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SENT BY EMAIL
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30/03/2021

Dear Sir / Madam,

WIRRAL LOCAL PLAN: DRAFT EMPLOYMENT LAND AND PREMISES STUDY

1. Thank you for consulting with the Home Builders Federation (HBF) on the Wirral Draft Employment Land and Premises Study.
2. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.
3. The HBF notes that this Draft Wirral Employment Land and Premises Study (DWELPS) is an update to the previous study undertaken in 2017 and that it aims to guide the Local Plan by understanding the anticipated demand for employment land in the Borough, as well as identifying the potential employment sites that could address this requirement.
4. The HBF is concerned that the DWELP underestimates the anticipated demand for employment land in Wirral, and that in doing so that it risks undermining the future economic growth of the Wirral.
5. The HBF notes some of the key findings of the report¹ including the potential for low population growth to lead to a shortage of workforce in Wirral, which could lead to businesses progressively relocating to other areas, the numbers of people commuting out of the Borough to work, the misalignment between education of the population and the work available creating missed opportunities for the Borough, the low proportion of medium sized businesses considered to be due to the current property and site portfolio.
6. The HBF also notes the viability issues raised by the report which highlights that there is a very challenging viability position across all development types, and in particular office development.

¹ Section 4, page 64



7. The DWELP considers three potential scenarios; Economic Capacity Impact; Workforce Capacity Impact and Market Capacity Impact, with three potential land requirements resulting.
 - a. The **Economic Capacity Impact** this is based on testing the mix of employment activity in the future including looking at the impact of committed investments, this gives an employment land requirement of **49ha**.
 - b. The **Workforce Capacity Impact** looks at translating projected population growth into local workforce, this would give an employment land requirement of **15.2ha**.
 - c. The **Market Capacity Impact** considers historical trends and continuing them forward, this gives an employment land requirement of **131.2ha**.

The DWELP goes on to discount the Market Capacity Impact and the Workforce Capacity Impact, as it states that the economy in Wirral is already radically different to the historic market and that the Workforce Capacity Impact may underestimate the importance of changes to the economy.

8. In conclusion, the DWELPS identifies a need for just 49ha of employment until 2040. This is significantly below the 56.7ha to 129.6ha identified in the Liverpool City Region (LCR) Strategic Housing and Employment Land Market Assessment (SHELMA) over the period 2012 to 2037 and used in the previous Employment Land Study (2017), below the level identified in the previous UDP and significantly below the historic employment land take up as highlighted by scenario 3 (Market Capacity Impact). The HBF are concerned that if too little employment land is provided this will impact on economic development and investment within the Borough.
9. The HBF also note that Lichfields' has undertaken work for a consortium of housebuilders, including a number of HBF members, that has identified an employment land requirement significantly above that identified in the DWELP. The HBF recommends that further work is undertaken by the Council to ensure that the Local Plan will allocate sufficient employment land.
10. The HBF considers that it would also be appropriate for the Council to give further consideration to the impacts of Covid-19 on office demand or the distribution and logistics market, as this may have led to some fundamental changes in the types and densities of employment seen in the area going forward and to the impact of the new Use Classes Order, as this may have an impact on the potential uses of employment land going forward.
11. The DWELP identifies that the 'good' and 'very good' sites are all location in the three sub-areas of Wirral Waters, Birkenhead and Bromborough, and suggestions that this will need to be considered as part of the strategy for allocations. The HBF considers that it is important that the Council can provide an appropriate level of good quality employment land, in a range of areas that are attractive to the market, that can attract inward investment and create higher paid jobs. This should also be balanced with an appropriate level of housing provision, of an appropriate mix and range to provide a suitable workforce ready and able to take these job opportunities.

12. The HBF generally supports the Council in seeking to make most efficient use of land and in looking to re-use employment land for residential and alternative development. However, the Council will need to give consideration to which of the de-allocated employment sites that would be made available for redevelopment are appropriate for residential development. The Council will need to consider whether the sites would contribute to the provision of an appropriate range of sites in terms of location, market and size, whether they would be viable and whether they could provide a mix of homes that would meet the needs of the local people.

Future Engagement

13. I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.

14. The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,

A handwritten signature in cursive script, appearing to read 'Joanne Harding', written in black ink.

Joanne Harding
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