

ID	Summary of Issues Raised	Council Response	Changes Proposed
1, 8, 13, 14, 15, 16, 18, 19, 20	9 respondents considered that the assessment methodology was inadequate or insufficiently detailed.	The SHLAA is a high level assessment of the likely potential capacity for new housing development. The level of detail is based on the methodology established by Roger Tym and Partners, approved in July 2010 following consultation in April 2009 and applied to data from 2008, 2011 and 2012. More detailed requirements could only be applied once a more detailed site proposal was available. Responses to detailed points are provided below.	Paragraph 2.6 and footnote 3 have been amended to further clarify the role and status of the SHLAA
	Requests that full consideration be given to biodiversity; geodiversity; landscape character and quality; flood risk; and green infrastructure. Sites important to legally protected species should be excluded unless the developer can show that development will not harm individual animals or the status of the species in the local area. Work on the LCR Ecological Framework should also be taken into account.	The revised methodology already takes account of open space and biodiversity and geodiversity in line with existing policies (Table 3.2 and Table 3.3 and following) and already applies a lower score to sites at greater risk of flooding (Table 3.9). Wider green infrastructure requirements and the consideration of more specific impacts, including the national sequential test to direct development to areas at lower risk of flooding, would need to be applied when a planning application was submitted or when land allocations were being considered as part of a site-specific Local Plan. The Ecological Framework is already identified as a material consideration in the emerging Core Strategy Local Plan.	Paragraph 3.23 has been added to provide additional information on the protection to be given to supported habitats and paragraph 4.6 amended to better reflect the approach towards floodplain and supporting habitats.
	The impact of development on scheduled ancient monuments; historic parks and gardens; listed buildings and conservation areas needs to be considered. Non-designated features of local and historic or architectural interest should also be considered as these can make an important contribution to creating a sense of place.	The methodology already takes account of the potential impact on designated and non-designated heritage assets (Table 3.5 and following). Any more detailed impacts will need to be assessed in line with national policy and the local Development Plan, when a planning application is submitted or when land allocations were being considered as part of a site-specific Local Plan.	No change
	Welcomes the inclusion of the impact on designated recreational open space in revised methodology but would wish to see private and publicly owned playing fields assessed in accordance with paragraph 74 of the National Planning Policy Framework (NPPF).	The revised methodology already seeks to score sites for their likely impact on designated open spaces (Table 3.2 and following). A revised Playing Pitch Strategy is currently being prepared but will only be available for more detailed consideration as part of a future review of the SHLAA.	No change

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	Surprised there is no reference to needs of Gypsies and Travellers' accommodation in the SHLAA. Would be helpful if the SHLAA referenced the Liverpool Region Gypsy and Travellers Accommodation Needs Assessment.	The more particular requirements of Gypsies and Travellers will be considered as part of a separate site-specific assessment, which will be subject to consultation in the New Year. Proposed modifications to the Core Strategy Local Plan to respond to the findings of the Merseyside and West Lancashire Gypsy and Traveller Accommodation Assessment will be published for public comment in December 2014.	No change
	Requests consideration to the protection of landscape character. It would be useful to include a 'suitability' rating to show sites suitable for inclusion in the 0-5, 6-10 and 10+ year supply. A score of '0' against the greenspace and heritage assets criteria is not currently asterixed and therefore can still be included in the first ten year supply but should be considered in same manner as Green Belt, flood risk and nature conservation. The SHLAA should clearly recognise that there may be circumstances where a reduced density would be appropriate, having regard to the character and appearance of the area in question.	Impacts on landscape character and visual amenity could only be properly assessed once a detailed development scheme had been submitted. The final Site Assessment Database will include an overall 'suitability score' which is used to place sites within the 5-year (overall score of 3); 6-10 year (overall score of 2); and 10+ year (overall score of 1). Existing national and local policies do not wholly preclude development related to greenspace or heritage providing certain criteria can be satisfied (paragraph 3.18 and paragraph 3.32 refer). A lower density has already been applied to sites containing an identified heritage asset or protected trees (paragraphs 4.12 and 4.13 refer).	Paragraph 3.11 has been amended to clarify that the asterisk has been used to indicate existing policy priorities.
	The SHLAA needs to consider the conformity of UDP policies with the NPPF and should consider the likely permanence of policies such as Green Belt and not simply discount sites on the basis of current policies. Sites which have been identified as surplus to requirements in an up-to-date open space study or identified as unlikely to continue in employment use in up-to-date Employment Land Review should be included. The Council is correct to apply a cautious approach to density assumptions but 25 dwellings per hectare would be more appropriate. Build-out rates are optimistic. The Council should discuss with companies actively working across the Borough and should consider build-out rates from the past 5 years. Windfall	The methodology has already been revised to take account of changes introduced through the NPPF. The NPPF states that Green Belt sites should not be released unless in exceptional circumstances in a Local Plan and the revised methodology makes provision for previously developed sites in accordance with paragraph 89 of the NPPF (Table 3.1 and paragraph 3.15 refer). A revised Playing Pitch Strategy is currently being prepared but will only be available for more detailed consideration as part of a future review of the SHLAA. The revised methodology already reflects the NPPF priority to support economic growth and NPPF paragraph 22 and all the employment sites put forward through Call for Sites have been considered (Table 3.4 and following refer). The build out rates have been	Paragraph 3.12 has been amended to emphasise that sites have been assessed against national policy Table 4.3 has been amended to clarify construction rates in line with the Viability Study Baseline Report Paragraph 5.7, on windfalls, has been

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	sites, including conversions and changes of use, should not be included in the supply but should instead be included as a buffer.	informed by discussions with local developers, including two stakeholder workshops in June and September 2013 (paragraph 3.64 refers) but the suggested density will be passed to the Council's consultants for consideration as part of the final Viability Study report. Land supply calculations are included in the Council's statutory Monitoring Report. The Council has included windfall sites in the first five years, at a rate of 50 units per year based on actual permissions granted between 2008 and 2014. The Council has also included conversions and changes of use at a rate of 75 units per annum based on median delivery between 2003 and 2014. Conversions and changes of use with planning permission have not been included, to avoid double-counting. A density of 30 dwellings per hectare has been retained as this reflects the average density of extant new build planning permissions at April 2013.	updated to April 2014 Section 4 of the final Wirral SHLAA Update 2014 Main Report now sets out the position with regard to the consideration of Green Belt sites
	The SHLAA needs to consider the conformity of UDP policies with the current context set out within the NPPF. The proposed methodology in the SHLAA will result in potential Green Belt sites which are suitable and sustainable not being identified as deliverable within the SHLAA. Applying a score of '0' to those sites greater than 600m from an existing centre or high frequency public transport corridor is overly restrictive and is not in accordance with the IHT Guidance 'Guidelines for Journeys on Foot' which sets out a distance of 800m. Proposed build-out rates are too high as completion rates average around 30 dwellings per annum and 60 dwellings per annum for sites of more than 200 units.	The methodology has already been revised to take account of changes introduced through the NPPF. The NPPF states that Green Belt sites should not be released unless in exceptional circumstances in a Local Plan and the revised methodology makes provision for previously developed in accordance with paragraph 89 of the NPPF (Table 3.1 and paragraph 3.15 refer). The accessibility criteria (Table 3.11 refers) directly reflect the Broad Spatial Strategy contained within the Proposed Submission Draft Core Strategy Local Plan, which seeks to direct development to the most sustainable locations. The build out rates included in Table 4.3 have been informed by discussions with local developers, including two stakeholder workshops in June and September 2013 (paragraphs 3.63 and 3.64 refer). The revised information will however be passed to the Council's consultants for consideration as part of the part of the final Viability Study report.	Paragraph 3.12 has been amended to emphasise that sites have been assessed against national policy Section 4 of the final Wirral SHLAA Update 2014 Main Report now sets out the position with regard to the consideration of Green Belt sites

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	<p>The Council's AMR 2013 shows that actual housing completions have been much lower than the RSS requirement. An additional buffer of 20% should be applied and an immediate Green Belt review should be undertaken to deliver an ongoing five year supply of deliverable sites. The Council should avoid the long-term protection of employment sites where there is no reasonable prospect of the site being used for this purpose. Build-out rates should be based on the past five years and should equate to 30 dwellings per annum. As the Council is not applying a minimum size threshold, it should be cautious when including windfalls.</p>	<p>RSS was revoked in May 2013. The Council's land supply calculations are set out in the Council's Monitoring Reports, which include a 20% buffer. A revised SHMA, based on the latest household projections, will determine whether there is sufficient land to meet any new housing requirements, to be established through the Core Strategy Local Plan. The revised methodology reflects the NPPF priority to support economic growth and already reflects NPPF paragraph 22 (Table 3.4 and following refer), which will need to be considered when a planning application is submitted (paragraph 3.26 and 3.28 refer). Build out rates reflect discussions with local developers, including two stakeholder workshops in June and September 2013 (paragraph 3.64 refers) but the suggested density will be passed to the Council's consultants for consideration as part of the final Viability Study report. The allowance for windfalls is based on permissions granted between 2008 and 2014.</p>	<p>Paragraphs 5.5, 5.8 and 5.13 have been amended to clarify the role of the Council's statutory Monitoring Reports</p> <p>Paragraph 5.12 has been amended to clarify how any potential shortfall against objectively assessed needs will be addressed</p> <p>Section 4 of the final Wirral SHLAA Update 2014 Main Report now sets out the position with regard to the consideration of Green Belt sites</p>
	<p>The SHLAA needs to consider the conformity of UDP policies with the current context set out within the NPPF. Scoring fails to assess sites within the Green Belt outside an Infill Village or on a Major Developed Sites, which no longer meet the purposes of including land within the Green Belt. The Council needs to undertake a Green Belt review. The Council's delivery strategies for housing and employment are not realistic due to an over-reliance on Wirral Waters. The Council will need to consider alternative strategies, if this scenario fails. Object to the heritage criterion, as it unclear how it can be demonstrated that development can be achieved without causing harm to a heritage asset. Object to directing new development to areas</p>	<p>The methodology has already been revised to take account of changes introduced through the NPPF. The NPPF states that Green Belt sites should not be released unless in exceptional circumstances in a Local Plan. A revised SHMA, based on the latest household projections, will determine whether there is sufficient land to meet any new housing and employment requirements, to be established through the Core Strategy Local Plan. The high-level criteria for heritage score sites on the proximity of recognised assets (Table 3.5). Detailed impacts would need to be assessed as part of a planning application, before development could be permitted. The accessibility criteria (Table 3.11 refers) directly reflect the Broad Spatial Strategy contained within the Proposed Submission Draft</p>	<p>Section 4 of the final Wirral SHLAA Update 2014 Main Report now sets out the position with regard to the consideration of Green Belt site</p> <p>Paragraph 3.65 has been added to provide further information on the Viability Study</p>

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	within 400m walking distance of an existing centre or high frequency public transport corridor as it is inappropriate to apply a rigid checklist to assess sustainability. The criteria set out in the NPPF should be applied. The profit on Gross Development Value should be nearer 20%.	Core Strategy Local Plan, which seeks to direct development to the most sustainable locations. The figures for development surplus reflect the findings of the Council's Viability Study, based on stakeholder workshops held in June and September 2013 (paragraph 3.64 refers). 15% profit has been applied below 25 units, with 20% for larger schemes.	
4, 5, 6, 7, 9, 11, 12, 17	8 respondents did not have any specific comments in relation to the SHLAA but wished to be kept informed of future consultations.		
	Supports the exclusion of sites in Flood Zone 3b. Development should be directed away from areas of highest risk of flooding. Where development is necessary, development should be made safe without increasing flood risk elsewhere.	Support noted. Flood risk will continue to be assessed, in detail, when a planning application is submitted and/or through a site-specific Local Plan, in line with the Core Strategy Local Plan.	No change
	No specific comment to make but would emphasise the need to take cross country pipelines into consideration when assessing sites for development.	Pipelines would be considered as a ground condition constraint under Table 3.8 of the methodology.	No change
	Requests full consideration for biodiversity; geodiversity; landscape character and quality; green infrastructure; access to the countryside and other open space; and impacts on National Trails and networks of public rights of way.	The revised methodology already takes account of open space and biodiversity and geodiversity in line with existing policies (Table 3.2 and Table 3.3 and following). Wider, more detailed, requirements will need to be assessed when a planning application is submitted, in line with national and local policies.	No change
	The Marine Policy Statement provides guidance on planning activity that includes a section of coastline or river.	Any specific impacts will need to be assessed when a planning application is submitted and/or through a site-specific Local Plan. The Core Strategy has already been amended to draw attention to the Marine Policy Statement.	No change
	Wishes to be kept informed of any future proposals which may impact on the current rail network.	Respondent will continue to be informed of future consultations, as part of the Council's mailing list and in line with Schedule 5 of the Town and Country Planning (Development Management Procedure) (England) Order 2010.	No change

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	Developments resulting in a material increase or significant change in the character of traffic using a rail crossing should be refused, unless it can be demonstrated that safety will not be compromised.	Any specific impacts will need to be assessed when a planning application is submitted and/or through a site-specific Local Plan. Core Strategy Policy CS40 – Transport Requirements, already includes appropriate wording.	No change
	Respondent requests to be informed of any development within 100m of the railway.	There is no statutory requirement to inform the respondent of any development within 100m of the railway. The response has, however, been forwarded to the Council's Development Management Section for further consideration	No change
	No comments to submit at this time but wishes to be consulted in future.	Respondent will continue to be informed of future consultations, as part of the Council's mailing list.	No change
3	1 respondent questioned the value of undertaking a SHLAA		
	The SHLAA is unnecessary and bureaucratic. Wirral is already overpopulated and does not need more housing.	The SHLAA is an evidence base document required by national policy. The future housing requirement, to be included in the Core Strategy Local Plan, will be based on an objective assessment of housing need, in line with national policy.	No change
2, 10	2 respondents commented on the use of empty properties and the availability of land to self-builders.		
	Potential land for housebuilding should be available to self-builders rather than falling into the hands of the large developers	Land transactions on privately owned land are outside the control of the Council. The Government is currently consulting on proposals to introduce a requirement for Councils to identify land for custom build and to offer prospective custom builders a plot of land at market value. Consultation closes on 18th December 2014 but the proposals will not be available for inclusion in this current SHLAA.	No change
	Empty properties should be included in the housing land supply. Two properties in Bebington were built in 2000 but remain unoccupied.	The 'Housing and Economic Land Availability Assessment' Planning Practice Guidance states that local authorities may include an allowance for empty homes in their housing land supply if robustly justified. The Council seeks to bring empty properties back into use through its Housing and Empty Property strategies. The Council's forthcoming Strategic Housing Market Assessment will include an allowance for empty properties in its assessment of future housing need.	Section 5 of the final Wirral SHLAA Update 2014 Main Report now sets out the position with regard to empty properties

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Officer change	A drafting error has been corrected in the overall scoring for suitability in paragraph 3.52. The scores should read '55' (not '50') for 11 criteria (not '10'); '38' should read '42'; '27-38' should read '30-42'; and '27' should read '30', to reflect the changes made elsewhere within the revised methodology (as originally published).		Paragraph 3.52 has been amended
Officer change	The wording relating to previously developed sites in the Green Belt in Table 3.1 has been amended to better reflect paragraph 89 of the NPPF, which would need to be re-tested once a detailed scheme has been submitted.		Criterion 3 in Table 3.1 has been amended
Officer change	Table 4.2 (formerly Table 2) has been amended to more accurately reflect the gross to net ratios included in the Viability Study, by deleting the references to ratios for sites above 10ha (70%) and 50ha (50%).		Table 4.2 has been amended
Officer change	An additional field has been included in Table 3.15, to provide greater clarity on the scoring of sites with planning permission, to include sites with planning permission that are not developable within a ten year period.		Table 3.15 has been amended