

**Wallace Land**

**West Kirby**




**Representations to  
SHMA and SHLAA**

**September 2016**

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## Signing off Sheet

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**Authorised for and on behalf NJL Consulting**



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## 1.0 Introduction

- 1.1 These representations have been prepared by NJL Consulting on behalf of Wallace Land in response to the consultation on the need for additional housing in Wirral and on the Council's assessment of the land that may be available to accommodate this.
- 1.2 The representations have duly considered the Wirral Strategic Housing Market Assessment and Housing Needs Study (SHMA, May 2016) and the Wirral Strategic Housing Land Availability Assessment (SHLAA, May 2016).
- 1.3 Wallace Land have an interest in land at West Kirby. The site is currently located within the Green Belt, but is considered suitable for development and is available immediately to provide new homes.
- 1.4 It should be noted that NJL have previously made general representations to Wirral Council in relation to the SHLAA Methodology.
- 1.5 The representations submitted herein have been structured to reflect the questions identified by Wirral Council within the consultation. The document is set out as follows:
  - Section 2 provides a summary of the representations made previously by NJL relating to the methodology;
  - Section 3 provides representations in relation to Q1 raised: *'Do you agree with the analysis contained within the Wirral Strategic Housing Market Assessment (SHMA, May 2016)? Is there anything else that you think should be taken into account?'*;
  - Q2 is answered in Section 4, which asks: *'Do you agree with the range of 'objectively assessed need' identified (pages 8 and 9 and section 8.0 of the SHMA, May 2016 refer)? How much extra housing do you believe is needed to accommodate future economic growth?'*;
  - A response to Q3 is provided in Section 5, the question being: *'Do you agree with the assessment of the housing land supply contained within the Wirral Strategic Housing Land Availability Assessment (April 2016)?'*;
  - Section 6 responds to Q4: *'Are there any other sites that you think could be used to provide for additional housing in Wirral?'*

## 2.0 Background

- 2.1 Representations were previously made by NJL in February 2014 in response to the revised methodology for the Strategic Housing Land Availability Assessment (SHLAA) Update 2014 consultation.
- 2.2 At that time our representations, whilst expressing general support, did identify a number of specific concerns in relation to the detail of the methodology which it was considered required further deliberation in advance of the SHLAA being progressed.
- 2.3 The main points raised within the representations submitted in 2014 were as follows:
- Reliance on out-of-date policies – the methodology was inconsistent when referencing local planning policies, acknowledging that it is inappropriate to base the suitability of a site on out of date policies contained within the UDP, but then seemingly relying on these elsewhere within the methodology.
  - Treatment of Green Belt sites – lack of flexibility provided to allow for potential Green Belt amendments to be made through the development plan process.
  - Transport accessibility – the restrictive assessment was not in accordance with the Institution of Highways and Transportation guidance and the distances considered acceptable for journeys on foot.
  - Proposed build-out rates – the rates assumed within the methodology are considered to be too high and far from achievable.

## 3.0 Response to Question 1

### **Do you agree with the analysis contained within the Wirral Strategic Housing Market Assessment (SHMA, May 2016)? Is there anything else that you think should be taken into account?**

- 3.1 The analysis provided by NLP within the Strategic Housing Market Assessment (May 2016) is relatively comprehensive and has considered a wide range of factors which could influence housing need and the housing market in Wirral.
- 3.2 On the whole, NLP have assessed the housing need of the Borough against relevant factors, which has ensured that the needs of the population of Wirral will be appropriately addressed. However, it is considered that the geographical context of the Borough could have been considered more when assessing how the current need has come about and how this may influence addressing the need in the future.

### **Geographical Context**

- 3.3 Wirral is relatively constrained by its coastal location, large areas of Green Belt and environmental designations. However, there has been very little consideration of these factors within the SHMA, and how these may have influenced past housing figures.
- 3.4 At paragraph 2.36 the SHMA states that the analysis undertaken has been done so with the '*geography of the Borough*' in mind. However, the extent to which this has been the case is questioned.
- 3.5 The '*Challenges*' faced by the Borough are set out within Section 5, and paragraph 5.5 identifies that a '*significant proportion of the rural land in the Borough is designated as Green Belt*', however, the report does not go far enough to detail how this impacts upon housing need and availability in Wirral.
- 3.6 Paragraph 5.5 confirms that a significant proportion of the rural land within the Borough is designated as Green Belt, and that the emerging Core Strategy places a strong emphasis on retaining this. This aspiration is acknowledged, however, there must be a degree of practicality when considering the retention of Green Belt land against the requirement for new homes and the restrictions of the location of these to reflect local need and address existing issues within the current housing market.

Consideration should be given to the level of affordability within some areas, and the availability of a range of suitable homes to address the population's needs and different stages of life, and how the geography of the area will influence this.

- 3.7 The SHMA identifies 8 Settlement Areas, however further to this identification there appears to have been little consideration given to the geography and potential constraints which may exist within each area and how this may have influenced and unnaturally distorted past housing figures. There is no consideration as to how this could be addressed in the future to ensure need is met effectively.
- 3.8 Paragraph 12.78 confirms a low level of development has taken place outside the towns within the Borough due to the restrictions imposed by the Green Belt, however there is no further analysis of this matter.
- 3.9 Due to the geographical restrictions of the Borough it will be necessary to consider sites within the Green Belt to ensure a sufficient number of homes can be provided during the plan period. Therefore, a Green Belt Review will be required, this will identify the most appropriate locations for release. Without such release the identified housing need will not be met and the housing shortage and need for affordable homes will become more acute.
- 3.10 The release of Green Belt land is discussed further within Section 6 of these representations.

## 4.0 Response to Question 2

### **Do you agree with the range of ‘objectively assessed need’ identified (pages 8 and 9 and section 8.0 of the SHMA, May 2016 refer)? How much extra housing do you believe is needed to accommodate future economic growth?**

- 4.1 The OAN within the SHMA has given due consideration to a wide range of factors which can affect the need for new homes within an authoritative boundary.
- 4.2 The calculation of the OAN was undertaken through a series of assumptions, adjustments and sensitivities applied to consider local factors and economic aspirations, these are assessed below in turn.

#### **Demographic Needs**

- 4.3 The SHMA uses the 2012-based Sub-National Household Projections (SNHP), it is acknowledged that this is a suitable starting point when assessing the OAN within the Borough. This indicated a need for 685 dpa during the plan period.
- 4.4 It is important to note that since the publication of the SHMA by NLP in May 2016 more recent household projection figures have been released – 2014-based SNHP (published July 2016). The 2014-based figures show a slight increase in the number of households projected for Wirral by the end of the plan period in 2032 and beyond this to 2037. The more recent figures project an additional 1,000 households within Wirral by 2032 and 2037 than was projected within the 2012-based figures.
- 4.5 It is recognised that this increase is not significant and would not result in a significant change to the OAN for the Borough, however, it would be prudent for the publication of these figures to be acknowledged and referenced within the SHMA to ensure the most up-to-date evidence is included to ensure the most robust assessment possible.
- 4.6 At paragraph 8.5 the SHMA confirmed that a *‘suitable adjustment to accelerate the headship rates for younger households under Scenario Ai’* should be applied. This approach is supported. Scenario Ai acknowledges that the 2012-based SNHP presented lower headship rates among the younger age groups, and that this was due to the recession which had been experienced in recent years and the impact this had had on, not only the supply of housing, but also the ability of such households to form. As such, it was considered that the 2008-based projections (which were higher



than the 2012-based figures) provided a better reflection of the formation of households within this age group.

- 4.7 This is considered to be an appropriate approach to the matter and therefore, the increased figure of 757 dpa proposed to represent the demographic-led need and to provide the baseline is considered acceptable.
- 4.8 The SHMA identifies that long-term migration rates suggest a much lower level of growth within the Borough, however NLP dispute this through their analysis, and instead suggest that future trends are likely to be higher, due to the continued growth of Liverpool City and errors within the 2001 Census.
- 4.9 Therefore, rather than looking at the long-term migration trends, which NJL would usually advocate, NLP suggest that more weight is attached to the 2012-based SNHP, a response which is supported by NJL in this instance.

## Summary

- 4.10 Therefore, the proposed demographic-led baseline for Wirral's OAN of 795 dpa is supported, and is considered to provide an appropriate starting point for the OAN.

## Market Signals

- 4.11 The SHMA identifies that an upward adjustment to the demographic baseline scenario is considered reasonable to respond to market signals. This is due to the fact that Wirral has seen the greatest increase in house prices of any local comparators, and additionally, the Borough has seen a high rate of change in its affordability ratio.
- 4.12 The adjustment to the need should be '*reasonable*' when assessed against the affordability constraints, and therefore in this instance NLP consider that the level of uplift required should be '*moderate*'. This is considered to reflect the fact that Wirral is identified as being '*relatively low risk in terms of most market indicators*'.
- 4.13 In order to direct the level of uplift to apply to the demographic need, NLP looked towards recent Inspector's reports on Local Plan EiPs. In both instances, Inspectors considered that an uplift of 10% should be applied. This level of increase is supported by NJL.
- 4.14 However, NLP carried out further assessment, as recommended by the Local Plan Expert Group, which standardised the appraisal of market signals and the extent of any uplift; this looked at the market indicators of house price affordability and rental

affordability. Research found that the calculation of each of these ratios within Wirral suggests that no market signal uplift would be required.

- 4.15 NLP took a pragmatic view, determining that as the ratios for both the house price affordability and the rental affordability were only just below the figure where a 10% uplift would have been applied, it would be appropriate to apply a modest uplift of 5% to the demographic projections.
- 4.16 The approach taken by NLP, which NJL consider fitting in this case, equates to a revised figure of 795 dpa for the plan period.

## Summary

- 4.17 As has been set out above, due to the marginal figures in the ratios identified, NJL support the application of a 5% uplift by NLP. This will ensure that the exclusion of market signals within the area will not result in an inferior OAN being calculated which would not address the housing needs of the population.

## Economic/Employment Trend

- 4.18 The SHMA confirms that economic forecasts for Wirral indicate additional housing is required above the demographic growth figure to meet future growth potential if existing commuting patterns remain as they currently are. In fact, Scenario Ai (757 dpa) would result in a decline in labour supply and could see a reduction in the number of jobs that could be supported by 2,085 by 2032; in order to maintain the number of jobs over the plan period at least 790 dpa are required.
- 4.19 However, this is clearly not an aspirational position for the Council and instead it should be seeking to increase the number of jobs it can support.
- 4.20 A forecast provided by Experian, as referenced within the SHMA, predicted an optimistic level of jobs growth (despite past trends of decline and job stabilisation), with a growth of 7,730 jobs to 2032 predicted.
- 4.21 It is recognised that a considerable level of in-migration will be required to support such growth in job numbers, and therefore the housing numbers must reflect this to ensure the Borough can achieve its full potential.
- 4.22 The projected jobs growth leads to a housing need of 1,233 dpa.

- 4.23 The SHMA does acknowledge that such a jobs growth would be a '*step-change*' in Wirral's economic fortunes, however it is considered that such an outcome is aspirational for the Borough and should be pushed for by the Council.
- 4.24 The SHMA confirms that projections provided within a forecast by Oxford Economics (OE) suggest that the Borough will see a decline of around 5,500 jobs in the plan period. However, the period of time covered by the assessment (1997-2014) included unprecedented recession levels and a period of economic stagnation. The period assessed does not provide an accurate representation of the economic situation in Wirral.
- 4.25 OE also projected figures based on a 'policy-on' approach, which were based on a number of high profile projects, which would result in a growth of 8,800 jobs. It cannot be guaranteed that these scheme will come forward exactly as predicted, and as such, reliance should not be placed on the projects to produce such growth figures in Wirral.
- 4.26 NJL agree with the approach taken by NLP that the weight to be attached to either forecast provided by OE is limited.

## Summary

- 4.27 The proposed figure of 1,233 dpa to support an increase number of jobs within Wirral is considered to be the most appropriate, as this will ensure that sufficient homes are provided to support the proposed economic growth, to an aspirational level, whilst also ensuring the figure is achievable in the Borough.

## Affordable Housing

- 4.28 NLP correctly refer to the recent High Court judgement Satnam Millennium Ltd vs Warrington Borough Council, which confirmed that affordable housing needs should be considered when calculating the OAN for an area.
- 4.29 Section 10 of the SHMA confirms that the affordable housing need in Wirral is for between 984 and 1,034 dpa.
- 4.30 Therefore, if 40% of new homes are to be provided as affordable (1,034 dpa), this gives a total annual requirement for 2,585 dwellings (the full affordable housing OAN).
- 4.31 Due to the high number of homes which would be required per annum to meet this level of growth, this is considered by NLP to be unlikely to be achieved. As such, an

additional 10% uplift to the figure of 795 dpa (demographic plus market signals) is proposed to go some way to addressing the affordable housing need, taking the OAN to 874 dpa.

## Summary

- 4.32 It is not considered that the addition of 10% to the market signals amended figure is appropriate. This does not address the affordable requirement in Wirral and ignores other factors which have been assessed as contributing to the need for homes in the Borough, such as economic and employment trends.

## Conclusions

- 4.33 Overall in the approach taken by NLP is supported and seeks to positively address the housing needs of the Borough. The assessment of each of the contributing factors is, on the whole supported, and if followed through would provide a robust OAN on which Wirral's housing requirement could be set.
- 4.34 However, the inability of the OAN to effectively respond to the affordable housing need is not appropriate and will result in a further shortage of affordable homes for the population.
- 4.35 The SHMA concludes that the resultant housing OAN would be in the order of 874 dpa – 1,233 dpa to 2032 and 855 dpa – 1,183 dpa to 2037.
- 4.36 If the lower OAN or close to this is considered appropriate to be progressed by the Council, this will not represent the full objectively assessed need of Wirral. This number of new homes per annum will fail to respond to the economic and employment trends which have been predicted for the plan period and as such will result in a Local Plan which is not aspirational, does not promote growth within the area and does not provide positively for the needs and potential of Wirral and its population.
- 4.37 An OAN closer to the higher figure of 1,233 dpa is the most appropriate for Wirral and this is supported by a number of evidence documents referenced within the report, which, to ignore will result in an unsound OAN being progressed.

## 5.0 Response to Question 3

### **Do you agree with the assessment of the housing land supply contained within the Wirral Strategic Housing Land Availability Assessment (April 2016)?**

#### **Methodology**

- 5.1 The SHLAA Methodology confirms that all sites included in the SHLAA 2015 will be reassessed in line with the revised methodology, alongside all new sites submitted for consideration. This approach is supported and will ensure a consistent approach to sites with the same base date of assessment.

#### **‘Suitability’ Criteria**

- 5.2 It is stated at paragraph 3.10 that in order to assess a site’s suitability it will be assessed against a number of criteria and given a score against each criterion. On the whole this approach is considered appropriate, as this will allow the Council to determine the most suitable sites and for these to progress ahead of less suitable locations (depending on site availability and developability).
- 5.3 However, concern is raised regarding the proposed approach at paragraph 3.11, which states that for criteria considered to be of the greatest importance, if a site scores ‘0’ against this (the lowest score) then its overall maximum suitability score will be ‘1’, irrespective of its scoring against other criteria.
- 5.4 One of the criteria considered of most importance is its Impact on the Adopted Green Belt, as well as Impact on Flood Risk and Impact on Nature and Earth Science Conservation Areas. It is acknowledged that the SHLAA must have a way of categorising sites and distinguishing between their ‘suitability’, however to restrict an overall score based upon one criteria seems harsh and ineffective, as in some cases these factors could be easily overcome or addressed to limit the impact.
- 5.5 For instance, some sites may be considered as a whole to have a considerable impact on the Green Belt or other designation, but if the site has no significant non-Green Belt issues and were to be released for development the impact would be for less significant or negligible and would positively identify a site to address housing need.

- 5.6 Equally it could be the case that through mitigating measures such impact could be sufficiently reduced to a level to allow the site to be considered suitable for development, but there appears to be no allowance for such considerations.
- 5.7 It is therefore requested that a greater degree in flexibility is incorporated into the SHLAA methodology to ensure that all potential sites are fully and fairly considered. Such restrictive criteria could result in fewer available and developable sites coming forward for development, thereby hindering development in the Borough to a level not appropriate to meet the identified needs.

## Stage 2 – Site/Broad Locations Assessment

- 5.8 Stage 2 of the methodology states that following the sites being assessed on their suitability, availability and achievability, they will be placed into one of three categories, depending on when they could be delivered (within 5 years; 6-10 years; or 11-15 years). This approach is on the whole supported.
- 5.9 It is acknowledged that the SHLAA cannot release sites from the Green Belt, without a Green Belt Review having first taken place, therefore meaning that greenfield Green Belt sites could not be included within any of the identified categories.
- 5.10 However, the decision by Wirral Council to place all greenfield Green Belts sites into a single category, irrespective of site variances is not supported.
- 5.11 In order to ensure that a full, robust and sound assessment is carried out it is recommended that greenfield Green Belt sites are also categorised. Sites which do not fulfil the purposes of the Green Belt and which could, in the future, contribute to the housing need of the Borough, whilst also providing defensible boundaries to prevent further encroachment into the Green Belt should be identified together. These site could come forward for development following a full Green Belt Review.
- 5.12 The statement within the Main Report of the SHLAA (paragraph 5.18), which confirms that the categorisation of sites only provides an indication of the Council's current assessment of 'likely deliverability' and the 'potential timing of the site's development', is supported. As the report confirms, assessment can only be carried out based upon '*the best available evidence available at the time*', and this can refer to sites becoming available that previously were not, or to sites which previously were available, but are no longer.
- 5.13 This acknowledges that the situation of sites can alter within a short space of time and therefore regular updates (annually) of the SHLAA should be undertaken to

ensure the most up-to-date evidence is available for sites. It is therefore considered that the proposed categorisation of greenfield Green Belt sites will ensure that all available up-to-date information has been fully assessed and incorporated into the results.

- 5.14 It is considered that such a category should contain Wallace Land's site, and the reasons for this are set out within Section 6 of these representations.

## Stage 4 – Assessment Review

- 5.15 The proposed approach discussed within paragraph 5.11 is supported. This states that if insufficient sites are identified to meet the OAN the SHLAA will be reviewed to *'review constrained sites to assess whether such considerations could be overcome more quickly to bring the site forward sooner'*. This proposed approach is supported, and would ensure that the needs of Wirral are met.
- 5.16 However, concern is raised for the lack of mechanism in place to determine at what stage or what level of insufficiency this review will take place and the way in which this will be conducted. For instance, there is no detail as to what level of undersupply would trigger such a review. Nor is there detail as to whether the Council will undertake this themselves, in conjunction with an external consultant, or whether an external consultant will lead on the review. Further consideration has not been given to the level of information required to demonstrate that the site may be able to be progressed sooner and how this should be presented to provide a greater level of certainty that a site would come forward.
- 5.17 Without confirmation of how a review would take place there is a risk that this would not be executed and therefore insufficient sites would come forward to address the need. In this respect it is requested that this further detail be provided within the SHLAA.

## Planning Policy

- 5.18 There appears to be a degree of inconsistency within the SHLAA regarding the local planning policies against which sites and forthcoming development should be assessed.
- 5.19 NJL addressed within previous representations the reliance being placed upon out-of-date policies, in the assessment of sites. Previous representations by NJL drew attention to the fact that following a 12-month period from the NPPF's adoption, it

states that weight should be given to local policies in accordance with their degree of consistency with it.

- 5.20 It appears, within the most recent Methodology, that these comments have not been taken into consideration, as the report still assesses sites against policies contained within the UDP throughout Section 3.
- 5.21 However elsewhere within the Methodology, including with Section 3 itself at paragraph 3.27, reference is made to the Proposed Submission Draft Core Strategy Local Plan and the commitment within this to economic development within certain areas of the Borough.
- 5.22 Irrespective of the local policies against which the Council consider it appropriate to assess sites against, the inconsistency demonstrates a weakness in the methodology and the subsequent categorisation of sites. The policies against which sites are assessed should remain consistent to ensure robustness in the results.



## 6.0 Response to Question 4

### Are there any other sites that you think could be used to provide for additional housing in Wirral?

#### Green Belt locations

- 6.1 As the plan period progresses Wirral Council will struggle to identify sufficient sites outside the Green Belt to address the housing needs of the Borough due to the constraints discussed previously and the lack of availability of such sites.
- 6.2 This is further supported by *Local Plans Report to the Communities Secretary and to the Minister of Housing and Planning* (March 2016) which recommends that '*local plans should be required not only to demonstrate a five year land supply but also focus on ensuring a more effective supply of developable land for the medium to long term (over the whole plan period), plus make provision for, and provide a mechanism for the release of, developable Reserve Sites equivalent to 20% of their housing requirement, as far as is consistent with the policies set out in the NPPF. Reserve Sites represent land that can be brought forward to respond to changes in circumstances*'.
- 6.3 It is clear therefore that if Wirral Council are to demonstrate an ability to meet their housing needs over the plan period, with an additional 20% Reserve Sites, the SHLAA must consider a significant number of further sites.
- 6.4 In response to the previous consultation a number of consultees commented that a Green Belt review should be undertaken. Although NJL's consultation response didn't explicitly state that one should be undertaken, it was stated that flexibility should be contained within the SHLAA to allow for a Green Belt review be undertaken by Wirral Council.
- 6.5 It is acknowledged that Section 4 of the Main Report confirms that Green Belt sites can only be released for development in an adopted Local Plan, following a formal review of the Green Belt as a whole. This is not disputed, as this accurately reflects paragraphs 84 and 85 of the NPPF, however, it may be more appropriate to consider sites put forward within the Green Belt on their own merits irrespective of their Green Belt location, before they are dismissed from the SHLAA. Clearly the identification of sites within the SHLAA does not guarantee a planning permission, as sites still need

to go through a process of consideration against relevant national and local planning policies. Instead, this would allow a degree of flexibility within the SHLAA should a Green Belt review be undertaken.

- 6.6 Notwithstanding the above, and our previous representations (which neither promoted nor opposed the undertaking of a Green Belt review), we now consider that a Green Belt review should be undertaken in Wirral. A Green Belt Review will allow for sites to be considered for release to allow development to take place to meet the needs of the Borough.
- 6.7 Wallace Land's site is considered appropriate for release for residential development.

### Land at West Kirby

- 6.8 The site is located adjacent to the settlement of West Kirby, off Saughall Massie Road and immediately north of Hilbre High School. The site is greenfield and comprises agricultural land, with no public access available. The site is dissected by Saughall Massie Road, bound to the east by China Farm Lane and to the north/west by further agricultural land and residential development within West Kirby. The Green Belt extends to the north and east of the site.
- 6.9 The site is a logical option for release from the Green Belt to allow residential development to take place in a sustainable and suitable location to the north of West Kirby.
- 6.10 The NPPF identifies that the Green Belt serves five purposes and sites within the Green Belt contribute to these. However, it is not considered that our client's site does contribute to the five purposes, and the reasons are as follows:
- **To check the unrestricted sprawl of large built-up areas** – the site represents an opportunity for the release of land for some development close to West Kirby by way of an extension of the settlement to the north, without any significant detrimental impact on the area.
  - **To prevent neighbouring towns merging into one another** – the development of this site will not result in the merging of West Kirby into another settlement, the site does not separate two settlements and so does not currently fulfil this purpose of the Green Belt.
  - **To assist in safeguarding the countryside from encroachment** – the site is well contained by the existing road network, creating defensible boundaries

in each direction. Moreover, potential recreational uses to the north west of the site would further contain this release of land for housing. Given the scale of the proposed site any potential mitigation needed to assist in defining new robust boundaries for the settlement could be accommodated within the site, ensuring that the development would not adversely impact this purpose of the wider Green Belt.

- **To preserve the setting and special character of historic towns** – the site is not located within the proximity of an historic town, and therefore, does not fulfil this purpose.
- **To assist in urban regeneration, by encouraging the recycling of derelict and other urban land** – clearly at present the site does contribute towards this purpose, and it is acknowledged that its development would not. However, the development of the site would assist in meeting the needs of the Borough which cannot be met on existing derelict and urban land and as such alternative sites must be sought.

6.11 The above demonstrates that the site does not fulfil the five purposes of the Green Belt and should therefore be considered for release to ensure that the most appropriate Green Belt sites come forward, to continue the protection of the Green Belt in its most appropriate locations and to ensure the needs of the Borough are met during the plan period.

6.12 Appendix 1 provides a red edge plan indicating the extent of the site proposed.

6.13 Our client is dedicated to bringing this site forward for residential development to address the housing needs of the Borough within an area where affordability and availability of homes has been identified as an issue.

## Appendix 1: Site Location Plan

West Kirby, Wirral.



For Identification Purposes Only