

## Wirral Local Plan Viability Testing Assumptions Consultation

The basis for the densities proposed by Keppie Massey stem from the results of the Urban Imprint *Density and Design* study. The driving force behind the Urban Imprint study is the fact that the Council is sticking to the 12,000 housing requirement over the period of the Local Plan. This estimated housing need is a grossly overestimated, unrealistic figure, with the true figure being closer to 4000 dwellings over the 15 year Local Plan period. In consequence, the actual densities necessary to achieve the real need are much less.

The Urban Imprint study highlights the fact that Wirral Council has been traditionally conservative in housing densities. There is a good reason for this, Wirral has not needed and at the present time does not need to employ significantly higher densities to satisfy its real housing need. Whilst land utilisation should always be used wisely and densities increased where appropriate, much more importantly for Wirral is to improve the quality of its current housing stock.

Use of the housing densities proposed would result in housing numbers / types very far removed from those currently existing. While change is inevitable, changes should be gradually and spread over time to allow communities to come to terms and accept them. The change in densities proposed would be far too extreme and thus not be acceptable to communities. Also, although paragraph 122 of the NPPF does highlight the need for the efficient use of land, it also emphasises the need to retain the character of an area.

The study proposes to include very broad areas within the same density or value zone. This broad brush approach therefore ignores significant differences within these areas and therefore becomes of questionable value.

Even though parts 3 & 4 of the Urban Imprint study are not yet available and indeed may not even have been completed, decisions would appear to have already been made.