

**The Heswall Society Comments on:
H6 Exploring the computation of housing need in Wirral**

1 Report Critique

This Report by Liverpool University (LU) is considered poor for several reasons as detailed below:

- 1.1. In considering only the 'standard method' (SM) variables and comparing them across Local Authorities (LAs), the whole spectrum of other factors (disparity, deprivation, local official data, geography, social and economic matters, etc.) which make the situation on Wirral 'exceptional' have not been taken into account and have been totally ignored. 'Exceptional circumstances' is not a defined term and certainly not restricted to SM variables by NPPF2019 or case law.
- 1.2. Several of the arguments made are assertions without substantiation and arguments supportive of the main conclusion are given much more weight than just as valid arguments against thus giving an impression of preconception.
- 1.3. The soundness of the Report is called into question through a number of casual errorsⁱ which puts into further question the professionalism of the report it. Is surprising that the Council has allowed such an obviously flawed Report (which supports the Council's stance) to be issued in their name.
- 1.4. The Report touches upon the earlier University Reports' findings but gives no weight to their general conclusion that Wirral's real 'Housing Need' figure is nearer 3,000 than 12,000 – a truly 'exceptional' fact and 'circumstance', a degree of disparity that constitutes a valid and clear 'exceptional circumstance'.
- 1.5. Though the facts are downplayed, the LU Report itself does confirm that there is an insufficient population increase (from all sources – recent past, current and/or projected) to justify a 'Housing Need' of 12,000 additional homes to the "already high absolute and relative Housing Stock". From the Report's own data, the maximum annual 'need' is between 500 and 575 pa and NOT 800pa, when following the 'standard method' and most reliable data inputs.

In conclusion, the latest Report by Liverpool University does not consider sufficient factors to reach the 'sound' conclusion that there are no 'exceptional local circumstances' to adopt an alternative approach to calculating actual 'Housing Need'. Further, the Report is not even considered 'sound' or definitive within the narrow remit of just considering variables involved in the 'standard method' and comparisons with other LAs.

2. Actual Housing Need

- 2.1. A recent letter, sent on behalf of the Rt Hon Robert Jenrick MP, SoS for MHCLG, reiterates (yet again) that, "The Government does not require councils to provide more houses than are needed, but we do expect them to understand and plan to meet this need and ensure that local communities get the houses they need in the right place and at the right time."

- 2.2. From its own data and studies, Wirral has no shortage of dwellings overall. The LU Report acknowledges this fact but does not comment on this or that Wirral does have an unsatisfactory composition housing stock including a shortage of smaller homes and ground floor accommodation for the elderly, those with low-level physical and mental disability, those wishing to downsize, and those wishing to get on the 'housing ladder' (starter homes).
- 2.3. There appears to be a lack of attention to the practical question of where the people are going to come from to fill the Council's proposed housing need of 12,000 dwelling. Based on housing type, e.g. house - 1,2 3 or 4 bedrooms, etc. and extrapolating such data and based on the minimum occupation levels, e.g. 3 bedroom dwelling - 3 persons, 4 bedroom - 4 persons, etc., this shows that circa 32,000 additional persons will be required to occupy such dwellings. Bearing in mind people dying, births (including prior years), etc., many extensions being carried out on dwellings, per applications being put to the Council, and the perusal of estate agents offerings in all sectors, it seems highly improbable that we need to facilitate additional housing for 32,000.
- 2.4. For an unknown reason, the Council underplays its successful, even exemplar, 'Empty Homes back into Use' Programme, which has support and funding. Instead of backing its own 9-year long record of delivering a near-constant, always positive, 250 homes back into use each year (mainly for very needy families), it proposes to include just 90pa. This would mean that just 1,350 additional dwellings would be added to Wirral's Housing Stock rather than 3,000.

3. Exceptional Circumstances

There are clear 'exceptional circumstances' for Wirral to adopt an 'alternative approach' to establishing its 'Housing Need'. Such 'exceptional circumstances' include:

- 3.1. The situation on Wirral is without doubt 'exceptional', both in terms of scale of need and opportunity. It has some of the most deprived communities but also the greatest extent of 'brownfield', previously developed land in the Country, including vacant and convertible land and buildings (including those currently of non-residential classification), inactive and underactive Dockland, and undeveloped, attractive Waterfront - all with huge potential. The combination of such extensive deprivation, need and opportunity constitutes a situation of truly 'exceptional circumstance', which demands should allow special measures. This was fully recognised by the former Merseyside County Council (MCC) when it drew up the Peninsula's earlier Plans and its tight Green Belt boundaries. The determination was to drive forward regeneration by restricting alternative, easier options and to fully adhere to the 'Fifth Purpose of Green Belt' (NPPF). The classification of all land outside of existing urban areas as 'Green Belt' (to the exclusion of other land classifications) was entirely deliberate and intended to be 'permanent' at least until the objectives were achieved. MCC agreed with its other Local Authorities that all other types of housing could be accommodated within their boundaries or Wirral's existing built-up areas. This needs to remain the situation, steered by Liverpool City Region (LCR) and by the legal 'Duty to Cooperate' of Neighbouring LA's.
- 3.2. A basic list of 'exceptional local circumstances' includes:
 - 3.2.1. The huge difference between the 12,000 formula figure and Wirral's actual

Need, which is nearer 3,000, is an 'exceptional circumstance' in itself, sufficient enough to trigger the challenge and to base the Local Plan on a lower. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities, in their initial Reports) and by two local highly qualified experts who are members of the Group of 20+ Wirral community, environmental and other societies (WGSA).

- 3.2.2. Wirral's population has basically flat-lined for years and growth in population or the local economy does NOT support a higher figure. There is a NIL chance of 12,000 being correct nor is Wirral about to be invaded by 20 to 30 thousand people, especially as Senior Officers and Council Leaders have recently reconfirmed that there is no policy nor intention to build homes to cater for encouraged inward migration. It is nonsense to suggest 12,000 is a reasonable 'Need'.
- 3.2.3. Wirral's Green Belt was tightly drawn around existing areas of housing specifically to address the overriding demand and need which was regeneration of the declined and deprived areas around Birkenhead, Wallasey, New Ferry, etc. The policy of the former Merseyside County Council, agreed by all constituent Local Authorities, was to use this restriction and the Purposes of Green Belt, particularly Purpose 5, to force Regeneration as the main option. Almost nothing has changed. The overriding development need of Wirral is still the same, and so should the policy be. These are 'exceptional (local) circumstances', which don't apply elsewhere, and should be recognised and used by our Council and embodied in its Policies.
- 3.2.4. Cabinet Members and Officers do not believe in the 12,000 figure as evidenced in the notes of meetings and letters to the Government by former and current Council Leaders.
- 3.2.5. Wirral is a constrained Peninsula which has no land that isn't either built upon, 'brownfield' or Green Belt. There's no white land, etc. We cannot expand into the sea. This is unusual and exceptional.
- 3.2.6. Wirral has huge potential through its Heritage assets which are largely unexploited (for good ends) and also not yet properly assessed. Such assets are known to exist across much of the Green Belt which is under consideration for release. This fact should disqualify all those sites from consideration for release – this is a LEGAL requirement.
- 3.2.7. The last Queen's Speech provides another 'exceptional circumstance' which LAs must take into account when making its Plans or holding Plan Reviews, namely the reduction in the National Housebuilding Target by 33%. This alone should reduce the upper band of consideration to 8,000. The Government target was downscaled from 1.5 million to 1 million additional homes during the five years of the current Parliament.
- 3.2.8. Wirral has 'exceptional circumstances' when it comes to nature. It's estuaries, sea and open land conditions make it significant for wildlife, migration and conservation of national and international significance. Much of the inappropriately and wrongly termed 'weakly performing Green Belt' would be damaged and lost to these important considerations if released and developed.

3.2.9. Wirral's Local Economy has declined massively and regeneration will take decades (and only occur if the main thrust is 'Regeneration'). Meanwhile, its Local Economy depends hugely on its Green Belt to attract visitors and residents. Tourism, sport and farming depend upon it. Wirral's dependency on its Green Belt constitutes another 'exceptional circumstance'. It should be preserved at least for now and possibly only reconsidered at the next Plan Review.

4. Overall Conclusion

The Conclusion of this particular initial review of the latest Report by Liverpool University is that it does not consider sufficient factors to reach the 'sound' conclusion that there are no 'exceptional local circumstances' to adopt an alternative approach to calculating actual 'Housing Need'. Further, the Report is not even considered 'sound' or definitive within the narrow remit of just considering variables involved in the 'standard method' and comparisons with other LAs.

S Anderson

July 8, 2020

inward migration. It is nonsense to suggest 12,000 is a reasonable 'Need', and our Council knows it. Does it still want Green Belt development for the short-term financial gains?

Wirral's Green Belt was tightly drawn around existing areas of housing specifically to address the overriding demand and need which was Regeneration of the awful, declined and deprived areas around Birkenhead, Wallasey, New Ferry, etc. The policy of the former Merseyside County Council, agreed by all constituent Local Authorities, was to use this restriction and the Purposes of Green Belt, particularly Purpose 5, to force Regeneration as the main option. Almost nothing has changed. The overriding development need of Wirral is still the same, and so should the policy be. These are 'exceptional (local) circumstances', which don't apply elsewhere, and should be recognised and used by our Council and embodied in its Policies.

- 4.1.1 Cabinet Members and Officers do not believe in the 12,000 figure – see the notes of meetings and letters to the Government by former and current Council Leaders.
- 4.1.2 Wirral is a constrained Peninsula which has no land that isn't either built upon, 'brownfield' or Green Belt. There's no white land, etc. We cannot expand into the sea (although we could try hundreds of house-boats!!). This is unusual, exceptional even and quite deliberate. But not deliberate so as to force release of Green Belt: quite the opposite.
- 4.1.3 The Council has passed motions which reinforce the 'exceptional circumstances' NOT to release ANY Green Belt land. Being late in the day with its Plan, it should be based upon the 'exceptional circumstances' of the present times. These motions must apply to the Local Plan: Climate Emergency; No Release of Productive Farmland; massive Tree Planting; and more.
- 4.1.4 Wirral has huge potential through its Heritage assets which are largely unexploited (for good ends) and also not yet properly assessed. Such assets are known to exist across much of the Green Belt which is under consideration for release. This fact should disqualify all those sites from consideration for release – this is a LEGAL requirement.
- 4.1.5 The last Queen's Speech provides another 'exceptional circumstance' which LAs must take into account when making its Plans or holding Plan Reviews, namely the reduction in the National Housebuilding Target by 33%. This alone should reduce the upper band of consideration to 8,000. The Government target was downscaled from 1.5 million to 1 million additional homes during the five years of the current Parliament.
- 4.1.6 Wirral has 'exceptional circumstances' when it comes to nature. It's estuaries, sea and open land conditions make it significant for wildlife, migration and conservation of national and international significance. Much of the inappropriately and wrongly termed 'weakly performing Green Belt' would be damaged and lost to these important considerations if released and developed.
- 4.1.7 Wirral's Local Economy has declined massively and regeneration will take decades (and only occur if the main thrust is 'Regeneration'). Meanwhile, its Local Economy depends hugely on its Green Belt to attract visitors and residents. Tourism, sport and farming depend upon it. Wirral depends on its Green Belt to an 'exceptional', possibly unique extent, providing another 'exceptional circumstance'. It should be preserved at least for now and possibly only reconsidered at the next Plan Review.
- 5.0 The Conclusion of this particular initial review of the latest Report by Liverpool University is that it does not consider sufficient factors to reach the 'sound' conclusion that there are no 'exceptional local circumstances' to adopt an alternative approach to calculating actual 'Housing Need'. Further, the Report is not even considered 'sound' or definitive within the narrow remit of just considering variables involved in the 'standard method' and comparisons with other LAs.

ⁱ Emaples include: Para 2.36 "Figure 2" should read "Figure 3"; the Figure 12 graphic on Median house prices is in fact a repeat of the Figure 9 graphic on In-migration (numbers); the Figure 13 graphic on Percentage change in median house prices is another repeat of the Figure 9 graphic on In-migration (numbers); the Figure 18 graphic on ONS Population Projections for Wirral is in fact a repeat of the Figure 17 graphic on Mid-year estimates of Wirral's population.