

Policy CS20 – Housing Contingencies

Summary of Comments Received	Recommended Response
This is not an effective contingency plan. The Council does not have a 5-year supply and applying the Core Strategy policies in the current economic circumstances will continue this shortfall unless the Green Belt is reviewed now.	No change is recommended, at this stage. The forthcoming Strategic Housing 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 on the scale and location of future development.
The Core Strategy should ensure that enough land is provided to meet the required need with sufficient flexibility to deal with changing circumstances and the potential for delays to Wirral Waters. Green Belt release should be dealt with up-front, rather than being left to monitoring and review, particularly as any Green Belt review would take time to undertake and implement before development could go ahead on Green Belt sites, to prevent additional pressure on neighbouring authorities to accommodate any unmet need.	No change is recommended at this stage. The forthcoming Strategic Housing Assessment will determine the Council's position in relation to future housing need.
Paragraph 20.23 casts doubt over the deliverability of Wirral Waters. Whilst the need for a contingency to safeguard against slower than expected delivery of housing is recognised, this uncertainty applies to all proposed housing sites. It is not appropriate to single out a specific development as being at greater risk of stalled delivery than others. The reasoned justification should therefore be amended to read: <u>"The rate of delivery of new housing development will be monitored throughout the Core Strategy plan period. If from this it is evident that the level and rate of housing growth from the identified supply of housing sites is less than anticipated contingency action plan will need to be implemented."</u>	Accepted. It is therefore recommended that Policy CS20 is amended to delete the reference to Wirral Waters to read: "If new housing does not come forward within the first five years..." Paragraph 20.23 reflects specific comments submitted by third parties in response to the Strategic Housing Land Availability Assessment 2008 (Cabinet 21 July 2011, Minute 80 refers), Strategic Housing Land Availability Assessment 2011 (Cabinet 19 July 2012, Minute 61 refers) and the Preferred Options Report (Cabinet 21 July 2011, Minute 80 refers) about the ability to deliver sufficient levels of housing within the previous regeneration priority areas. It is therefore recommended that paragraph 20.23 is amended to delete the reference to Wirral Waters to read: "The principal areas of uncertainty identified through public consultation relate to the scale and timing of future development and the ability to continue to deliver housing within the previous regeneration priority areas associated with the Newheartlands Pathfinder..."

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<p>Support the proposal to carry out a review of Green Belt only at the point defined in Policy CS20, to avoid the premature allocation of land within Green Belt and consequent impact on other more suitable sites but Green Belt 'functions' should be defined somewhere in Core Strategy in order to ensure clarity and manage expectations.</p>	<p>Accepted. It is recommended that paragraph 20.25 is amended to read: <u>“The purpose of the Green Belt in national policy is to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns merging into one another; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</u> The consideration of individual sites will, wherever possible, be undertaken as part of a wider sub-regional review of Green Belt boundaries, to provide a co-ordinated approach based on joint working across the sub-region and with adjoining authorities. Any future review of sites suitable for housing will also be combined with a review of requirements for employment, retail and open space.”</p>
<p>Agree that the Core Strategy should be flexible enough to provide for an ongoing five-year supply of deliverable housing sites throughout the period to 2028 in the event that Wirral Waters does not deliver as expected and that the only alternative source of land for development outside of the urban areas is in the Green Belt but the Core Strategy should look to review the Green Belt and allocate land as well as identifying safeguarded land, in the event that the level of future housing land supply identified does not deliver as expected. This matter cannot be left to the Site Allocations DPD.</p>	<p>No change is recommended, at this stage. The forthcoming Strategic Housing Assessment will determine the Council's position in relation to future housing need.</p>
<p>The Green Belt should be considered immediately and not after 2018. The concept of Green Belt as a 'last resort' is not realistic given the record of housing delivery. The Council's Strategic Housing Land Availability Assessment assumes that sites can be 'brought forward' from Category Three to fill the potential shortfall in housing land over the 5 and 10 year period from 2012. These sites are not currently developable. Category Three sites account for almost half of the total units required to 2028. The need for a buffer justifies looking immediately for alternative sites not just in existing urban areas but also within the Green Belt.</p>	<p>No change is recommended, at this stage. The forthcoming Strategic Housing Assessment will determine the Council's position in relation to future housing need.</p>

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A Green Belt review should be done now to proactively ensure an adequate supply of housing land over the short to medium term. It should not be done in a reactionary manner. The Council cannot demonstrate a 5 year supply of housing land; there has been a significant population growth above and beyond previously projected figures; there is no guarantee that housing will come forward at Wirral Waters in the short term; and there are insufficient sites within the urban area to provide an adequate supply of immediately deliverable housing land.	No change is recommended, at this stage. The forthcoming Strategic Housing Assessment will determine the Council's position in relation to future housing need. The forthcoming Core Strategy Viability Study will determine the Council's position on the scale and location of future development.
The Council is deluding itself that Wirral Waters will deliver. Policy CS20 is not an effective contingency plan. The Council needs to do more and actually undertake a Green Belt review as part of this Local Plan and not wait any longer, as failure to do so will make the Core Strategy unsound.	No change is recommended, at this stage. The forthcoming Strategic Housing Assessment will determine the Council's position in relation to future housing need. The forthcoming Core Strategy Viability Study will determine the Council's position on the scale and location of future development.
There is a need for an immediate Green Belt review. The tests required are unrealistic. If a single dwelling is built at Wirral Waters in the first five years the test cannot be met. If planning permission exists sufficient to demonstrate a five-year supply the test has similarly not been met.	The forthcoming Strategic Housing Assessment will determine the Council's position in relation to future housing need but it is recommended that Policy CS20 is amended to read: "If <u>alternative sites sufficient to provide an ongoing five-year supply to 2023 have no obtained planning permission by 2018</u> , the Council will undertake a review..."
The review of the Green Belt provided for in Policy CS20 would be too late to respond to the existing and likely future significant shortfall in the plan period and will not meet the full and objectively assessed needs for housing over the plan period.	No change is recommended, at this stage. The forthcoming Strategic Housing Assessment will determine the Council's position in relation to future housing need.
The only mechanism to review Green Belt boundaries under Policy CS20 would effectively involve a complete review of the entire Local Plan, which would take a considerable period of time to deliver.	No change is recommended, at this stage. The forthcoming Strategic Housing Assessment will determine the Council's position in relation to future housing need.
If a site no longer performs a Green Belt function it should not have been placed in the Green Belt in the first place. This test could not therefore be met by any site currently in the Green Belt.	Accepted. It is recommended that the second bullet point under Policy CS20 is amended to read: " <u>the site is considered to be the most suitable, taking account of the five purposes of including land within the Green Belt in the National Planning Policy Framework</u> ".
Development in the Green Belt should only occur where good public transport and access by other sustainable modes exists, or can be readily and easily achieved.	No change recommended, as bullet point 4 in Policy CS20 already ensures that sites in the Green Belt are only considered for release if it can be demonstrated that the site "would be well-related to an existing Settlement Area in terms of setting, visual impact, infrastructure, access to services and a choice of means of transport."

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<p>The lead in time for any substantial progress on the residential element of Wirral Waters is likely to be longer than originally envisaged and there is little realistic prospect of an upsurge in development activity within the inner urban areas for the foreseeable future. Sites in these locations are affected by a range of constraints which are expensive to address and there is significantly less public sector funding available to help bring difficult sites forward. This will undoubtedly have a significant effect on Wirral's ability to meet its dwelling targets on brownfield land in the urban areas of east Wirral, and so there is a real possibility that this contingency policy will need to be invoked.</p>	<p>No change is recommended, at this stage. The forthcoming Strategic Housing 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 on the scale and location of future development.</p>
<p>Wirral should consider whether there is the need to leave open the option of an earlier Green Belt review, either for Wirral alone or as part of a wider- sub-regional Green Belt Study.</p>	<p>No change is recommended, at this stage. The forthcoming Strategic Housing Assessment will determine the Council's position in relation to future housing need.</p>
<p>Policy CS20 is very negative and cautious and suggests that the Council is not confident that existing evidence is robust. Rather than provide a contingency policy, the Core Strategy should be informed by a more reliable and up-to-date evidence base and either confirm the requirement for a full Green Belt review or recognise the potential need for greenfield development outside the urban area.</p>	<p>No change is recommended, at this stage. The forthcoming Strategic Housing Assessment will determine the Council's position in relation to future housing need.</p>
<p>Policy CS20 merely delays the inevitable and fails to properly consider this alternative at the correct stage in the plan making process. The strategy proposed within Policy CS20 needs to be undertaken now and not in five years time to provide a clear picture of the potential impact of releasing Green Belt land for development. If this is not done prior to submission the Core Strategy cannot be shown to be "justified" (i.e. the most appropriate strategy when considered against the reasonable alternatives) or "effective" (i.e. deliverable).</p>	<p>No change is recommended, at this stage. The forthcoming Strategic Housing Assessment will determine the Council's position in relation to future housing need.</p>
<p>Policy CS20 may be unnecessary if projected housing numbers are reduced to a more sensible figure and it must not be allowed to over-rule policies to protect the environment. An additional bullet should be added to read: "the proposal is not in conflict with policies to protect the environment and biodiversity (CS30-39)".</p>	<p>No change is recommended, at this stage. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing needs. It is, however, recommended that an additional sentence is added to Policy CS20 to read: "<u>Development proposals will be expected to comply with the requirements of CS42.</u>"</p>
<p>The Green Belt is absolutely sacrosanct. Even land that may be considered "second quality" Green Belt should not be considered, as it acts a defensive barrier to the rest.</p>	<p>No change is recommended, at this stage. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing needs.</p>

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<p>Policy CS20 as currently drafted could be read as if it will only be enacted under two separate scenarios and infers that a handful of houses could be delivered at Wirral Waters and this would be enough to prevent a Green Belt review. Green Belt review will be undertaken under any scenario if there is less than 5 years housing supply in five years' time.</p>	<p>Accepted. It is recommended that Policy CS20 is amended to read: "If <u>alternative sites sufficient to provide an ongoing five-year supply to 2023</u> have no obtained planning permission <u>by 2018</u>, the Council will undertake a review of the Borough's ongoing housing land supply to seek additional developable sites within the existing urban area and then, if sufficient developable sites cannot be identified within the existing urban area, by considering the need to identify sites for housing development within the Green Belt sufficient to maintain an ongoing five year supply of deliverable housing land over the remainder of the plan period to 2028."</p>