows 'limited infill development' within the boundaries of the five 'Infill Villages in the Green Belt' designated by UDP Proposal GB7. Some development within these five Infill Villages could therefore also be acceptable in principle.
- 3.22 Details of the Major Developed Sites and the sites within Green Belt Infill Villages - and our approach to these sites - are provided below. Appendix 4 contains further details of our specific approach and assessment criteria.

¹³ For the avoidance of doubt, we can confirm that there is no double-counting because the aforementioned sites were removed from the planning commitments schedule.

¹⁴ Council Officers classified sites either as brownfield or greenfield. It is of course possible that some sites will contain a mix of previously developed and greenfield land, but the Council's assessment is sufficient for the purposes of this strategic study because it is based on the sites' predominant characteristics.

¹⁵ See paragraphs C4 and C5 of Annex C to PPG2.

Major Developed Sites in the Green Belt

- 3.23 The following are identified by UDP Proposal GB9 as Major Developed Sites (MDS) in the Green Belt in Wirral: Arrowe Park Hospital, Clatterbridge Hospital, Thingwall Hospital, Wirral Metropolitan College (Carlett Park Campus), and the Pensby Schools complex. Only two of the SHLAA sites are located within a MDS, namely site ref. 512, which falls within the boundary of the Clatterbridge Hospital MDS, and site ref. 646, which falls within the boundary of the Wirral Metropolitan College (Carlett Park Campus) MDS. For site ref. 646 we have assumed that the amount of development will be limited to the area covered by built footprint within the MDS (as per PPG2), which we estimate to be approximately 30 per cent. We have not reduced the developable area of site ref. 512 because, although it is within a MDS, it is also within Flood Zone 3a which means that it automatically achieves a Category 3 rating; we have therefore treated it in the same way as the other Green Belt sites in the database¹⁶.

Infill Villages in the Green Belt

- 3.24 We were originally supplied with polygons covering the entire villages of Thornton Hough and Raby, which are both designated Infill Villages in the Green Belt. Clearly, it would be a misleading exercise if we were to assess the whole villages as 'sites'. Having liaised with the Council it transpires that design appraisals were undertaken for the two villages as part of the submissions to the UDP Public Inquiry. Although not particularly up to date, the appraisals identify areas with specific potential for development within each of the villages (three in Thornton Hough¹⁷ and two in Raby¹⁸). We therefore created polygons for these five smaller sites and assessed them individually, rather than 'assessing' the entire villages.
- 3.25 Parts of SHLAA sites 867 and 868 are located within an Infill Village at Storeton. As these areas are already developed and the main 'opportunity' is the remaining land outside the Inset Village boundary, we have therefore treated them as normal Green Belt sites (i.e. not within an Infill Village or a Major Developed Site).
- 3.26 Similarly, a tiny fraction of site ref. 860 is within Thornton Hough Infill Village, but we have also treated it as a 'normal' Green Belt site. None of the remaining SHLAA sites are either within, or partially within, an Infill Village.

¹⁶ We have not reduced the developable area of the other Green Belt sites in the database. However, this does not necessarily mean that a greater proportion of each of the 'other' Green Belt sites can be developed. The 'other' Green Belt sites are automatically assigned to the lowest Category band (because they are not within a MDS). Site ref. 646 fares better against the 'Impact on Green Belt' assessment criterion, meaning that it could potentially be placed within the middle Category band.

¹⁷ Site refs. 944, 945 and 946. Note, however, that site 944 falls outside the Infill Village boundary so has been treated as a normal Green Belt site.

¹⁸ Site refs. 947 and 948.

Stage 4 - Determining Which Sites and Areas Will Be Surveyed

3.27 As we explained above, the area of search for potential housing sites was agreed in Stage 1 of the study, which is more logical than waiting until Stage 4 as recommended by the Guidance.

Stage 5 - Carrying Out the Assessment

3.28 The Council recorded site characteristics and various other information for each of the 605 assessment sites through a combination of desk-based research and site visits. We reviewed the Council's data early in the study and suggested ways in which a few small information gaps could be filled. Council officers duly addressed these issues; the final information provided by the Council includes:

- site size in hectares and basic identifier information such as site name/address, ward, and sources/references;
- current land uses both at the site and in the surrounding area;
- the surveyor's assessment of what proportion of the site is available for development, taking account of any on-site permanent features;
- details of any obvious physical constraints in relation to site access, drainage, ground conditions, and so on;
- bad neighbour uses, and the surveyor's assessment of the severity of the constraint;
- details of anything that might affect availability; and
- the surveyor's initial assessment of the site's suitability for housing.

3.29 It is important to emphasise that in a strategic study like this, it is not possible to assess physical constraints, availability and deliverability/viability in particular detail. In assessing sites we have therefore necessarily focused on obvious constraints, taking account of the information supplied by the Council.

3.30 Using the information described above, we subjected all of the sites in the database to a comprehensive assessment against various 'suitability', 'availability' and 'achievability' criteria, as detailed in Appendix 4. The assessment criteria are closely related to the criteria referred to on pages 16 and 17 of the Practice Guidance. Our assessments thus provide a good indication of each site's performance against a broad number of important measures.

3.31 As we explain more fully in Appendix 4, we took account of 'core' suitability constraints in the assessment exercise relating to biodiversity/nature conservation and flood risk¹⁹. This is not to say that the constraint could not be overcome, but the core constraints are likely to delay the site coming forward until such time as it is possible, or worthwhile, to overcome the constraint. Indeed, it might not be necessary for any of the Green Belt sites to be released for housing at all, although this would not become clear until after the

¹⁹ We have reflected the clear sequential approach in PPS25 in our categorisation of sites, and any land within Zone 3b ('the Functional Floodplain', which is not suitable for housing) was excluded from the study on that basis.

potential supply from all non-Green Belt sites had been assessed; we cover this issue in Section 4.

- 3.32 In assessing the availability of sites, we also took account of anything that might affect availability, using known information. Sites held by a developer/willing owner/public sector - for instance, call for sites submissions, and sites being actively marketed - and sites where it is known that pre-application discussions are underway, fared better in the assessment than sites with established multiple uses or where there is thought to be particularly complex/multiple ownership.
- 3.33 Our approach to assessing the 'achievability' of each site is detailed below under Stage 7. Through our assessments of suitability, availability and achievability, each site was placed into one of three 'Category' bands²⁰. The overall categorisation of a site therefore depends on the particular combination of constraints affecting it. The database provides a summary of the reasons explaining why each site has been assigned to a particular Category band. Thus, it is immediately apparent from looking at the database whether a site is affected by particular constraints and, hence, what sort of intervention is likely to be required in order to make the sites deliverable.
- 3.34 Paragraph 36 of PPS3 gives clear priority to housing on PDL rather than on greenfield sites. However, as the target for the use of PDL in the RSS was 80%, the contribution of both may, therefore, be required to meet projected demand in the long-term. We have therefore not made PDL/greenfield status a criterion for categorising sites, but have separately identified the theoretical dwelling yield from each land type to allow us to examine their respective roles in meeting overall dwelling targets.
- 3.35 It will be for the Council to determine the relative merits of the various sites for housing development through preparation of its LDF, in the context of its wider strategic and policy priorities.

Stage 6 - Estimating the Housing Potential of Each Site

- 3.36 In order to assess the number of dwellings that could theoretically be provided at each site, we took account of permanent features, appropriate gross to net ratios²¹ and a 'mixed use ratio' to reflect any non-residential uses that the site is likely to accommodate. Our approach is detailed more fully in Appendix 12, which provides a comprehensive overview of our sites database.
- 3.37 As mentioned earlier in this section, the Borough contains two designated SIINCs and 10 SSSIs. Due to the importance of these designations, any part of a site located within these areas has been ruled out of the SHLAA study. There are also 70 SBIs, four LNRs and 12 SLIES. Some development in these designations may be acceptable (subject to compliance with criteria set out in the UDP) but we nevertheless consider them to be

²⁰ Our definitions match those specified in paragraphs 54 and 55 of PPS3, which are carried through into paragraphs 5 and 33 of the SHLAA Practice Guidance.

²¹ The gross to net ratios are derived from 'Tapping the Potential' (DETR 2000), adapted by RTP to reflect our experience around the country, and the particular characteristics of Wirral.

sensitive areas; accordingly, any sites within these areas have scored poorly against the 'Impact on Nature and Earth Science Conservation' criterion. 'Functional floodplain' is also unsuitable for residential development and so we have not considered any land that is located within Flood Zone 3b.

- 3.38 Having identified the net developable area of each site, we then applied the densities specified in Table 3.1 below. Given the clear shift in favour of family housing, most housebuilders are currently working to approximately 14.5 dwellings per acre, which equates to 36 dph, and so we have applied a rate of 36 dph to sites deemed to be suitable for housing schemes. This is lower than the 51 dph average density that was achieved on residential developments in the Borough between 2005 and 2008 according to the CLG's 'Live Table' No. P232²². However, the 2005-2008 period has been regarded as exceptional and the 36 dph density rate that we have applied is above the minimum required by PPS3, of 30 dph. It is also significantly higher than the average density rates that were achieved across the Borough during the 1997 to 2000 and the 2001 to 2004 periods according to CLG Live Table No. P232, of 29 dph and 32 dph, respectively.
- 3.39 The density rates that we have applied for sites that are suited to apartment schemes or a mix of houses and flats are based on liaison with a wide range of housebuilders and can be regarded as the industry norm. Appendix 5 provides full details of the justification for the specific densities that we have used, but we would make the point that the densities assumed in this study are conservative. With the looming Code for Sustainable Homes (CSH) Level 3 & 4 implications on build cost, and an inability to project much further than 5 years in housing market terms, it may be that higher densities will again be achieved in the future, after the market has recovered. However, our view - which is shared by most commentators - is that the current market will not change materially for 4-5 years and that any assumptions on a greater achievable average density therefore amount to speculation and cannot be relied upon. We would strongly urge the Council to regularly monitor market conditions, which will provide an updated view of the housebuilding industry and potential rises in densities, both in the core areas and in more suburban locations.

Table 3.1 Density Rates Used in the Wirral SHLAA

Site Location Characteristics	Density (dph net)
Identified as appropriate for flats, and located in the HMR	75
Identified as appropriate for flats, and located outside of the HMR area	60
Identified as appropriate for a mix of houses and flats	53
Identified as appropriate for houses	36

- 3.40 The database allows the user to apply various other density rates (from 30 to 70 dph). Whilst we have not applied any of these alternative rates to any of the sites in the

²² Table P232 is available on the CLG's website via the following link:
<http://www.communities.gov.uk/planningandbuilding/planningbuilding/planningstatistics/livetables/landusechange/>

database, we have incorporated this functionality to enable the Council to undertake sensitivity testing, or to update the study using different assumptions.

- 3.41 The housing capacity of the sites in our database was therefore calculated on the following basis:

$$\frac{\text{Gross site area} \times \text{permanent features factor} \times \text{gross to net factor} \times \text{mixed use factor}}{\text{density}}$$

- 3.42 It should be emphasised that in many cases we have specific information with regard to likely yield figures (for example, from masterplans and call for sites submissions). Where this is the case we have reviewed the number of dwellings proposed for the site and - provided the resultant density seems reasonable in the local context - we have used this as the expected site yield, rather than applying the standard density rates described above.
- 3.43 The dwelling yields specified in the database are theoretical and the Council will have to undertake more detailed work on the densities that are achievable at any given site, as and when it is brought forward for development. Nevertheless, we consider that the consistent approach described above is sufficiently robust for the purposes of this strategic study.

Stage 7 - Assessing the Deliverability and Developability of Sites

- 3.44 Predicting when each site is likely to come forward for development is not an exact science. The placing of a site into one of the three Category bands is therefore only intended to give an indication of the likely deliverability and potential timing of a site's development and, hence, its suitability for inclusion as an allocation in the LDF.
- 3.45 The inclusion of a site in a higher Category band should not be taken to represent a recommendation that it should or must be allocated in the LDF, as our categorisation process does not take account of all the policy considerations that are relevant in selecting sites for allocation. Equally, it should not be concluded that a site assigned to a lower Category band cannot come forward earlier, or that it cannot be allocated for development. Rather, it would need to be demonstrated that the site's constraints could be acceptably overcome in order to secure its deliverability.
- 3.46 Under Stage 5 above, we explained how we assessed suitability and availability. Below, we describe the two-stage approach to assessing the 'achievability' of the 608 assessment sites²³ that we devised for this study. The achievability assessments were led by A.P. Sheehan & Co ('APS') informed by our review of the local and national housing market, which is summarised in the Residential Market Commentary Paper (see Appendix 3). The Paper draws upon key themes arising from existing, valuable data sources, our own primary research, and information on the local property market obtained through consultations with local estate agents, developers and housebuilders.

²³ These 608 assessment sites are over and above planning permission sites, which have been assessed through separate analysis, as described in Section 4 of our report.

First Phase Achievability Assessments

3.47 In the first phase, APS carried out a 'high-level' achievability assessment for all of the 194 sites in the SHLAA that are over 0.4 ha in size, as well as a sample of 99 small sites below 0.4 ha. In total APS therefore assessed 293 sites. In order to ensure good geographical coverage of the entire Borough, the sample of 99 small sites included at least eight sites in each of the 11 sub-areas listed on the following page, with the exception of sub-area 2 (which only contains large sites).

Table 3.2 The 99 Small Sites for Which First-Phase Assessments Were Undertaken

	Sub-area											Count Across All Sub-areas
	1	2	3	4	5	6	7	8	9	10	11	
SHLAA Site Refs.	20		88	248	131	339	313	351	13	214	173	
	408		101	268	529	343	626	538	462	426	183	
	454		148	271	532	447	700	632	467	439	207	
	562		170	498	696	629	709	643	468	480	226	
	651		402	682	698	720	710	896	473	490	255	
	656		403	685	702	750	711	918	475	556	485	
	657		515	687	723	816	712	929	571	587	551	
	662		766	797	729	897	714	945	667	591	554	
			890		732	899	935	946	668	595	674	
					796		939	947	669	596		
					829			948	802	617		
									827	909		
	Count	8	0	9	8	11	9	10	11	12	12	

3.48 The 11 sub-areas are based on the eight Settlement Areas which the Council has divided Wirral into for the purposes of its Core Strategy Spatial Options Report. We have further sub-divided Areas 1, 2 and 3 in order to enable the potential housing supply to be separately identified for sites within the HMR Pathfinder area, and for sites outside the HMR Pathfinder area²⁴:

- Area 1 - Wallasey Urban Area (outside the HMR Pathfinder)
- Area 2 - Birkenhead Commercial Area (outside the HMR Pathfinder)
- Area 3 - Birkenhead Urban Area (outside the HMR Pathfinder)
- Area 4 - Bromborough Urban Area
- Area 5 - Mid Wirral Urban Area
- Area 6 - Hoylake-West Kirby Urban Area
- Area 7 - Heswall Urban Area
- Area 8 - Rural Area
- Area 9 - Wallasey Urban Area (within the HMR Pathfinder)
- Area 10 - Birkenhead Commercial Area (within the HMR Pathfinder)
- Area 11 - Birkenhead Urban Area (within the HMR Pathfinder)

3.49 The first-phase assessments do not constitute detailed development appraisals, but did involve consideration of housing market issues at both the macro and micro levels, and other factors which are likely to influence/affect achievability, including known information relating to land values, geo-environmental factors and physical constraints, the effect of varying affordable housing requirements, and so on.

²⁴ Our 11 sampling areas are depicted graphically on the second plan in Appendix 2.

- 3.50 We used the outputs from the achievability assessments - together with our assessments of 'suitability' and 'availability', described above under Stage 5 - to place each of the 293 main assessment sites into one of the three Category bands, as follows:
- Sites which perform well against the suitability, availability and achievability assessments, and are therefore affected by the fewest constraints, are considered to be '**deliverable**' and were therefore placed into Category band 1. It is important to emphasise that for a site to achieve a Category 1 rating, it would need to be suitable, and available (or capable of being made available) within 5 years, and achievable.
 - Sites with a limited level of constraints such that they are likely to be available for delivery after the first five years were placed into Category band 2. These '**developable**' sites may be suitable for development, depending on their individual circumstances and on specific measures being proposed to overcome their constraints.
 - Sites allocated to Category band 3 ('**not currently developable**') have more significant constraints. For these sites to be considered appropriate for development it would have to be clearly demonstrated that the significant constraints affecting them - which could relate to suitability, availability or achievability factors, or a combination thereof - can be mitigated or overcome to make the sites deliverable²⁵.
- 3.51 For budget reasons it was not possible to undertake achievability assessments for the remaining 312 sites. The findings from the 293 achievability assessments were therefore used to extrapolate the theoretical dwelling potential of the remaining sites in each sub-area. For instance, if the achievability assessments showed that 60 per cent of the sites in a particular sub-area achieved an overall Category 1 rating, then we assumed that 60 per cent of the remaining sites in that same sub-area would also be likely to achieve a Category 1 rating. If those sites are collectively capable of accommodating 500 dwellings, then the extrapolation exercise would enable us to identify a theoretical potential of 300 dwellings from the small sites in that sub-area for which an achievability assessment was not undertaken.
- 3.52 APS assessed the achievability of each site under five affordable housing scenarios, in order to demonstrate how different approaches to affordable housing requirements could potentially affect the achievability of sites, and therefore the theoretical dwelling supply. The five 'achievability' scenarios that we considered in this study are listed below; it should be noted that the range of scenarios we tested is not exhaustive, and that in practice other permutations may arise:
- i) Scenario 1: 0 per cent of dwellings to be provided as affordable.
 - ii) Scenario 2: 5 per cent to be provided as affordable.
 - iii) Scenario 3: 15 per cent to be provided as affordable.

²⁵ The exception to this general rule is some large sites, where the likely build-out rates means that a proportion of the expected dwellings will not occur until the third (and in some cases, the fourth) study periods. In these cases the Category 3 rating is a reflection of phasing, rather than 'constraints' in the usual sense, although on the basis of current information we would still not expect these dwellings to come forward within the first 10 years.

- iv) Scenario 4: 25 per cent to be provided as affordable.
 - v) Scenario 5: 40 per cent to be provided as affordable.
- 3.53 The purpose of appraising achievability against various levels of affordable housing delivery is to help the Council to meet the obligations placed upon it by PPS3, namely to assess the proportion of affordable housing that is likely to be economically viable.
- 3.54 There are a number of sites in the HMR Pathfinder area which perform well in the assessments even when providing high levels of affordable housing. This is because APS assumed that if a site falls within the HMR Pathfinder area, it is subject to cleared Government funding which will allow developers to bring the site forward (in all probability to deliver them to RSLs) even at levels of 40 per cent and higher. This is not to say that APS would expect these sites to be deliverable without Pathfinder subsidy.

Second Phase Achievability Assessments

- 3.55 The second phase involved APS undertaking detailed development appraisals for 121 sites. A representative sample was taken across the 11 sub-areas (listed above and shown on the second plan in Appendix 2), ensuring that both greenfield sites and previously developed sites were considered. The sample sites are illustrated in Tables 3.3a and 3.3b. Sites in sub-area 8 (Rural Area) are shown separately because, due to its size, there are more sampled sites from this sub-area than any other.
- 3.56 The tables show, for instance, that 14 sites in sub-area 4 were appraised, of which four were placed into Category band 1, five in Category band 2 (of which one was subsequently removed from the study) and five in Category band 3.

3.57 The two purposes of the second phase development appraisals are to demonstrate that APS's assumptions in the 'first phase' achievability assessments are robust, and to provide the Council with a set of representative 'templates' which can then be used as the basis for detailed assessment of any site as and when required.

3.58 Each of APS's development appraisals consists of a number of very wide Excel spreadsheets which are not possible to reproduce as a discrete report; instead, the 121 completed appraisals have been provided to the Council as free-standing outputs. The content of the appraisals is summarised below together with details of the various inputs and assumptions.

Key assumptions/parameters

3.59 The APS appraisal model assumes that:

- i) there will be a six month lead in period before construction starts;
- ii) planning permission for residential use is already in place, or will be granted;
- iii) sites are serviced, cleared and ready for development;
- iv) construction will proceed at a rate which will enable the sale of at least 2.5 residential dwellings per month; and that
- v) residential sales will commence four months from the construction start date.

3.60 The appraisal model comprises three distinct parts, namely revenue, costs and the return. We describe each part in turn, below.

Revenue

3.61 All revenue figures have been calculated using average comparable evidence for the area based on current conditions, with a certain degree of flexibility for price increases in 1-2 years' time of approximately 5 per cent year on year. We consider that these conditions now can be termed 'normal', as we are no longer exposed to the credit bubble responsible for pushing land and house prices to unsustainable levels. Sales rates have been estimated under 'normal' market conditions, as have investment yields. Such figures have been derived from discussions with developers, housebuilders, estate agents and, where required, investment agents. Affordable housing purchase rates have also been based upon current industry knowledge and have been verified through discussions with various RSLs and housebuilders. For the purposes of this exercise, we have assumed a split of 75 per cent Social Rented and 25 per cent Intermediary Rent, as requested by the Council. Variations around this central theme are investigated and the appraisals demonstrate the effect on land value of changing the proportions of tenure type.

3.62 We have included a notional figure for apartment and house ground rents. In reality these ground rents vary from scheme to scheme, but we have kept ours constant for the purposes of uniformity. Commercial rents have been taken from market evidence.

3.63 With regard to house types, we have assumed standard 650 sq.ft for 2-bed apartments, the most common size developed in the recent past in our experience. We have also taken a standard 450 sq.ft for 1-bed apartments. On the basis of market evidence, we have not assumed any 3-storey town houses, as they will be avoided by most housebuilders for the foreseeable future. We have taken a standard 3-bed house at

950 sq.ft and a 4-bed house at 1,150 sq ft. In reality, these sizes will be altered on a site by site basis, dependant on developer and market demand, but they represent a reasonable current average. Unit densities are based upon current industry acceptance; as the industry has moved away from higher-density schemes, the vast majority of housebuilders are determined to revert to the production of lower density semi-detached and detached schemes at an average of 14.5 units per acre (approximately 36 dwellings per hectare).

- 3.64 For private/market dwellings, sales values have been input at a rate of £165.00 per sq.ft (£1,776.06 per sq.m) for 3-bed properties and similarly for 4-bed dwellings, unless otherwise stated (unit sales rates are amended on a site by site basis dependent upon the site's locality).

Costs

- 3.65 The following development costs and professional fees have been assumed, based on wide-ranging market knowledge and first-hand experience, as well as consultation with both agents and developers:
- i) a residential all-in build cost of £73.00 per sq.ft (£785.77 per sq.m), based on a traditional mode of construction (i.e. non timber framed method) and traditional strip foundations 1m down with ground bearing slabs and no gas precaution measures incorporated;
 - ii) a commercial build cost (typically ground floor retail to shell and core) of £65.00 per sq.ft; and
 - iii) the cost associated with Level 3 of the Code for Sustainable Homes is calculated at £7 per sq.ft over and above the standard build cost. This is also applied to apartments and is based on direct evidence from housebuilders, using recent QS quantum measure across a sample size of various units.
- 3.66 Fees are based upon the accepted current industry norm, as follows:
- i) stamp duty at 4 per cent;
 - ii) agent's fees at 1 per cent, legal fees at 0.5 per cent;
 - iii) VAT on stamp duty - usually associated with brownfield land (17.5 per cent);
 - iv) Section 106 costs, based on 'normal' Wirral Council requirements;
 - v) an assumed gross-to-net ratio of 15 per cent on 3-4 storey apartment schemes and 20 per cent for larger apartment schemes/refurbishments;
 - vi) geo-environmental abnormalities estimated based on industry experience and some knowledge of an individual site's former use. Such costs are only estimates and will undoubtedly be subject to considerable change, upon production of a phase 2 environmental report;
 - vii) at this point no account has been taken of greenfield run off rates for surface water storage, required on the basis that quantum requirements are now being sought irrespective of existing run off;
 - viii) a developer's contingency of 5 per cent on construction costs has been assumed on every site;

- ix) professional fees as a percentage of construction costs and based on current housebuilding industry norms; and
- x) all sale agents' promotion/marketing fees and so on are set to industry norms throughout the appraisals and do not change.

Financial returns

- 3.67 The financial return assumes an interest rate of 7 per cent, a figure which is of a punitive nature and current industry standard. As the economy recovers and interest rates rise, banks will once again be tempted to lend and will become more competitive with their rates. We therefore believe that, because of the two equalising forces, a rate of 7 per cent will remain fairly constant during the short-medium term period.
- 3.68 The appraisals have been calculated to provide a return of 24-25 per cent as a gross margin on revenue. This is seen as the generally accepted industry standard in this part of the economic cycle, but will be one of the inputs which will require updating annually. Gross margin on cost figures are also automatically calculated, as some smaller housebuilders occasionally utilise this figure. Return on capital employed is used by certain housebuilders and is also featured in the appraisals, in order to provide a thorough picture.
- 3.69 The APS development appraisal model enables the user to vary the proportion of affordable housing included within any given scheme and, together with adjustments to the land value, allows a margin of 24-25 per cent to be created. The level of residual land value in relation to alternative use values determines the overall viability of a scheme at differing affordable housing levels and tenures.

How we have used the appraisals

- 3.70 In the vast majority of cases, APS's development appraisals verify the high-level achievability assessments undertaken in the first-phase. In a small number of instances, the development appraisals have resulted in the reclassification of sites between Category bands. Usually, although not exclusively, the direction of travel was downwards. For instance, some sites were assessed as being borderline Category 1 in the first-phase achievability assessments, but the more detailed appraisals showed that the site cannot be considered 'achievable' within the first 5 years, and so these sites have been reclassified as Category 2. Such changes were in the minority, and do not warrant a general downgrading of sites; the most common position was that the initial work was robust and so the default action following the development appraisals was no change to the initial assessment.
- 3.71 The development appraisals have also been valuable in establishing the densities which are likely to be achievable, and assumed yields on some sites have been changed in the light of the findings from the appraisals. A particularly important finding that emerged from the appraisals was that, in most cases, development at over 36 dph on traditional housing sites is not likely to be achievable. This reflects the fact that most housebuilders are looking to develop traditional family homes and the reality that banks are generally reluctant to lend on apartment orientated schemes.

Assessing When Sites are Likely to be Developed

- 3.72 As explained above, our assessments of suitability, availability and achievability enabled us to categorise each of the 293 main assessment sites as 'deliverable', 'developable' or 'not currently developable'²⁶. This information is displayed clearly on the main screen in the sites database.
- 3.73 There are 14 sites in the database which have a theoretical yield of 300+ units (some of these sites are within a larger overall development area, such as SHLAA site refs. 753, 754 and 755 which are part of the Wirral Waters East Float area). At present, the maximum achievable build-out rate for traditional housing sites is around 60 dpa and so for site refs. 631 and 954, which are best suited to traditional housing, we have assumed that it will not be possible to deliver more than 60 units per year.
- 3.74 The remaining 12 sites in the database with a theoretical yield of 300+ units are earmarked to provide apartments, which can be built at a faster rate than traditional housing. The 12 sites are either wholly or largely within the ownership of Peel and so we requested details of the latest phasing plan for each of these sites from Turley Associates, Peel's planning advisor.
- 3.75 Turley Associates supplied the requested phasing details for the 12 sites in a series of emails at the end of January 2010. Given the strategic nature of these 12 sites - and the significant contribution that they could potentially make to Wirral's future housing land supply - we discussed the phasing details at length with Council Officers. We are particularly mindful that the apartment market has been severely hit recently and banks are very reluctant to lend on apartment schemes, and will remain so for the foreseeable future. Details of the various sites are provided below.

Wirral Waters (East Float, Northbank East and Bidston Dock)

- 3.76 The information supplied by Turley Associates indicates that 1,500 residential units can be delivered at Wirral Waters by 2013. We consider this to be very ambitious, particularly given that the outline planning application for the largest area (East Float) was only submitted in December 2009. The timescales involved with securing outline permission and subsequent reserved matters approvals at East Float may be significant, and then there will need to be a construction phase, all of which means that even achieving 900 completions at East Float by 2013 is optimistic. The number of completions at East Float predicted by Turley Associates for the 2013-18 period is also in our view very ambitious.
- 3.77 Council Officers have advised us that whilst they fully appreciate our concerns regarding the supplied phasing details for the large apartment schemes, for the purposes of our SHLAA phasing we should proceed using the figures provided by Turley Associates. This reflects the recent public statements by Peel that it intends to commence development at Wirral Waters in the early part of 2011. Accordingly, the phasing schedule supplied by

²⁶ We are not able to place the remaining 311 assessment sites into one of the three Category bands, because they were not subjected to an achievability assessment.

Turley Associates in relation to the sites at Wirral Waters forms the basis of our Table 3.4 below.

Woodside Redevelopment Area/Rose Brae

- 3.78 The Woodside/Rose Brae site is part owned by Peel and the remainder is in the hands of other landowners including Peach Developments, Merseytravel and Wirral Council. Neptune Developments is currently progressing a masterplan for the site on behalf of all landowners, which follows the Council's earlier masterplan in 2005. As well as residential, the mix of uses is expected to include employment, retail and commercial leisure.
- 3.79 Because of the complex ownership issues and the need to relocate existing uses, delivery cannot be assumed within the first five years and, due to the quantity of units involved, is unlikely to be completed within ten years. Both parts of the site together are expected to provide 1,057 residential units, of which we have assumed that 300 could come forward in the second 5-year period (concentrated on the Rose Brae part of the site) with the remaining 757 units phased for the post-2018 period.

Scott's Quay

- 3.80 Peel owns some of the land within SHLAA site ref. 950 (Scott's Quay), with the remainder in a number of ownerships. The area, which benefits from close proximity to East Float and a strategic location on the Mersey waterfront, is a long term opportunity for masterplanned mixed-use development. The complex ownership situation means that although delivery may commence within the SHLAA period, it is likely to be towards the latter stages. Nevertheless, it is a suitable area for housing, as part of a mixed scheme, and there are no known fundamental barriers to delivery. We therefore consider that an allowance of 500 dwellings within this area should be provided for the post-2018 period. We have discussed and agreed this approach with Turley Associates.

Our assumed phasing of large SHLAA sites

- 3.81 It should be emphasised that Table 3.4 provides only an indication of when the 14 large SHLAA sites might be delivered. It is essential that the SHLAA is monitored each year so that if the sites at Wirral Waters (or any of the other large SHLAA sites) do not proceed at the rate envisaged by Turley Associates/Peel, the SHLAA can be updated accordingly.

Table 3.4 Indicative Phasing of Large SHLAA Sites

Site	SHLAA Ref.	SHLAA Study Period				TOTAL
		First Years (2008-13)	Five Years (2013-18)	Second Five Years (2018-26)	Final Eight Years (2018-26)	
Wirral Waters - East Float	753, 754, 755	900	2,200	3,600	6,700	
Wirral Waters - Birkenhead Dock Estate (Northbank East)	433, 951, 955	400	600	550	1,550	
Wirral Waters - Bidston Dock	415, 952, 953	200	300	240	740	
Woodside Redevelopment Area/Rose Brae	478, 707	0	350	707	1,057	
Seacombe Triangle Regeneration Area (Scott's Quay)	950	0	0	500	500	
Land South of Westgate Road and North of Bromborough Road	631, 954	0	300	135	435	
TOTAL		1,500	3,750	5,732	10,982	

Source: Figures supplied by Turley Associates, January 2010

3.82 There are eight further large 'sites' in the database which are physically capable of accommodating more than 300 dwellings²⁷, as listed below:

- Cammell Lairds (site ref. 442)
- North Pump Lane (site ref. 640)
- Land at Clatterbridge (site ref. 865)
- Greasby Copse (site ref. 879)
- Land at Limbo Lane (site ref. 880)
- Land south of Gills Lane (site ref. 884)
- Land at Woodchurch Road/Landican Lane (site ref. 885)
- Former Solar Campus Playing Fields, Leasowe Road (site ref. 941)

3.83 However, the theoretical yield for each of these sites within the overall period covered by the SHLAA (to 2026) can be no more than 300 dwellings because of the nature of the constraints that they face. The Cammell Lairds site is a large area of vacant dockland in an industrial area and is likely to have only long-term potential. The remaining seven sites are all within the Green Belt and so they have automatically been assigned to Category 3. As we explained earlier in this section, it might not be necessary for any of these large Green Belt sites to be released for housing at all, although this would not become clear until after the potential supply from all non-Green Belt sites had been assessed (we cover this issue later in our report).

²⁷ These eight 'sites' range in size from approximately 17 ha to 42 ha.

4 STUDY FINDINGS

Introduction

- 4.1 In this section we provide the results from the study and assess whether, and how, the RSS dwelling targets can be achieved. We also assess whether the ambition for a higher level of growth under the Growth Point initiative can be achieved. In summary, our approach is to:
- identify the 5, 10, 15 and 18-year dwelling targets, taking account of any under-provision against the RSS dwelling targets since the RSS base date of 1 April 2003, and allowing for planned future demolitions;
 - identify the supply from housing commitments;
 - establish the potential supply from Category 1 ('deliverable'), Category 2 ('developable') and Category 3 ('not currently developable') sites; and
 - assess whether the identified supply from outstanding planning commitments and the further, specific sites that we have assessed in the SHLAA is sufficient to meet the 5, 10, 15 and 18-year dwelling targets.

Dwelling Targets

Consideration of Under-Provision Against the RSS Dwelling Targets Since 1 April 2003 (the RSS Base Date)

- 4.2 It is necessary to take account of any under-provision against the RSS dwelling targets since the RSS base date of 1 April 2003. This is because paragraph 5(i) of the CLG's advice note entitled 'Demonstrating a 5 Year Supply of Deliverable Sites' (12 April 2007)²⁸ states that in order to identify the level of housing provision to be delivered over the following 5 years, LPAs should use provision figures in adopted development plans, '*adjusted to reflect the level of housing that has already been delivered.*'
- 4.3 Table 7.1 of the adopted RSS sets a target for Wirral of 9,000 dwellings (net of clearance replacement) for the period 2003 to 2021, equating to an average net gain per annum of 500 dwellings. Completions data and clearance figures supplied by the Council show that 1,786 net additional dwellings were delivered across Wirral between 1 April 2003 and 31 March 2008. This translates to a shortfall of 714 dwellings compared to the RSS target, as shown in Table 4.1 below.

²⁸ http://www.planning-inspectorate.gov.uk/pins/advice_for_insp/advice_produced_by_dclg.htm

Table 4.1 Under-provision Against the RSS Dwelling Targets Between the Base Date of the Adopted RSS (1 April 2003) and the SHLAA Base Date (1 April 2008)

Year	Gross Dwg Completions(incl. conversions and changes of use)	Total Demolitions/ Losses through conversions and changes of use	Net Dwg Completions	RSS Dwgs/Yr Target	Shortfall Against the RSS Dwgs/yr Target
2003-04	686	243	443	500	-57
2004-05	531	429	102	500	-398
2005-06	511	291	220	500	-280
2006-07	736	230	506	500	6
2007-08	771	256	515	500	15
Total	3,235	1,449	1,786	9,000	-714

Note: Negative figures in the right-hand column indicate a shortfall against the RSS targets, whereas positive figures denote that the target was achieved.

4.4 Given prevailing market conditions, we do not consider it appropriate or realistic to apportion the shortfall of 714 dwellings wholly to the first five-year study period. Through discussion with Council officers it was therefore agreed that we would apportion the shortfall equally across the remaining 13 years of the RSS plan period, as follows:

- 275 dwellings allocated to the 2008-13 period: $(714/13)*5$
- 275 dwellings allocated to the 2013-18 period: $(714/13)*5$
- 164 dwellings allocated to the 2018-21 period: $(714/13)*3$
- TOTAL: 714 dwellings allocated to the 2008-21 period

Planned Future Demolitions

4.5 The Council advised that the following demolitions are anticipated for the 5, 10, 15 and 18-year SHLAA study periods. These figures comprise planned demolitions over the SHLAA study period, together with an allowance based on past trends:

Table 4.2 Anticipated Demolitions

Study Period	Planned/Likely Demolitions
2008-2013	1,026
2013-2018	688
2018-2023	615
2023-2026	369
Overall 2008-26 Study Timeframe	2,698

Data from Wirral Council's Annual Monitoring Report 2009.

Dwelling Targets, Reflecting Under-Provision Since 2003 and Allowing for Likely Future Demolitions

4.6 The RSS sets a target of 500 net additional dpa in Wirral. The ambition for the Mersey Heartlands New Growth Point (NGP) is to achieve a level of housing growth that is 20 per cent greater than the dwelling targets set by the RSS over the period 2008-17. Thus, the NGP-based target for Wirral is 600 net additional dpa between 2008 and 2017.

- 4.7 The Borough-wide dwelling targets for each study period - taking account of under-provision between 2003 and 2008 as well as planned demolitions, apportioned equally across the remaining 13 years of the RSS plan period - are therefore set out in Table 4.3 ('RSS Scenario') and Table 4.4 ('RSS+NGP Scenario').

Table 4.3 Dwelling Targets ('RSS Scenario')

2008-13				
Raw Dwg Target	Allowance for Under-Provision Since 2003	Allowance for Demolitions	Adjusted 5-Year Dwg Target	Cumulative 5-year Dwg Target
2,500	275	1,026	3,801	3,801
2013-18				
Raw Dwg Target	Allowance for Under-Provision Since 2003	Allowance for Demolitions	Adjusted 5-Year Dwg Target	Cumulative 10-year Dwg Target
2,500	275	688	3,463	7,264
2018-23				
Raw Dwg Target	Allowance for Under-Provision Since 2003	Allowance for Demolitions	Adjusted 5-Year Dwg Target	Cumulative 15-year Dwg Target
2,500	164	615	3,279	10,543
2023-26				
Raw Dwg Target	Allowance for Under-Provision Since 2003	Allowance for Demolitions	Adjusted 5-Year Dwg Target	Cumulative 18-year Dwg Target
1,500	0	369	1,869	12,412
* The figures in the table are based on the target set by the approved RSS of 500 net additional dwellings per annum in Wirral over the period 2003-21; we have assumed that the annual target will continue until the end of the Core Strategy (i.e. 2026).				
*** Between 2003 and 2008, there was an under-provision against the RSS dwelling targets of 714 dwellings. It was agreed with Council officers that this shortfall would be apportioned equally across the remaining 13 years of the RSS plan period.				

Table 4.4 Dwelling Targets ('RSS+NGP Scenario')

2008-13				
Raw Dwg Target	Allowance for Under-Provision Since 2003	Allowance for Demolitions	Adjusted 5-Year Dwg Target	Cumulative 5-year Dwg Target
3,000	275	1,026	4,301	4,301
2013-18				
Raw Dwg Target	Allowance for Under-Provision Since 2003	Allowance for Demolitions	Adjusted 5-Year Dwg Target	Cumulative 10-year Dwg Target
2,900	275	688	3,863	8,164
2018-23				
Raw Dwg Target	Allowance for Under-Provision Since 2003	Allowance for Demolitions	Adjusted 5-Year Dwg Target	Cumulative 15-year Dwg Target
2,500	164	615	3,279	11,443
2023-26				
Raw Dwg Target	Allowance for Under-Provision Since 2003	Allowance for Demolitions	Adjusted 5-Year Dwg Target	Cumulative 18-year Dwg Target
1,500	0	369	1,869	13,312
* The figures in the table are based on the New Growth Point target for Wirral of 600 dpa in the period 2008-17, and the target set by the approved RSS of 500 dpa in the remaining years (we have assumed that the annual RSS target will continue until the end of the Core Strategy i.e. 2026).				
*** Between 2003 and 2008, there was an under-provision against the RSS dwelling targets of 714 dwellings. It was agreed with Council officers that this shortfall would be apportioned equally across the remaining 13 years of the RSS plan period.				

- 4.8 The figures contained in the fourth column of Tables 4.3 and 4.4 are those that we work to when assessing whether there are sufficient deliverable and developable sites to meet the Borough's dwelling targets. In summary, under the 'RSS Scenario', 12,412 additional dwellings will have to be provided across the Borough over the next 18 years, after allowing for the under-provision against the RSS dwelling targets between 2003 and 2008, and for planned/likely demolitions. The 18-year target rises to 13,312 dwellings under the 'RSS+NGP Scenario'.

Supply from Housing Commitments

What Are Housing Commitments?

- 4.9 Housing 'commitments' comprise dwellings with full or outline planning permission. Because the latest comprehensive data on residential commitments supplied by the Council relate to a base date of 1 April 2008, some of the permissions at the study's base date may now be partly or fully completed. This is unavoidable and can be dealt with when the study is updated.
- 4.10 As we explained in Section 3, the maximum achievable build-out rate for traditional housing sites is currently around 60 dpa. Apartments can be built at a faster rate than traditional housing and so for these sites the expected rate of delivery is greater, but for most sites it can be assumed that it will not be possible to deliver more than 60 units per year. If there were any permissions where more than 300 dwellings had not been started or completed at the study base date, care would need to be taken because

implementation of these permissions may potentially extend beyond five years. Housing production on such sites would have to be carefully monitored and sufficient appropriate allocations would need to be included in the LDF to allow for the possibility that they may not generate their full supply within the first five years.

- 4.11 However, commitments data supplied by the Council show that there were no sites with more than 300 dwellings outstanding at the study base date. The largest individual permission is for 233 dwellings at Church Road, Tranmere²⁹. Accordingly, we do not consider it necessary to phase any of the commitments over a longer time period.
- 4.12 It is reasonable to assume that not all of the commitments in the schedule will be implemented and so we consider that there is a need to apply a non-implementation rate (any failure of specific commitments to be taken up can be dealt with through routine monitoring and supply management). We deal with this issue, below.

All Housing Commitments at the Study Base Date

- 4.13 The Council's schedule of outstanding commitments showed that in total there was extant permission for 3,864 dwellings on 538 sites across the Borough at the study base date. These dwellings were either un-commenced or started but not completed at the study base date, and could therefore potentially form part of the Borough's future housing supply. We assume that the number of dwellings built will be as given in the latest permission, although it is possible that these will be superseded by further approvals on the same sites.

Allowance for Non-Implementation of Housing Commitments

- 4.14 It is reasonable to assume that not all of the commitments will be delivered, particularly given the current downturn in the market. To ensure a robust approach we consider that there is a need to make an allowance for non-implementation of a proportion of the outstanding residential planning permissions. Applying a 'non-implementation rate' will ensure that the Borough's housing supply is not over-reliant on extant planning permissions, which may not all progress in practice.
- 4.15 To inform the Liverpool SHLAA, the City Council undertook an extensive consultation exercise with land owners, developers and other interested parties, in order to ascertain the realistic supply from outstanding housing commitments (i.e. those which are likely to be implemented in accordance with the planning permission).
- 4.16 Wirral Council undertook a parallel consultation exercise in the early part of 2009. However, the resultant information, was less detailed and comprehensive than in Liverpool, and so we were unable to categorise the commitments in the same way. Given that we were unable to robustly identify which of the outstanding commitments in Wirral were 'unlikely' to be implemented - and therefore reassess them afresh in the SHLAA - we did not consider it appropriate to reduce the number of outstanding commitments by 26 per cent in Wirral.

²⁹ Ref. W/OUT/07/6066.

4.17 Accordingly, it was agreed that we would apply a 20 per cent non-implementation rate to the 3,864 outstanding commitments at the study base date (comprising both full and outline planning permissions). After applying the 20 per cent non-implementation rate, the total realistic supply from outstanding commitments in Wirral stands at 3,091 dwellings. Future updates of the SHLAA will provide an opportunity to update the number of outstanding residential commitments.

Theoretical Dwelling Supply from the SHLAA Sites

4.18 We have identified the theoretical dwelling supply from the SHLAA sites under each of the five achievability scenarios described in Section 3. We did the exercise twice, firstly by including all of the Green Belt sites in the figures and, secondly, by only including sites that are not within the Green Belt.

4.19 The purpose of doing the exercise twice is to provide the Council with as much evidence as possible. However, as we have emphasised, Green Belt is a nationally important policy designation and development there should only take place where there is very strong justification. Accordingly, for the purposes of this report, we consider it more helpful to focus on the theoretical supply from the sites that are not in the Green Belt. For information purposes, the tables in Appendix 13 specify the theoretical dwelling supply from all sites, including those in the Green Belt, and the tables in Appendix 14 show how the Borough's dwelling targets could be achieved if all sites including those in the Green Belt were to be used.

4.20 Below, we provide three tables for each achievability scenario, focusing on sites outside of the Green Belt. The tables contain the following information:

- The first table details the number of sites assigned to Category bands 1-3 and their potential combined dwelling yield, focusing on the 216 sites outside of the Green Belt for which an achievability assessment was undertaken. The yield from each Category band is further classified as greenfield or PDL³⁰.
- The second table identifies the dwelling supply from sites in the three broad spatial areas defined by the RSS and reproduced as Picture 3.1 of the Core Strategy Spatial Options Report, which form the basis of the options for the distribution of new dwellings put forward in Section 6 of the same document:
 1. the 'RSS Inner Area', which equates to the part of the NewHeartlands HMR Pathfinder in Wirral;
 2. the 'RSS Outer Area', which is defined as the remaining urban area to the east of the M53 motorway; and
 3. the 'RSS Rural Area', which is defined as the areas to the west of the M53 motorway.

³⁰ Some sites contain a mix of greenfield and previously developed land. In these cases we have classified the site according to its predominant characteristic.

- The third table identifies the dwelling yield from the 301 small sites outside of the Green Belt for which an achievability assessment was not undertaken, again broken down by Category band³¹, with the supply from the three sub-areas of the Borough identified separately.

4.21 The 15 tables in summary show that:

- The 216 sites for which an achievability assessment was undertaken could potentially yield around 17,970 dwellings (about 95 per cent of the total from the 517 assessment sites that are located outside of the Green Belt).
- The remaining 301 small sites could potentially yield around 960 dwellings (5 per cent of the total from the 517 assessment sites outside of the Green Belt). The 301 small sites therefore contribute a very small proportion of the Borough's theoretical housing supply even though in numerical terms they represent almost two-thirds of the sites that we considered.
- The potential from the 517 SHLAA sites outside of the Green Belt is therefore around 18,940 dwellings. Of these, just under 70 per cent (approximately 13,000 dwellings) are within the Inner Area.
- Just under 85 per cent of the yield from the 216 assessment sites outside of the Green Belt is on PDL.

4.22 The 15 tables are provided below. To reiterate, the figures in the tables relate only to those sites that are located outside of the Green Belt.

Achievability Scenario 1 - Affordable Housing at 0%

Table 4.6a Theoretical Dwelling Yield from Categorized Sites in Wirral - Achievability Scenario 1

	Total		PDL		GF	
	Dwgs	No. Sites	Dwgs	No. Sites	Dwgs	No. Sites
Category 1 sites	2,702	78	2,259	51	443	27
Category 2 sites	5,555	44	5,233	31	322	13
Category 3 sites	9,717	94	8,727	65	990	29
TOTAL	17,974	216	16,219	147	1,755	69

Table 4.6b Theoretical Dwelling Yield from Categorized Sites in Wirral by Area - Achievability Scenario 1

	Inner Area		Outer Area		Rural Area		Total	
	Dwgs	No. Sites	Dwgs	No. Sites	Dwgs	No. Sites	Dwgs	No. Sites
Category 1 sites	1,696	24	778	30	228	24	2,702	78
Category 2 sites	4,056	15	1,155	13	344	16	5,555	44
Category 3 sites	7,229	44	1,508	30	980	20	9,717	94
TOTAL	12,981	83	3,441	73	1,552	60	17,974	216

³¹ An achievability assessment was not undertaken for these sites, and so we are not able to place them into one of the three Category bands. However, the extrapolation exercise described in Section 3 enables us to identify the theoretical dwelling potential from sites in each sub-area.

Table 4.6c Theoretical Dwelling Yield from the Remaining Small Sites in Wirral by Area - Achievability Scenario 1

	Inner Area	Outer Area	Rural Area	Total
	Dwgs	Dwgs	Dwgs	Dwgs
Category 1 sites	87	131	95	313
Category 2 sites	66	58	52	176
Category 3 sites	233	180	60	473
TOTAL	386	369	207	962

Achievability Scenario 2 - Affordable Housing at 5%

Table 4.7a Theoretical Dwelling Yield from Categorized Sites in Wirral - Achievability Scenario 2

	Total		PDL		GF	
	Dwgs	No. Sites	Dwgs	No. Sites	Dwgs	No. Sites
Category 1 sites	2,694	77	2,259	51	435	26
Category 2 sites	5,555	44	5,233	31	322	13
Category 3 sites	9,725	95	8,727	65	998	30
TOTAL	17,974	216	16,219	147	1,755	69

Table 4.7b Theoretical Dwelling Yield from Categorized Sites in Wirral by Area - Achievability Scenario 2

	Inner Area		Outer Area		Rural Area		Total	
	Dwgs	No. Sites	Dwgs	No. Sites	Dwgs	No. Sites	Dwgs	No. Sites
Category 1 sites	1,696	24	770	29	228	24	2,694	77
Category 2 sites	4,056	15	1,155	13	344	16	5,555	44
Category 3 sites	7,229	44	1,516	31	980	20	9,725	95
TOTAL	12,981	83	3,441	73	1,552	60	17,974	216

Table 4.7c Theoretical Dwelling Yield from the Remaining Small Sites in Wirral by Area - Achievability Scenario 2

	Inner Area	Outer Area	Rural Area	Total
	Dwgs	Dwgs	Dwgs	Dwgs
Category 1 sites	87	118	95	300
Category 2 sites	66	50	49	165
Category 3 sites	233	201	63	497
TOTAL	386	369	207	962

Achievability Scenario 3 - Affordable Housing at 15%

Table 4.8a Theoretical Dwelling Yield from Categorized Sites in Wirral - Achievability Scenario 3

	Total		PDL		GF	
	Dwgs	No. Sites	Dwgs	No. Sites	Dwgs	No. Sites
Category 1 sites	2,655	76	2,220	50	435	26
Category 2 sites	5,594	45	5,272	32	322	13
Category 3 sites	9,725	95	8,727	65	998	30
TOTAL	17,974	216	16,219	147	1,755	69

Table 4.8b Theoretical Dwelling Yield from Categorised Sites in Wirral by Area - Achievability Scenario 3

	Inner Area		Outer Area		Rural Area		Total	
	Dwgs	No. Sites	Dwgs	No. Sites	Dwgs	No. Sites	Dwgs	No. Sites
Category 1 sites	1,657	23	770	29	228	24	2,655	76
Category 2 sites	4,095	16	1,155	13	344	16	5,594	45
Category 3 sites	7,229	44	1,516	31	980	20	9,725	95
TOTAL	12,981	83	3,441	73	1,552	60	17,974	216

Table 4.8c Theoretical Dwelling Yield from the Remaining Small Sites in Wirral by Area - Achievability Scenario 3

	Inner Area	Outer Area	Rural Area	Total
	Dwgs	Dwgs	Dwgs	Dwgs
Category 1 sites	87	118	95	300
Category 2 sites	66	50	49	165
Category 3 sites	233	201	63	497
TOTAL	386	369	207	962

Achievability Scenario 4 - Affordable Housing at 25%

Table 4.9a Theoretical Dwelling Yield from Categorised Sites in Wirral - Achievability Scenario 4

	Total		PDL		GF	
	Dwgs	No. Sites	Dwgs	No. Sites	Dwgs	No. Sites
Category 1 sites	2,655	76	2,220	50	435	26
Category 2 sites	5,080	40	4,758	27	322	13
Category 3 sites	10,239	100	9,241	70	998	30
TOTAL	17,974	216	16,219	147	1,755	69

Table 4.9b Theoretical Dwelling Yield from Categorised Sites in Wirral by Area - Achievability Scenario 4

	Inner Area		Outer Area		Rural Area		Total	
	Dwgs	No. Sites	Dwgs	No. Sites	Dwgs	No. Sites	Dwgs	No. Sites
Category 1 sites	1,657	23	770	29	228	24	2,655	76
Category 2 sites	3,581	11	1,155	13	344	16	5,080	40
Category 3 sites	7,743	49	1,516	31	980	20	10,239	100
TOTAL	12,981	83	3,441	73	1,552	60	17,974	216

Table 4.9c Theoretical Dwelling Yield from the Remaining Small Sites in Wirral by Area - Achievability Scenario 4

	Inner Area	Outer Area	Rural Area	Total
	Dwgs	Dwgs	Dwgs	Dwgs
Category 1 sites	87	118	95	300
Category 2 sites	66	50	49	165
Category 3 sites	233	201	63	497
TOTAL	386	369	207	962

Achievability Scenario 5 - Affordable Housing at 40%

Table 4.10a Theoretical Dwelling Yield from Categorised Sites in Wirral - Achievability Scenario 5

	Total		PDL		GF	
	Dwgs	No. Sites	Dwgs	No. Sites	Dwgs	No. Sites
Category 1 sites	2,582	73	2,161	48	421	25
Category 2 sites	4,753	38	4,431	25	322	13
Category 3 sites	10,639	105	9,627	74	1,012	31
TOTAL	17,974	216	16,219	147	1,755	69

Table 4.10b Theoretical Dwelling Yield from Categorised Sites in Wirral by Area - Achievability Scenario 5

	Inner Area		Outer Area		Rural Area		Total	
	Dwgs	No. Sites	Dwgs	No. Sites	Dwgs	No. Sites	Dwgs	No. Sites
Category 1 sites	1,657	23	711	27	214	23	2,582	73
Category 2 sites	3,195	7	1,214	15	344	16	4,753	38
Category 3 sites	8,129	53	1,516	31	994	21	10,639	105
TOTAL	12,981	83	3,441	73	1,552	60	17,974	216

Table 4.10c Theoretical Dwelling Yield from the Remaining Small Sites in Wirral by Area - Achievability Scenario 5

	Inner Area	Outer Area	Rural Area	Total
	Dwgs	Dwgs	Dwgs	Dwgs
Category 1 sites	87	118	80	285
Category 2 sites	66	50	49	165
Category 3 sites	233	201	78	512
TOTAL	386	369	207	962

Categorisation Schedules and Plans

- 4.23 The categorisation schedules in Appendices 6, 7 and 8 specify the Category rating (1, 2 or 3) for all of the sites that were subjected to an achievability assessment (that is, the 293 main assessment sites, including sites within and outside of the Green Belt). For reasons of brevity we have focused on achievability scenario 5 (affordable housing at 40 per cent). The schedules also provide the following summary information for each site: brief address details; the gross site area; and the theoretical dwelling yield (after allowance has been made for any site-specific permanent features).
- 4.24 Appendix 9 contains schedules for the 312 remaining small sites (11 of these sites fall within the Green Belt so while they are listed in Appendix 9 they are not considered in Tables 4.6a to 4.10c). Although we are not able to place these 312 sites into one of the three Category bands (because they were not subjected to an achievability assessment, due to budget limitations), we are still able to identify their location, the gross site area, and the theoretical dwelling yield after allowance for any site-specific permanent features.
- 4.25 The plans in Appendix 10 show, in schematic terms, the spatial distribution of the 293 Category 1, Category 2 and Category 3 sites under each of the five achievability

scenarios. All of the sites within the Green Belt are automatically assigned to the lowest Category band. Nevertheless, as we have repeatedly emphasised, Green Belt is a nationally important policy designation and so development of Green Belt land for housing should only occur when there are very special circumstances. Accordingly, Appendix 11 contains the same set of plans but this time without any of the Green Belt sites shown. The plans in Appendix 11 relate to Tables 4.6a to 4.10c above, and are therefore probably more useful in illustrating the realistic distribution of possible housing sites across the Borough.

Adequacy of Housing Provision

Introduction

- 4.26 The 15 tables above show the theoretical dwelling yields under each of the five achievability scenarios (focusing on those sites that are located outside of the Green Belt). In the ten tables below we assess whether the Borough-wide dwelling targets can be achieved through a combination of the 517 SHLAA sites that are not in the Green Belt, together with outstanding planning commitments.
- 4.27 There are two tables for each achievability scenario. The first table shows whether the RSS-based dwelling targets can be achieved, and the second assesses whether the higher 'RSS+NGP' based targets can be reached.
- 4.28 As we explained in Section 2, Table 6.1 of the Core Strategy Spatial Options Report puts forward four possible options for the distribution of new dwellings. However, for the purposes of the SHLAA, we have worked to the Borough-wide dwelling targets rather than attempting to apportion the growth to the various sub-areas on the basis of distributions that have not yet been agreed.

Approach

- 4.29 The components of potential housing supply, as set out in the tables below, are referenced as follows:
- PP = dwellings still to be completed at 1 April 2008 with outstanding planning permission at that date (having stripped out those commitments which are not likely to be implemented, as described earlier in this section);
 - C1, C2, C3 = potential from the 216 main assessment sites (non-Green Belt) in Category bands 1, 2 and 3 respectively; and
 - SS1, SS2, SS3 and SS4 = potential from the remaining 301 small sites (non-Green Belt), labelled 'SS1' for the supply which we would expect to come forward in the first five years (2008-13), 'SS2' for the supply which we would expect to come forward in the first 10 years (2008-18), 'SS3' for the supply which we would expect to come forward in the first 15 years (2008-23), and 'SS4' for the supply which we would expect to come forward in the overall 2008-26 study period.
- 4.30 As there is no definitive 'answer', within each period the yield from a combination of components is compared with the dwelling target for the period. Where a combination is sufficient to meet the target, the yield and the number of additional identified sites which

make up the yield is highlighted in green. Otherwise the yield and number of sites are left without colour. It is therefore immediately apparent to what extent the potential housing supply for a period is sufficient to meet the target. This approach is adopted for both the total yield and the yield on PDL.

- 4.31 Our site categorisation does not take account of all the policy considerations that are relevant in selecting sites for allocation, which are likely to include the broad sustainability of the total development pattern, impact on biodiversity and landscape, and strategic transport and other infrastructure capacity issues. Thus, we have not undertaken any analysis to consider whether the Category 1 supply is in the right place to meet strategic policy objectives. Similarly, we have not considered whether it would be better to remove the obstacles affecting Category 2 PDL and bring these sites forward in advance of Category 1 greenfield sites. These issues are beyond the scope of a SHLAA and will need to be considered through the LDF preparation process.

Summary of Findings

- 4.32 The headline findings can be summarised as follows:
- Under four of the five 'RSS-based' scenarios, the 18-year targets can be achieved without having to rely on the more significantly constrained Category 3 sites. Some Category 3 sites would be needed in order to meet the 18-year RSS-based dwelling targets under Scenario 5.
 - Conversely, under the more challenging 'RSS+NGP' dwelling targets, some Category 3 sites would be needed under all five achievability scenarios.
 - The potential supply from the 517 SHLAA sites outside the Green Belt, together with outstanding planning permissions, is around 22,000 dwellings. The 'headroom' is therefore more than 8,700 dwellings in relation to the 18-year 'RSS+NGP' based target of 13,312 net additional dwellings, and the headroom in relation to the 18-year RSS-based target of 12,412 dwellings is therefore approximately 9,600 dwellings.
- 4.33 It is important to emphasise that almost half of the Borough's theoretical supply (just under 11,000 dwellings) is derived from the 14 'large' sites that are specified in Table 3.4 of our report. In particular, using the figures supplied by Turley Associates, East Float is forecast to contribute 6,700 dwellings by 2026, with Wirral Waters as a whole predicted to deliver around 9,000 units.
- 4.34 For the reasons that we set out in Section 3, we consider the delivery figures supplied by Turley Associates for Wirral Waters to be very ambitious. It is therefore imperative that the SHLAA is monitored each year so that if the sites at Wirral Waters (or any of the other large SHLAA sites) do not proceed at the rate envisaged by Turley Associates/Peel, the SHLAA can be updated accordingly.
- 4.35 The ten tables are provided below. Again, for the avoidance of doubt, the figures in the tables relate only to those sites that are located outside of the Green Belt. Appendix 14 contains the tables covering all sites including those within the Green Belt although, as we have explained, this is solely for information purposes and we are not necessarily advocating the release of any Green Belt land.

Table 4.11a Adequacy of Cumulative Housing Potential in Wirral, Forthcoming 5, 10, 15 and 18-Year Periods (Achievability Scenario 1), RSS-BASED TARGETS

Period	Component	Total		PDL	
		Yield	Additional Sites	Yield	Additional Sites
First 5 years	PP	3,091	0	3,091	0
	PP+SS1	3,404	0	3,404	0
	PP+SS1+C1	6,106	78	5,663	51
	PP+SS1+C1+C2	11,661	122	10,896	82
	PP+SS1+C1+C2+C3	21,378	216	19,623	147
	Dwelling Requirement	3,801		3,801	
First 10 years	PP	3,091	0	3,091	0
	PP+SS2	3,580	0	3,580	0
	PP+SS2+C1	6,282	78	5,839	51
	PP+SS2+C1+C2	11,837	122	11,072	82
	PP+SS2+ C1+C2+C3	21,554	216	19,799	147
	Dwelling Requirement	7,264		7,264	
First 15 years	PP	3,091	0	3,091	0
	PP+SS3	4,053	0	4,053	0
	PP+SS3+C1	6,755	78	6,312	51
	PP+SS3+C1+C2	12,310	122	11,545	82
	PP+SS3+C1+C2+C3	22,027	216	20,272	147
	Dwelling Requirement	10,543		10,543	
First 18 years	PP	3,091	0	3,091	0
	PP+SS4	4,053	0	4,053	0
	PP+SS4+C1	6,755	78	6,312	51
	PP+SS4+C1+C2	12,310	122	11,545	82
	PP+SS4+C1+C2+C3	22,027	216	20,272	147
	Dwelling Requirement	12,412		12,412	

Notes:

* 'Additional' = sites additional to those with planning permission

**PDL yield includes dwellings from planning permissions on greenfield land as well as PDL sites, as these greenfield sites will also contribute to the dwelling requirements even if all other future development were to be on PDL sites.

*** The 'Dwelling Requirement' figures in the table are based on the target set by the approved RSS of 500 net additional dwellings in Wirral over the period 2003-21; we have assumed that the annual target will continue until the end of the emerging Core Strategy (2026). These figures also incorporate an allowance for under-provision against the RSS requirements which arose between the base date of the RSS (1 April 2003) and the SHLAA study base date (1 April 2008), and take account of planned demolitions - please refer to Tables 4.2 to 4.4 for further details.

Table 4.11b Adequacy of Cumulative Housing Potential in Wirral, Forthcoming 5, 10, 15 and 18-Year Periods (Achievability Scenario 1), RSS+NGP BASED TARGETS

Period	Component	Total		PDL	
		Yield	Additional Sites	Yield	Additional Sites
First 5 years	PP	3,091	0	3,091	0
	PP+SS1	3,404	0	3,404	0
	PP+SS1+C1	6,106	78	5,663	51
	PP+SS1+C1+C2	11,661	122	10,896	82
	PP+SS1+C1+C2+C3	21,378	216	19,623	147
	Dwelling Requirement	4,301		4,301	
First 10 years	PP	3,091	0	3,091	0
	PP+SS2	3,580	0	3,580	0
	PP+SS2+C1	6,282	78	5,839	51
	PP+SS2+C1+C2	11,837	122	11,072	82
	PP+SS2+ C1+C2+C3	21,554	216	19,799	147
	Dwelling Requirement	8,164		8,164	
First 15 years	PP	3,091	0	3,091	0
	PP+SS3	4,053	0	4,053	0
	PP+SS3+C1	6,755	78	6,312	51
	PP+SS3+C1+C2	12,310	122	11,545	82
	PP+SS3+C1+C2+C3	22,027	216	20,272	147
	Dwelling Requirement	11,443		11,443	
First 18 years	PP	3,091	0	3,091	0
	PP+SS4	4,053	0	4,053	0
	PP+SS4+C1	6,755	78	6,312	51
	PP+SS4+C1+C2	12,310	122	11,545	82
	PP+SS4+C1+C2+C3	22,027	216	20,272	147
	Dwelling Requirement	13,312		13,312	

Notes:

* 'Additional' = sites additional to those with planning permission

** PDL yield includes dwellings from planning permissions on greenfield land as well as PDL sites, as these greenfield sites will also contribute to the dwelling requirements even if all other future development were to be on PDL sites.

*** The 'Dwelling Requirement' figures in the 'RSS+NGP' table are higher than the corresponding figures in the 'RSS' table because they reflect the higher dwelling targets for Wirral over the 2008-17 period. We have assumed that the annual RSS-based dwelling target of 500 net additional dwellings will continue until the end of the emerging Core Strategy (2026). The 'Dwelling Requirement' figures also incorporate an allowance for under-provision against the RSS requirements which arose between the base date of the RSS (1 April 2004) and the SHLAA study base date (1 April 2008), and take account of planned demolitions - please refer to Tables 4.2 to 4.4 for further details.

Table 4.12a Adequacy of Cumulative Housing Potential in Wirral, Forthcoming 5, 10, 15 and 18-Year Periods (Achievability Scenario 2), RSS-BASED TARGETS

Period	Component	Total		PDL	
		Yield	Additional Sites	Yield	Additional Sites
First 5 years	PP	3,091	0	3,091	0
	PP+SS1	3,391	0	3,391	0
	PP+SS1+C1	6,085	77	5,650	51
	PP+SS1+C1+C2	11,640	121	10,883	82
	PP+SS1+C1+C2+C3	21,365	216	19,610	147
	Dwelling Requirement	3,801		3,801	
First 10 years	PP	3,091	0	3,091	0
	PP+SS2	3,556	0	3,556	0
	PP+SS2+C1	6,250	77	5,815	51
	PP+SS2+C1+C2	11,805	121	11,048	82
	PP+SS2+ C1+C2+C3	21,530	216	19,775	147
	Dwelling Requirement	7,264		7,264	
First 15 years	PP	3,091	0	3,091	0
	PP+SS3	4,053	0	4,053	0
	PP+SS3+C1	6,747	77	6,312	51
	PP+SS3+C1+C2	12,302	121	11,545	82
	PP+SS3+C1+C2+C3	22,027	216	20,272	147
	Dwelling Requirement	10,543		10,543	
First 18 years	PP	3,091	0	3,091	0
	PP+SS4	4,053	0	4,053	0
	PP+SS4+C1	6,747	77	6,312	51
	PP+SS4+C1+C2	12,302	121	11,545	82
	PP+SS4+C1+C2+C3	22,027	216	20,272	147
	Dwelling Requirement	12,412		12,412	

Notes:

* 'Additional' = sites additional to those with planning permission

**PDL yield includes dwellings from planning permissions on greenfield land as well as PDL sites, as these greenfield sites will also contribute to the dwelling requirements even if all other future development were to be on PDL sites.

*** The 'Dwelling Requirement' figures in the table are based on the target set by the approved RSS of 500 net additional dwellings in Wirral over the period 2003-21; we have assumed that the annual target will continue until the end of the emerging Core Strategy (2026). These figures also incorporate an allowance for under-provision against the RSS requirements which arose between the base date of the RSS (1 April 2003) and the SHLAA study base date (1 April 2008), and take account of planned demolitions - please refer to Tables 4.2 to 4.4 for further details.

Table 4.12b Adequacy of Cumulative Housing Potential in Wirral, Forthcoming 5, 10, 15 and 18-Year Periods (Achievability Scenario 2), RSS+NGP BASED TARGETS

Period	Component	Total		PDL	
		Yield	Additional Sites	Yield	Additional Sites
First 5 years	PP	3,091	0	3,091	0
	PP+SS1	3,391	0	3,391	0
	PP+SS1+C1	6,085	77	5,650	51
	PP+SS1+C1+C2	11,640	121	10,883	82
	PP+SS1+C1+C2+C3	21,365	216	19,610	147
	Dwelling Requirement	4,301		4,301	
First 10 years	PP	3,091	0	3,091	0
	PP+SS2	3,556	0	3,556	0
	PP+SS2+C1	6,250	77	5,815	51
	PP+SS2+C1+C2	11,805	121	11,048	82
	PP+SS2+ C1+C2+C3	21,530	216	19,775	147
	Dwelling Requirement	8,164		8,164	
First 15 years	PP	3,091	0	3,091	0
	PP+SS3	4,053	0	4,053	0
	PP+SS3+C1	6,747	77	6,312	51
	PP+SS3+C1+C2	12,302	121	11,545	82
	PP+SS3+C1+C2+C3	22,027	216	20,272	147
	Dwelling Requirement	11,443		11,443	
First 18 years	PP	3,091	0	3,091	0
	PP+SS4	4,053	0	4,053	0
	PP+SS4+C1	6,747	77	6,312	51
	PP+SS4+C1+C2	12,302	121	11,545	82
	PP+SS4+C1+C2+C3	22,027	216	20,272	147
	Dwelling Requirement	13,312		13,312	

Notes:

* 'Additional' = sites additional to those with planning permission

** PDL yield includes dwellings from planning permissions on greenfield land as well as PDL sites, as these greenfield sites will also contribute to the dwelling requirements even if all other future development were to be on PDL sites.

*** The 'Dwelling Requirement' figures in the 'RSS+NGP' table are higher than the corresponding figures in the 'RSS' table because they reflect the higher dwelling targets for Wirral over the 2008-17 period. We have assumed that the annual RSS-based dwelling target of 500 net additional dwellings will continue until the end of the emerging Core Strategy (2026). The 'Dwelling Requirement' figures also incorporate an allowance for under-provision against the RSS requirements which arose between the base date of the RSS (1 April 2004) and the SHLAA study base date (1 April 2008), and take account of planned demolitions - please refer to Tables 4.2 to 4.4 for further details.

Table 4.13a Adequacy of Cumulative Housing Potential in Wirral, Forthcoming 5, 10, 15 and 18-Year Periods (Achievability Scenario 3), RSS-BASED TARGETS

Period	Component	Total		PDL	
		Yield	Additional Sites	Yield	Additional Sites
First 5 years	PP	3,091	0	3,091	0
	PP+SS1	3,391	0	3,391	0
	PP+SS1+C1	6,046	76	5,611	50
	PP+SS1+C1+C2	11,640	121	10,883	82
	PP+SS1+C1+C2+C3	21,365	216	19,610	147
	Dwelling Requirement	3,801		3,801	
First 10 years	PP	3,091	0	3,091	0
	PP+SS2	3,556	0	3,556	0
	PP+SS2+C1	6,211	76	5,776	50
	PP+SS2+C1+C2	11,805	121	11,048	82
	PP+SS2+ C1+C2+C3	21,530	216	19,775	147
	Dwelling Requirement	7,264		7,264	
First 15 years	PP	3,091	0	3,091	0
	PP+SS3	4,053	0	4,053	0
	PP+SS3+C1	6,708	76	6,273	50
	PP+SS3+C1+C2	12,302	121	11,545	82
	PP+SS3+C1+C2+C3	22,027	216	20,272	147
	Dwelling Requirement	10,543		10,543	
First 18 years	PP	3,091	0	3,091	0
	PP+SS4	4,053	0	4,053	0
	PP+SS4+C1	6,708	76	6,273	50
	PP+SS4+C1+C2	12,302	121	11,545	82
	PP+SS4+C1+C2+C3	22,027	216	20,272	147
	Dwelling Requirement	12,412		12,412	

Notes:

* 'Additional' = sites additional to those with planning permission

** PDL yield includes dwellings from planning permissions on greenfield land as well as PDL sites, as these greenfield sites will also contribute to the dwelling requirements even if all other future development were to be on PDL sites.

*** The 'Dwelling Requirement' figures in the table are based on the target set by the approved RSS of 500 net additional dwellings in Wirral over the period 2003-21; we have assumed that the annual target will continue until the end of the emerging Core Strategy (2026). These figures also incorporate an allowance for under-provision against the RSS requirements which arose between the base date of the RSS (1 April 2003) and the SHLAA study base date (1 April 2008), and take account of planned demolitions - please refer to Tables 4.2 to 4.4 for further details.

Table 4.13b Adequacy of Cumulative Housing Potential in Wirral, Forthcoming 5, 10, 15 and 18-Year Periods (Achievability Scenario 3), RSS+NGP BASED TARGETS

Period	Component	Total		PDL	
		Yield	Additional Sites	Yield	Additional Sites
First 5 years	PP	3,091	0	3,091	0
	PP+SS1	3,391	0	3,391	0
	PP+SS1+C1	6,046	76	5,611	50
	PP+SS1+C1+C2	11,640	121	10,883	82
	PP+SS1+C1+C2+C3	21,365	216	19,610	147
	Dwelling Requirement	4,301		4,301	
First 10 years	PP	3,091	0	3,091	0
	PP+SS2	3,556	0	3,556	0
	PP+SS2+C1	6,211	76	5,776	50
	PP+SS2+C1+C2	11,805	121	11,048	82
	PP+SS2+ C1+C2+C3	21,530	216	19,775	147
	Dwelling Requirement	8,164		8,164	
First 15 years	PP	3,091	0	3,091	0
	PP+SS3	4,053	0	4,053	0
	PP+SS3+C1	6,708	76	6,273	50
	PP+SS3+C1+C2	12,302	121	11,545	82
	PP+SS3+C1+C2+C3	22,027	216	20,272	147
	Dwelling Requirement	11,443		11,443	
First 18 years	PP	3,091	0	3,091	0
	PP+SS4	4,053	0	4,053	0
	PP+SS4+C1	6,708	76	6,273	50
	PP+SS4+C1+C2	12,302	121	11,545	82
	PP+SS4+C1+C2+C3	22,027	216	20,272	147
	Dwelling Requirement	13,312		13,312	

Notes:

* 'Additional' = sites additional to those with planning permission

** PDL yield includes dwellings from planning permissions on greenfield land as well as PDL sites, as these greenfield sites will also contribute to the dwelling requirements even if all other future development were to be on PDL sites.

*** The 'Dwelling Requirement' figures in the 'RSS+NGP' table are higher than the corresponding figures in the 'RSS' table because they reflect the higher dwelling targets for Wirral over the 2008-17 period. We have assumed that the annual RSS-based dwelling target of 500 net additional dwellings will continue until the end of the emerging Core Strategy (2026). The 'Dwelling Requirement' figures also incorporate an allowance for under-provision against the RSS requirements which arose between the base date of the RSS (1 April 2004) and the SHLAA study base date (1 April 2008), and take account of planned demolitions - please refer to Tables 4.2 to 4.4 for further details.

Table 4.14a Adequacy of Cumulative Housing Potential in Wirral, Forthcoming 5, 10, 15 and 18-Year Periods (Achievability Scenario 4), RSS-BASED TARGETS

Period	Component	Total		PDL	
		Yield	Additional Sites	Yield	Additional Sites
First 5 years	PP	3,091	0	3,091	0
	PP+SS1	3,391	0	3,391	0
	PP+SS1+C1	6,046	76	5,611	50
	PP+SS1+C1+C2	11,126	116	10,369	77
	PP+SS1+C1+C2+C3	21,365	216	19,610	147
	Dwelling Requirement	3,801		3,801	
First 10 years	PP	3,091	0	3,091	0
	PP+SS2	3,556	0	3,556	0
	PP+SS2+C1	6,211	76	5,776	50
	PP+SS2+C1+C2	11,291	116	10,534	77
	PP+SS2+ C1+C2+C3	21,530	216	19,775	147
	Dwelling Requirement	7,264		7,264	
First 15 years	PP	3,091	0	3,091	0
	PP+SS3	4,053	0	4,053	0
	PP+SS3+C1	6,708	76	6,273	50
	PP+SS3+C1+C2	11,788	116	11,031	77
	PP+SS3+C1+C2+C3	22,027	216	20,272	147
	Dwelling Requirement	10,543		10,543	
First 18 years	PP	3,091	0	3,091	0
	PP+SS4	4,053	0	4,053	0
	PP+SS4+C1	6,708	76	6,273	50
	PP+SS4+C1+C2	11,788	116	11,031	77
	PP+SS4+C1+C2+C3	22,027	216	20,272	147
	Dwelling Requirement	12,412		12,412	

Notes:

* 'Additional' = sites additional to those with planning permission

**PDL yield includes dwellings from planning permissions on greenfield land as well as PDL sites, as these greenfield sites will also contribute to the dwelling requirements even if all other future development were to be on PDL sites.

*** The 'Dwelling Requirement' figures in the table are based on the target set by the approved RSS of 500 net additional dwellings in Wirral over the period 2003-21; we have assumed that the annual target will continue until the end of the emerging Core Strategy (2026). These figures also incorporate an allowance for under-provision against the RSS requirements which arose between the base date of the RSS (1 April 2003) and the SHLAA study base date (1 April 2008), and take account of planned demolitions - please refer to Tables 4.2 to 4.4 for further details.

Table 4.14b Adequacy of Cumulative Housing Potential in Wirral, Forthcoming 5, 10, 15 and 18-Year Periods (Achievability Scenario 4), RSS+NGP BASED TARGETS

Period	Component	Total		PDL	
		Yield	Additional Sites	Yield	Additional Sites
First 5 years	PP	3,091	0	3,091	0
	PP+SS1	3,391	0	3,391	0
	PP+SS1+C1	6,046	76	5,611	50
	PP+SS1+C1+C2	11,126	116	10,369	77
	PP+SS1+C1+C2+C3	21,365	216	19,610	147
	Dwelling Requirement	4,301		4,301	
First 10 years	PP	3,091	0	3,091	0
	PP+SS2	3,556	0	3,556	0
	PP+SS2+C1	6,211	76	5,776	50
	PP+SS2+C1+C2	11,291	116	10,534	77
	PP+SS2+ C1+C2+C3	21,530	216	19,775	147
	Dwelling Requirement	8,164		8,164	
First 15 years	PP	3,091	0	3,091	0
	PP+SS3	4,053	0	4,053	0
	PP+SS3+C1	6,708	76	6,273	50
	PP+SS3+C1+C2	11,788	116	11,031	77
	PP+SS3+C1+C2+C3	22,027	216	20,272	147
	Dwelling Requirement	11,443		11,443	
First 18 years	PP	3,091	0	3,091	0
	PP+SS4	4,053	0	4,053	0
	PP+SS4+C1	6,708	76	6,273	50
	PP+SS4+C1+C2	11,788	116	11,031	77
	PP+SS4+C1+C2+C3	22,027	216	20,272	147
	Dwelling Requirement	13,312		13,312	

Notes:

* 'Additional' = sites additional to those with planning permission

** PDL yield includes dwellings from planning permissions on greenfield land as well as PDL sites, as these greenfield sites will also contribute to the dwelling requirements even if all other future development were to be on PDL sites.

*** The 'Dwelling Requirement' figures in the 'RSS+NGP' table are higher than the corresponding figures in the 'RSS' table because they reflect the higher dwelling targets for Wirral over the 2008-17 period. We have assumed that the annual RSS-based dwelling target of 500 net additional dwellings will continue until the end of the emerging Core Strategy (2026). The 'Dwelling Requirement' figures also incorporate an allowance for under-provision against the RSS requirements which arose between the base date of the RSS (1 April 2004) and the SHLAA study base date (1 April 2008), and take account of planned demolitions - please refer to Tables 4.2 to 4.4 for further details.

Table 4.15a Adequacy of Cumulative Housing Potential in Wirral, Forthcoming 5, 10, 15 and 18-Year Periods (Achievability Scenario 5), RSS-BASED TARGETS

Period	Component	Total		PDL	
		Yield	Additional Sites	Yield	Additional Sites
First 5 years	PP	3,091	0	3,091	0
	PP+SS1	3,376	0	3,376	0
	PP+SS1+C1	5,958	73	5,537	48
	PP+SS1+C1+C2	10,711	111	9,968	73
	PP+SS1+C1+C2+C3	21,350	216	19,595	147
	Dwelling Requirement	3,801		3,801	
First 10 years	PP	3,091	0	3,091	0
	PP+SS2	3,541	0	3,541	0
	PP+SS2+C1	6,123	73	5,702	48
	PP+SS2+C1+C2	10,876	111	10,133	73
	PP+SS2+ C1+C2+C3	21,515	216	19,760	147
	Dwelling Requirement	7,264		7,264	
First 15 years	PP	3,091	0	3,091	0
	PP+SS3	4,053	0	4,053	0
	PP+SS3+C1	6,635	73	6,214	48
	PP+SS3+C1+C2	11,388	111	10,645	73
	PP+SS3+C1+C2+C3	22,027	216	20,272	147
	Dwelling Requirement	10,543		10,543	
First 18 years	PP	3,091	0	3,091	0
	PP+SS4	4,053	0	4,053	0
	PP+SS4+C1	6,635	73	6,214	48
	PP+SS4+C1+C2	11,388	111	10,645	73
	PP+SS4+C1+C2+C3	22,027	216	20,272	147
	Dwelling Requirement	12,412		12,412	

Notes:

* 'Additional' = sites additional to those with planning permission

** PDL yield includes dwellings from planning permissions on greenfield land as well as PDL sites, as these greenfield sites will also contribute to the dwelling requirements even if all other future development were to be on PDL sites.

*** The 'Dwelling Requirement' figures in the table are based on the target set by the approved RSS of 500 net additional dwellings in Wirral over the period 2003-21; we have assumed that the annual target will continue until the end of the emerging Core Strategy (2026). These figures also incorporate an allowance for under-provision against the RSS requirements which arose between the base date of the RSS (1 April 2003) and the SHLAA study base date (1 April 2008), and take account of planned demolitions - please refer to Tables 4.2 to 4.4 for further details.

Table 4.15b Adequacy of Cumulative Housing Potential in Wirral, Forthcoming 5, 10, 15 and 18-Year Periods (Achievability Scenario 5), RSS+NGP BASED TARGETS

Period	Component	Total		PDL	
		Yield	Additional Sites	Yield	Additional Sites
First 5 years	PP	3,091	0	3,091	0
	PP+SS1	3,376	0	3,376	0
	PP+SS1+C1	5,958	73	5,537	48
	PP+SS1+C1+C2	10,711	111	9,968	73
	PP+SS1+C1+C2+C3	21,350	216	19,595	147
	Dwelling Requirement	4,301		4,301	
First 10 years	PP	3,091	0	3,091	0
	PP+SS2	3,541	0	3,541	0
	PP+SS2+C1	6,123	73	5,702	48
	PP+SS2+C1+C2	10,876	111	10,133	73
	PP+SS2+ C1+C2+C3	21,515	216	19,760	147
	Dwelling Requirement	8,164		8,164	
First 15 years	PP	3,091	0	3,091	0
	PP+SS3	4,053	0	4,053	0
	PP+SS3+C1	6,635	73	6,214	48
	PP+SS3+C1+C2	11,388	111	10,645	73
	PP+SS3+C1+C2+C3	22,027	216	20,272	147
	Dwelling Requirement	11,443		11,443	
First 18 years	PP	3,091	0	3,091	0
	PP+SS4	4,053	0	4,053	0
	PP+SS4+C1	6,635	73	6,214	48
	PP+SS4+C1+C2	11,388	111	10,645	73
	PP+SS4+C1+C2+C3	22,027	216	20,272	147
	Dwelling Requirement	13,312		13,312	

Notes:

* 'Additional' = sites additional to those with planning permission

** PDL yield includes dwellings from planning permissions on greenfield land as well as PDL sites, as these greenfield sites will also contribute to the dwelling requirements even if all other future development were to be on PDL sites.

*** The 'Dwelling Requirement' figures in the 'RSS+NGP' table are higher than the corresponding figures in the 'RSS' table because they reflect the higher dwelling targets for Wirral over the 2008-17 period. We have assumed that the annual RSS-based dwelling target of 500 net additional dwellings will continue until the end of the emerging Core Strategy (2026). The 'Dwelling Requirement' figures also incorporate an allowance for under-provision against the RSS requirements which arose between the base date of the RSS (1 April 2004) and the SHLAA study base date (1 April 2008), and take account of planned demolitions - please refer to Tables 4.2 to 4.4 for further details.

5 REVIEW OF THE SHLAA, AND CONSIDERATION OF BROAD LOCATIONS AND WINDFALLS

Introduction

- 5.1 In Section 3 we explained how we assessed the deliverability/developability of the SHLAA sites, which enabled us to establish how much housing they could provide over 5, 10, 15 and 18-year periods from April 2008 when considered together with outstanding planning commitments. We then compared the capacity identified by the study with the Borough's dwelling targets to ascertain whether there is any shortfall in housing land supply.
- 5.2 The findings from the study process are set out fully in Section 4, which shows that the 517 specific SHLAA sites that are located outside of the Green Belt, when considered together with outstanding planning commitments, are theoretically capable of providing sufficient dwellings to meet the long-term dwelling targets set by the RSS with an additional headroom of some 9,600 dwellings. Indeed, the potential supply of around 22,000 dwellings is sufficient to meet the higher 'RSS+NGP' based target, which for the 18-year study timeframe is substantial at just over 13,300 dwellings, with an additional headroom of some 8,700 dwellings.
- 5.3 In effect, the work described above constitutes our Stage 8 review of the assessment³². The Guidance advises that if the Stage 8 review indicates a shortfall against the dwelling targets, then this should be planned for either by identifying 'broad locations' (Stage 9), and/or by using a windfall allowance (Stage 10).
- 5.4 Whilst our work has demonstrated that the 18-year dwelling targets can be achieved from the 517 specific sites outside of the Green Belt together with outstanding commitments, we nevertheless consider it helpful to consider the potential supply from as yet unidentified sites. We do this below, before commenting briefly on broad locations.

Determining the Potential Contribution from Unidentified Sites

- 5.5 Footnote 31 on page 19 of PPS3 defines windfall sites as:
- '...those which have not been specifically identified as available in the local plan process. They comprise previously-developed sites that have unexpectedly become available. These could include, for example, a factory closure or small sites such as a residential conversion or a new flat over a shop.'*
- 5.6 Where there is evidence of a high and consistent proportion of new dwellings generated on sites that were not expected to come forward for development, there is a strong case for adopting a windfall allowance as an element of the total housing requirement for the district. There is a clearly recognised risk that, if unexpected developments (such as changes of use or subdivisions of large houses) - which are likely to occur, regardless of

³² The Borough Council and the Steering Group will also consider the emerging study outputs, which will constitute a further review of our findings.

how thorough the SHLAA is - are not taken into account, then this could lead to over-allocation of greenfield or other sensitive land, which would be counter to PPS3.

- 5.7 It is reasonable to assume that most of the large potential housing sites have been included in the SHLAA. However, although a comprehensive approach to site identification has been taken, and a site size threshold has not been used, it is inevitable that further dwellings will come forward for development which by definition would not be covered as part of the SHLAA site assessment, such as conversions and changes of use. As yet unforeseen infill schemes, which are difficult to identify comprehensively in advance, will also inevitably come forward in the future.
- 5.8 The number of past completions from changes of use and conversions (residential subdivision) across the Borough is shown in Table 5.1. The table covers the eight-year period 2001-09, which is long enough not to be unduly affected by unusual circumstances in particular years.

Table 5.1 Past Dwelling Completions in Wirral from Changes of Use and Conversions

	2001-02	2002-03	2003-04	2004-05	2005-06	2006-07	2007-08	2008-09	2001-09	Annual Average
Total Net Supply from COU and Conversions	104	43	74	81	55	115	155	154	781	98

Source: Figures supplied by Wirral Council

- 5.9 The table shows that, across the Borough as a whole, a total of 781 dwellings were completed in change of use and conversion schemes over the eight-year analysis period. This equates to an average of 98 dpa, which is significant. The supply has remained relatively constant over the period - and has actually increased in recent years - indicating that these potential sources are not yet close to depletion. Additionally, there will have been some development on unforeseen infill sites although this is not reflected in the Council's figures.
- 5.10 Paragraph 54 of PPS3 states that the supply for the first five years should be based on '*specific deliverable sites*'. Accordingly, we would not recommend making a windfall allowance for the first 5-year period, although we consider that it might be appropriate for the Council to make a windfall allowance for the subsequent study periods. The use of such an allowance in the post 5-year study periods will help to ensure that the SHLAA is as realistic and robust as possible.
- 5.11 The eight-year average annual completion rate in Table 5.1 would translate to windfall allowances of 490, 980 and 1,179 dwellings, respectively, for the 2013-18, 2013-23 and 2013-26 study periods. However, because a site size threshold has not been used, and therefore a comprehensive approach to site identification has been taken, we consider that a more cautious approach is necessary and that the allowance should be reduced to avoid the potential for double-counting.

- 5.12 Accordingly, we consider the following windfall allowances to be appropriate; these are based on an annual rate of 32 dpa (i.e. approximately one third of the eight-year annual average):
- 2013-18: allowance of 160 dwellings (i.e. 5 x 32).
 - 2013-23: allowance of 320 dwellings (i.e. 10 x 32).
 - 2013-26: allowance of 416 dwellings (i.e. 13 x 32).
- 5.13 As noted above, the figures above are based on changes of use and conversions and do not include other windfalls (such as development on infill sites). The figures should therefore be regarded as conservative.

Broad Locations

- 5.14 On the conservative basis set out above, changes of use and conversions from as yet unidentified sites could be expected to deliver a further 416 dwellings over the period 2013 to 2026. Taken together with the supply of around 22,000 dwellings from the 517 SHLAA sites that are not within the Green Belt as well as outstanding planning commitments, this gives an overall supply of 22,488 dwellings. This figure is approximately 9,000 dwellings in excess of the 18-year 'RSS+NGP' dwelling target of 13,312 dwellings, or 10,000 dwellings above the 18-year RSS-based target of 12,412 dwellings.
- 5.15 The substantial Wirral Waters regeneration project aims to deliver in the region of 15,000 dwellings over its 30-40 year lifetime. Turley Associates/Peel expect that around 9,000 of these dwellings will come forward by 2026, meaning that Wirral Waters offers considerable further potential over and above the theoretical supply of just over 22,000 dwellings that we have identified through this study.
- 5.16 Accordingly, there does not appear to be an overwhelming need to identify any 'broad locations' in the SHLAA. Nevertheless, almost half of the Borough's housing supply comes from 12 substantial sites within the Wirral Waters, Woodside/Rose Brae and Scott's Quay development areas. All of these sites are located in the east of the Borough, within the HMR area, and are likely to be developed as apartments. Furthermore, just under half of the potential from the 517 SHLAA sites outside of the Green Belt is derived from sites within the Inner Area.
- 5.17 Through the LDF preparation process, the Council will have to consider whether the identified supply is in the right place, and sufficiently diverse in terms of the range of housing sites, to meet strategic policy objectives. These considerations are beyond the remit of the SHLAA, although we would again make the point that almost half of the Borough is covered by Green Belt and this would be an important factor if the Council was to consider any significant urban extensions.

