

Policy CS19 – Housing Implementation Plan

Summary of Comments Received	Recommended Response
Policy CS19 will not deliver the required development without a review of the Green Belt.	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.
The housing strategy must be realistic. The Council's Annual Monitoring Report for 2012 shows 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. It confirms that 80% of completions are now outside the regeneration priority area and that new affordable home completions fell by a third. There is little sign of significant improvement. These concerns are not simply short-term considerations and other sites are needed.	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. The order of search identified in Policy CS19 will not prevent sites coming forward elsewhere where suitable, developable sites cannot be identified within the regeneration priority areas. The forthcoming Core Strategy Viability Study will determine the Council's position on the scale and location of development.
The Council's Strategic Housing Land Availability Assessment 2012 indicates that based on an annual requirement of 500 dwellings per annum, the Council does not have a five year supply, despite the inclusion of 1,100 dwellings at Wirral Waters. Table 20.3 shows that just over half the units, with the exception of Wirral Waters, are currently subject to alternative uses or designations which could affect the timing, scale, pattern of future development, which may require further assessment before they could be released for new housing. The reliance on Wirral Waters, the failure to demonstrate a five year land supply and the constraints to delivery of identified sites in Table 20.3 means that Green Belt land is now a logical choice, especially if the housing requirement is increased to 570 dwellings per annum, in line with the Council's existing Strategic Housing Market Assessment.	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. The bringing forward of sites outside the existing order of search will currently be dealt with under Policy CS20 – Housing Contingencies.
The shortfall against the dwelling requirements in the Regional Spatial Strategy should be made up in the first five years in line with the Council's Strategic Housing Land Availability Assessment.	No change is recommended. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need. The Council's latest five-year housing land position is set out in Appendix 3 to the Annual Monitoring Report 2012. This calculation assumes that the backlog since 2003 is met within the five year period between 2012 and 2017.

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The strategy set out in Policy CS19 is too limited. It is not clear that the Council would be able to identify new housing sites, particularly if the limitations on existing employment sites remain, for example at Moreton, under Policy CS8 – Priorities for Leasowe, Moreton, Upton, Greasby and Woodchurch and Policy CS17 – Protection of Employment Land.	No change is recommended, as the order of search identified in Policy CS19 will not prevent sites from coming forward where suitable, developable sites cannot be identified from other categories.
The first tier in the order of search in Policy CS19 should be re-worded as follows: “ <u>areas of greatest need; previously developed sites and undeveloped sites subject to an alternative non-residential allocation where it has been demonstrated that there are no reasonable prospects of coming forward for its allocated use,</u> ” as Policy CS19 currently prevents the delivery of residential development on sites which are currently undeveloped and allocated for alternative uses in the adopted Unitary Development Plan.	No change is recommended. The first tier in the order of search is currently “previously developed sites within areas of greatest need” and the last tier is currently “previously undeveloped sites within the urban area.” The proposed amendment would serve to undermine the priority that is currently given to the development of previously developed sites in line with paragraph 17 of the National Planning Policy Framework.
The fourth tier of sites in the order of search in Policy CS19 should be split and reworded to read: “previously undeveloped sites <u>within the areas of greatest need</u> ” and “previously undeveloped sites <u>within the urban area outside areas of greatest need</u> , subject to Policy CS30” to ensure that areas of greatest need are prioritised ahead of sites elsewhere within the wider urban area in line with the Council's regeneration aspirations.	No change recommended, as previously undeveloped sites in areas of greatest need are often more scarce than previously undeveloped sites in other parts of the urban area and the proposed amendment would place a greater emphasis on their loss.
The Council's latest Annual Monitoring Report 2012 shows that the Council cannot demonstrate an immediately deliverable 5-year supply of housing land. As this is insufficient to satisfy the requirements of national policy, it is inappropriate to seek to prioritise previously developed land, which will only restrict growth at a time when additional sites must come forward immediately to meet the identified backlog against the Regional Spatial Strategy in the first five years and an additional 20 per cent buffer.	No change is recommended, as the order of search identified in Policy CS19 will not prevent sites coming forward where suitable, developable sites cannot be identified from other categories and paragraph 17 of the National Planning Policy Framework still seeks to encourage the reuse of previously developed land.
The Council's Annual Monitoring Report demonstrated that the delivery of the housing targets will not be met and it is blatantly obvious that a Green Belt review is required as a matter of urgency.	No change is recommended. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need. The bringing forward of sites outside the existing order of search will currently be dealt with under Policy CS20 – Housing Contingencies.

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A sequential selection of sites is no longer found in national policy. Bearing in mind the Council's inability to demonstrate a five-year supply, the need for such a mechanism has not been justified as being reasonable or necessary.	No change is recommended, as the National Planning Policy Framework still seeks to encourage the effective use of land by reusing land that has been previously developed, provided that it is not of high environmental value (NPPF, paragraph 17) and still allows local plans to set out a clear strategy for allocating sufficient land which is suitable for development, providing it can be demonstrated that objectively assessed needs can be met with sufficient flexibility, taking account of the needs of residential and business communities.
If retained the order of search in Policy CS19 should include " <u>previously developed sites within the rural area</u> ", which is appropriate in the Green Belt in national policy, and lastly " <u>undeveloped sites in the rural area</u> ".	No change is recommended, as the development of previously developed sites in the Green Belt is already provided for under national policy and Policy CS3 – Green Belt, and the bringing forward of sites outside the existing order of search will currently be dealt with under Policy CS20 – Housing Contingencies.
The trajectory at Picture 20.1 is wholly unrealistic, especially bearing in mind recent performance with completions in 2011/12 at 22 dwellings. It is unrealistic to think that completions in 2012/13 will increase to nearly 1,200 dwellings without some significant policy intervention or other changes occurring.	No change is recommended, as Picture 20.1 identifies a total potential capacity of up to 1,200 units in 2012/13 but assumes that actual net completions will broadly match the average number of net completions between 2008 and 2012, equivalent to 147 net new dwellings. The forthcoming Core Strategy Viability Study will determine the Council's position in the likely scale of future development.
The Council is currently unable to identify a five year housing land supply in its most recent Strategic Housing Land Availability Assessment (SHLAA) and Annual Monitoring Report. The SHLAA also provides an over-optimistic assessment of deliverability particularly in the early part of the plan period, for example, by assuming that existing permissions will all come forward in the five year period, despite the fact that many of these sites are unviable or undeliverable in the current market.	No change is recommended. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need and the forthcoming Core Strategy Viability Study will determine the Council's position with regard to future viability.
It is not realistic to expect the Borough's challenging dwelling targets to be met wholly within the existing urban areas. The order of search outlined in Policy CS19 does not consider sites outside the existing urban area even though sites outside the existing urban area may represent the best opportunity to accommodate much needed new housing, including affordable units.	No change is recommended. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need. The bringing forward of sites outside the existing order of search will currently be dealt with under Policy CS20 – Housing Contingencies.

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The housing supply position should be completely reviewed more regularly than every five years, particularly since the supply in Wirral could be affected significantly by the delivery or otherwise of Wirral Waters.	No change is recommended. Although the housing land supply will continue to be subject to ongoing annual monitoring, undertaking a complete review of the Council's housing land supply every year is considered too onerous in terms of resources available.
Table 20.2 – Housing Land Supply April 2012 is already out-of-date. The most recent Annual Monitoring Report shows that the Council is unable to demonstrate a deliverable five-year supply. The supply that does exist includes sites without any planning status. The realistic five-year supply is therefore likely to be significantly lower. Extreme caution should be applied when including sites without permission in the housing supply and more emphasis should be placed on the fact that this is only theoretical potential capacity. Recent appeal decisions confirm that 'pre-application' sites should not be included in the five-year land supply calculation.	No change is recommended. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need and the Core Strategy Viability Study will determine the Council's position with regard to future viability. Figures for 2013 will be included in the revised Core Strategy.
Policy CS19 should be amended to identify " <u>sustainable greenfield sites</u> " as a 5th priority for seeking to identify additional housing sites.	No change is recommended, as the last tier in the order of search is currently "previously undeveloped sites within the urban area" and the bringing forward of sites outside the existing order of search will currently be dealt with under Policy CS20 – Housing Contingencies.
The sequential approach in Policy CS19 fails to take into account the sustainability of rural settlements such as Thornton Hough, which already has a Post Office, public house/restaurant, church and primary school, or their future sustainability needs or recognise that greenfield sites might be more sustainable than brownfield sites, for example in terms of accessibility to local services. Restricting the Implementation Plan to previously developed sites/undeveloped sites in the urban area will not provide sufficient flexibility to ensure that housing targets will be met.	No change is recommended. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need. The development of previously developed sites in the Green Belt is already provided for under national policy and Policy CS3 – Green Belts, and Infill Villages are already identified in the existing Unitary Development Plan. The bringing forward of sites outside the existing order of search will currently be dealt with under Policy CS20 – Housing Contingencies.
National policy requires the Council to demonstrate a 5-year supply of housing land. Greenfield and Green Belt sites need to be considered and their broad location needs to be identified in the Core Strategy.	No change is recommended. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need. The broad location of new housing development is currently expected to be identified as part of a future site-specific Local Plan.
Point 4 of Policy CS19 should be amended to read: "subject to Policies CS30-39" to ensure that all environmental impacts are taken into account and to make the impact of Policy CS19 less "uncertain".	No change is recommended as Policy CS19 already states that planning permission will be granted subject to Policy CS21 – Criteria for New Housing Development, which includes all the safeguards requested applied under Policy CS42 – Development Management.

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<p>The identified housing land supply includes land designated for employment purposes and land currently used for recreation which is unlikely to be developed and should be retained. The order of preference between spatial areas should therefore be removed, particularly to allow growth in Wirral's rural settlements.</p>	<p>No change is recommended. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need. The order of search identified in Policy CS19 has been included to support the delivery of the Spatial Vision, Strategic Objectives and Broad Spatial Strategy, in line with paragraph 17 of the National Planning Policy Framework. The bringing forward of sites outside the existing order of search will currently be dealt with under Policy CS20 – Housing Contingencies. Policy CS17 – Protection for Employment Land, and Policy CS31 – Recreational Land and Buildings, allows for the detailed assessment of sites designated for employment and recreation.</p>
<p>A caveat needs to be applied to all brownfield sites to read: "<u>excluding the small proportion of brownfield sites which have developed environmental value, where that value cannot be retained in the development in accordance with policies CS30 and CS33.</u>"</p>	<p>No change is recommended, as Policy CS19 already states that planning permission will be granted for suitable sites subject to Policy CS21 – Criteria for New Housing Development, which includes the safeguards applied under Policy CS30 – Requirements for Green Infrastructure and Policy CS33 – Biodiversity and Geodiversity, applied under Policy CS42 – Development Management.</p>