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Dear Sir / Madam,

WIRRAL LOCAL PLAN: WIRRAL DENSITY STUDY

1. Thank you for consulting with the Home Builders Federation (HBF) on the Wirral Density 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 Wirral Density Study (WDS) draws together the findings of the previous draft reports and provides recommendations for the draft density policy to be included within the Wirral Local Plan.
4. The WDS recommends the use of four density zones:
 - a. **Waterfront Zone** – an area within approximately a 5min walk from the waterfront either along the Mersey or around the Birkenhead Dock complex. The report suggests that densities of approximately **70-75 dwellings per hectare (dph)** can be delivered in this area.
 - b. **Urban Core & Town Centre Zones** – this area is focused on an area within 800m of Birkenhead town centre and within 400m of the other town centres. The report suggests that densities of around **60dph** can be accommodated in this area.
 - c. **Transit Zone** – these are areas either along high frequency bus routes or within 400m of a railway or metro station. The report suggests that these areas can accommodate a range of between **50-75dph**.
 - d. **Suburban Zone** – these areas may not be so well served by public transport but have access to local shopping facilities and access to community infrastructure. The report suggests that average densities in these areas are **40dph**.
5. Section 4 and Appendix 1 of the WDS set out the recommended draft policy. It sets out the minimum densities for each of the four density zones and states that schemes that do not achieve these minimum densities will be refused unless it can be demonstrated that the application of these standards is inappropriate having regard to identified



constraints. Outside of the density zones new residential development must achieve efficient use of land having regard to the character of the area.

6. The HBF generally supports the Council in setting a density policy, making efficient use of land and making as much use as possible of previously developed land (PDL) in accordance with 2019 NPPF. However, the HBF considers that it is important to ensure that the prioritisation of higher density development and the use of PDL does not compromise the delivery of homes in sustainable locations to meet local needs.
7. The HBF notes that the WDS states that in developing the density policy, it will need to be accepted that some changes to local character will occur, especially in the areas where a significant uplift may occur. It is also noted that the proposed densities for the transit zones and the waterfront propose an uplift in the average densities for the local context. The HBF considers that there will be a need to ensure that the local character is not lost due to the emphasis on establishing higher densities.
8. The WDS recommends that the policy is applied to the gross developable area of the site, rather than to the gross site area or the net site area. It also states that approaches to parking, open space and amenity may need to be considered in a different way on some of the developments. The HBF is concerned that these potential elements of a successful and sustainable development are potentially going to be overlooked in order to provide a denser development. The Council will need to give significant consideration to whether this need for greater density is sufficient to overlook the need to protect resident's amenity or provision of normal residential facilities.
9. The HBF notes that the report does not appear to have given consideration to some of the other potential policy requirements which may also impact on density and site layout including the use of the M4(2) and M4(3) standards, the nationally described space standards (NDSS) (although briefly mentioned the potential impact on density is not evidenced), provision of cycle and bin storage, the mix of homes provided, the availability of EV Charging alongside parking, any implications of design coding and the provision of tree-lined streets, highways requirements, and the potential requirements in relation to Biodiversity Net Gain, changes to the Building Regulations requirements in relation to heating and energy and the Future Homes Standard. The HBF is concerned that in order to achieve the densities proposed the Council may not be able to deliver on a number of these other policy requirements. The HBF consider that it would be beneficial to reconsider the reality of the density requirements alongside the impacts of all of the Council's policy requirements and emerging Government policy.
10. The WDS (Stage 4 Detailed Design Assessment) states that in order to accommodate parking within higher density schemes a variety of approaches have had to be used including on-street and in court, which it highlights as the most common form. These styles of parking have particular issues when considering the provision of EV Charging Points and will need to be given further consideration in terms of cost of provision and maintenance and how this may impact on viability.

11. The WDS also identifies that the viability of the proposed densities has not been considered. The HBF considers that this could be an important consideration and should not be overlooked. The HBF also considers it will be important to consider the future deliverability of intensely developed residential schemes, which will be dependent on the viability of PDL and demand for high density urban living post Covid-19.
12. The HBF is also concerned that the use of higher densities has implications for the type, size and tenure of the homes provided and may mean that the Council is not always able to provide an appropriate housing mix across the Council area. This may mean that the homes delivered do not meet the housing needs of the local community or the market demand in the area.
13. The WDS (Stage 4 Detailed Design Assessment) notes that higher density developments will favour apartments and terraced properties in order to achieve the densities. It is likely that due to recent circumstances that people's aspirations and needs may have changed. Zoopla's House Price Index (November 2020) highlights that price growth for houses (4.3%) is more than double that for flats & apartments (1.8%). It states that the search for space has been a key feature of the market due to Covid-19 restrictions, as households re-evaluate their housing requirements. It goes on to state that demand for family housing with gardens, parking and extra space to work from homes has continued to rise. This suggests that the market is already changing and may need further consideration, to ensure that the appropriate homes are provided in Wirral. The HBF recommends that the Council look again at their existing stock, the market aspirations and needs, and the potential mix of their future supply.
14. The HBF considers that in taking forward any density policies or other policies that are likely to impact on house building the Council should ensure that it has worked closely with the home building industry, to ensure that the policies are realistic, achievable and will ensure the delivery of homes that are appropriate to the market in the area.

Future Engagement

15. 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.
16. 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,



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