

Policy CS18 – Housing Requirement

Summary of Comments Received	Recommended Response
A target of 500 (net) completions per annum is undeliverable. The Annual Monitoring Report for 2012 shows just 26 extra new homes were completed in Wirral in 2011/12 and that “an annual average of 724 net additional dwellings would now be needed to reach the Regional Spatial Strategy target of 9,000 new homes by 2021”. The aspiration that this target will be met from the current land supply is pure fantasy.	No change is recommended, at this stage. The forthcoming Strategic Housing Market Assessment will determine the Council’s position in relation to future housing need including a new housing requirement figure for Wirral.
The target of 500 net dwellings per annum contrasts with Council's 2012 Annual Monitoring Report, which states that an annual average of 724 net additional dwellings would now be needed to reach the Regional Spatial Strategy target of 9,000 new homes by 2021. A target of 500 dwellings is therefore considered unsound and will fail to deliver the (robustly assessed) housing needs for the area.	No change is recommended, at this stage. The forthcoming Strategic Housing Market Assessment will determine the Council’s position in relation to future housing need including a new housing requirement figure for Wirral.
Paragraph 20.1 of Policy CS18 should be amended to read: “Policy CS18 sets out how many additional new homes the Council will seek to provide for in the period to 2028. <u>It is based on Government published household projections with an additional uplift to reflect the opportunity for major housing growth at Wirral Waters to deliver the regeneration of east Wirral and support the economic growth objectives of the Borough and wider City Region utilising a previously developed and sustainably located land resource at the heart of the Liverpool City Region.</u> ”	No change is recommended, at this stage. The forthcoming Strategic Housing Market Assessment will determine the Council’s position in relation to future housing need including a new housing requirement figure for Wirral.
New housing development especially on ‘green’ land cannot be sustainable when so many modern houses built in recent years remain unoccupied. A better assessment of need is required.	No change is recommended, at this stage. The forthcoming Strategic Housing Market Assessment will determine the Council’s position in relation to future housing need.
Policy CS18 fails to meet the full and objectively assessed needs of the Borough required by national policy. The Council’s existing Strategic Housing Market Assessment, which is now out of date, identifies a requirement for at least 570 dwellings per annum over the plan period. Spreading the supply required by the Regional Spatial Strategy over the entire Core Strategy plan period up to 2028 is not acceptable. The Council’s Strategic Housing Land Availability Assessment indicates a shortfall in provision over the plan period, even though it includes an over optimistic assessment of deliverability.	No change is recommended, at this stage. The forthcoming Strategic Housing Market Assessment will determine the Council’s position in relation to future housing need including a new housing requirement figure for Wirral.

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The 2011 Census shows that previous population forecasts have been significantly underestimating population growth. The Regional Spatial Strategy housing requirement figure should therefore be used as a minimum target until more detailed population figures become available.	No change is recommended, at this stage. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need including a new housing requirement figure for Wirral.
There has been significant under delivery since 2003/04 and a 20 per cent buffer should be applied to any calculation of housing land requirements in Wirral.	No change is recommended, at this stage, as the application of the 5 per cent or 20 per cent buffer required by national policy is subject to change over time and will be dependent on the Council's latest housing position. It is, however, accepted that the Council will need to ensure that a 20 per cent buffer can be provided, if required.
The projected levels of development are more than double average net housing completions since 2003 (207 per year), which included both boom and recession. The Regional Spatial Strategy targets are unsound for Wirral, as the major constraint is not land supply, but lack of money in the local economy. Applying these targets could lead to the premature release of Green Belt land. The target should be reduced to one that might be achievable in the likely economic circumstances. Wirral must be allowed to take windfalls into account as many Victorian properties in poor condition are not fit for purpose, and will make a significant contribution to the housing supply. Empty properties should also be included. The numbers should be no more than 300 net completions a year.	No change is recommended, at this stage. The forthcoming Strategic Housing Market Assessment (SHMA) will determine the Council's position in relation to future housing need including a new housing requirement figure for Wirral. The SHMA will consider the contribution of empty homes. The housing land supply set out in Table 20.2 of the Core Strategy already includes an allowance for windfalls, based on historic delivery.
Support an above-baseline forecast figure and a growth-orientated approach which recognises the significant potential for major residential growth and regeneration in east Wirral to drive forward the economic transformation of the Borough and the wider City Region but a stronger justification is needed for a figure based on Policy L4 of the Regional Spatial Strategy which will have been formally revoked by the time the Core Strategy is submitted to the Secretary of State.	No change is recommended, at this stage. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need including a new housing requirement figure for Wirral.
It is not realistic to expect this substantial target to be met wholly within the existing urban areas. The low level of housing growth proposed for Irby, Gayton and the rest of Settlement Area 7 – Heswall, will fall a long way short of meeting local needs. More development should, and will have to, take place in the west of the Borough to meet the identified need for new housing.	No change is recommended, at this stage. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need including a new housing requirement figure for Wirral.

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It is not realistic to expect this substantial target to be met wholly within the existing urban areas. The low level of housing growth proposed for Meols and the rest of Settlement Area 6 – Hoylake and West Kirby, will fall a long way short of meeting local needs. More development should, and will have to, take place in the west of the Borough to meet the identified need for new housing.	No change is recommended, at this stage. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need including a new housing requirement figure for Wirral.
The National Planning Policy Framework buffer is not an optional target that can be ignored and should be included in Policy CS18, rather than in the supporting text to Policy CS19 – Housing Implementation Plan.	No change is recommended, at this stage, as the application of the 5 per cent or 20 per cent buffer required by national policy is subject to change over time and will be dependent on the Council's latest housing position. It is, however, accepted that the Council will need to ensure that a 20 per cent buffer can be provided, if required.
The Regional Spatial Strategy requirement of 500 net dwellings per annum does not reflect other factors such as natural change or migration. It is clear that the housing requirement should be increased beyond the 500 dwellings currently proposed to around 600-750 dwellings per annum, as Policy CS18 is not based on up to date evidence and underestimates the actual need. A further comparable increase in population is expected over the next ten years.	No change is recommended, at this stage. The forthcoming Strategic Housing Market Assessment (SHMA) will determine the Council's position in relation to future housing need including a new housing requirement figure for Wirral. The SHMA will take account of the latest available population and household projections, based on the 2011 Census.
The Policy CS18 requirement is below the requirement identified in the Council's existing Strategic Housing Market Assessment and does not include the 20 per cent buffer required by national policy.	No change is recommended, at this stage. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need including a new housing requirement figure for Wirral. The application of the 5 per cent or 20 per cent buffer required by national policy is subject to change over time and will be dependent on the Council's latest housing position. It is, however, accepted that the Council will need to ensure that a 20 per cent buffer can be provided, if required.
The Council should be planning to meet the full need established by the Council's existing Strategic Housing Market Assessment (i.e. 41,760 dwellings), which is undeliverable without the release of strategic greenfield sites.	No change is recommended, at this stage. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need including a new housing requirement figure for Wirral.
Support the Council's decision not to rigidly distinguish between the numbers of new dwellings which should be delivered within each Settlement Area, to ensure flexibility and choice in delivery.	No change recommended

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It is not clear how the overall scale of proposed housing will be distributed across the different Settlement Areas.	No change recommended, as detailed development scenarios have already been provided to the respondent, to allow the consideration of appropriate infrastructure requirements and the respondent does not currently have any concern regarding the soundness of the Core Strategy.
Policy CS18 is based on the Regional Spatial Strategy annual requirement of 500 dwellings per year (2003-21) rolled forward to 2028. The minimum annual requirement identified in the Council's existing Strategic Housing Market Assessment (SHMA) is 570 dwellings per annum. The Council should take the actual housing need into account. The SHMA identifies an affordable housing need of 2,784 dwellings per annum. A housing requirement of 500 dwellings per annum is only 18% of the actual affordable housing need, without even addressing market demand. The Council's Strategic Housing Land Availability Assessment suggests that more than 500 dwellings per annum could be delivered.	No change is recommended, at this stage. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need including a new housing requirement figure for Wirral.
The imbalance between the need for smaller accommodation for older people as well as other smaller households who are not elderly or in need of support and the current emphasis on extending existing smaller properties and on building large new houses needs to be addressed.	No change is recommended, as the forthcoming Strategic Housing Market Assessment will determine the Council's position with regard to future housing needs and the need for different types and sizes of property.
Wirral has significantly under-delivered against housing targets over past years and yet many unoccupied properties and houses for sale remain. This must indicate that the "forecasts" are at best inflated and inaccurate and at worst will be damaging to the area. The methodology of the Council's existing Strategic Housing Market Assessment, which is based on aspirations, is fundamentally wrong. The reality of "housing need" is reflected in the state of the second hand market with a drop in value of some 15% in Wirral and a number of empty and un-used properties.	No change is recommended, at this stage. The forthcoming Strategic Housing Market Assessment will determine the position in relation to future housing need, market signals and the role empty homes can play in meeting local housing needs.
Concerned about the definition of developable sites and who decides.	No change is recommended, as the definition of a 'developable' site is set out in the National Planning Policy Framework, which says that developable sites "should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged." (NPPF, footnote 12 refers).

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The approach in Table 20.1 is inconsistent with the Council's Strategic Housing Land Availability Assessment 2012, which seeks to make the existing shortfall up in the first five years and indicates that an additional 767 dwellings are required in the five year period 2012-17 to account for projected demolitions between 2012 and 2017.	No change is recommended. The figure included in paragraph 20.9 of the Core Strategy has been calculated using the same methodology as that used in the Council's Strategic Housing Land Availability Assessment and does assume that the 'backlog' in housing delivery is met within the first five years and that an additional 767 dwellings will be required to account for projected demolitions. Figures for 2013 will be included in the revised Core Strategy.