



The countryside charity Cheshire

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Working locally and
nationally for a beautiful
and living countryside

24 July 2020

Dear Forward Planning Team,

I am writing a joint submission on behalf of CPRE Cheshire (the Wirral Society is our local district group) and the Wirral Green Space Alliance (herein for ease the group is referred to as WGSA) with comments arising from the Wirral Council consultation on the Local Plan Evidence Base documents <https://www.wirral.gov.uk/planning-and-building/local-plans-and-planning-policy/wirrals-new-local-plan/new-local-plan-evidence> :

- Appendix 1 - ECC1.8 Agricultural Economy and Land Study Addendum
- Appendix 2 - ECC5.6 Wirral Landscape Sensitivity Assessment Addendum
- Appendix 3 - ECC15 Wirral Local Landscape Designations Review 2020
- Appendix 4 – H6 Exploring the Computation of Housing Need in Wirral 2020

WGSA acknowledge the recent good progress made by officers in refreshing the local plan evidence base, and we remain grateful for opportunities to meet with officers to discuss constructively our concerns for our environment.

This submission does not preclude representations from individuals and organisations within the WGSA group, in fact we encourage positive engagement to ensure local knowledge is added to sure up the robustness of the studies that underpin the emerging local plan policies and allocations.

Wirral Green Space Alliance

Wirral Green Space Alliance (WGSA) is a consortium of more than thirty local societies, including: Barnston Village Conservation Society, Bebington Residents, Bidston Village Conservation Area, Bromborough Society, Campaign to Protect Rural England, both Cheshire and Lancashire, Liverpool City Region & Greater Manchester, Claremont Group Conservation Areas Wirral, Defend Wirral's Green Open Spaces, Eastham Village Preservation Association, Frankby Conservation Area Advisory Committee, Friends of Birkenhead Park, Greasby Community Association, Hamilton Square Conservation Area, Heswall Society, Irby Cricket Club, Irby Thurstaston and Pensby Amenity Society (ITPAS), Kings Gap Conservation Area, Meols Drive Conservation Area, Mountwood Residents, Oxton Society, Saughall Massie Conservation Area, Stop Hoylake Golf Resort Action Group, Storeton Residents Association, The Caldby Society, The Ramblers Wirral Group, The Wirral Society (CPRE Wirral), Thornton Hough Community Trust Ltd, Thornton Hough Conservation Area Society, Wirral and Chester Wildlife, Wirral Footpaths and Open Spaces Preservation Society.

WGSA members share an ambition for Wirral's greenspace to be best protected and enhanced by the emerging Local Plan when planning for new development requirements.

We are CPRE, the countryside charity

We want a thriving, beautiful countryside for everyone, now and in the future. We're working for a countryside that's rich in nature, accessible and that plays a crucial role in responding to the climate emergency. With a local CPRE group in every county, we're advocating nationwide for the kind of countryside we all aspire to: one with sustainable, healthy communities and available to more people than ever, including those who haven't benefited before. We stand for a countryside that enriches all of our lives, nourishing our wellbeing, and that we in turn nourish, protect and celebrate.

Wirral has beautiful countryside, which we hope will be protected by the local plan for everyone in the future.

Our key Issues of Interest

CPRE is an umbrella charity championing rural places as new development is planned. We have a particular interest in the following:

- **Natural Landscapes** – we seek to protect our scenic rural landscape character, tranquillity, dark skies, and hedgerows;
- **Better Places to Live** – we encourage the planning of enough affordable homes in rural places, reusing brownfield sites in existing urban places in advance of developing beloved greenspace;

- **Farming** - we support farming that puts back habitats for wildlife, provides fresh air and clean water, stores carbon and looks after the landscapes that make our countryside so special;
- **Sustainable Transport** - We want everyone to have genuine, sustainable travel choices, keeping cars off the road and pollution out of the atmosphere; and,
- **Climate emergency and energy** - we're calling on government to speed up the move to renewable energy and to set a target date for phasing fossil fuels out altogether.

I am on the local plan database and will engage in the progression of the local plan as constructively as possible, but please do keep in contact with CPRE on any of the above mentioned issues.

Climate Emergency

For legal compliance the Local Plan must be compliant with the Statutory Instrument 1056, which commits the UK to a legally binding target of net zero greenhouse gas GHG emissions by 2050, replacing the much less demanding target of at least 80% reduction of emissions from 1990 levels. WGSA believes that the Local Plan must be revised as a matter of law to achieve our international commitments.

If you require any further information please do be in touch.

Yours sincerely

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Planning Manager

Patron
H.M. The Queen
President
Lord Grey of Codnor
Chairman
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Secretary
Debbie Janney
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Appendix 1 - ECC1.8 - Agricultural Economy and Land Study Addendum

1. WGSA acknowledges that the study seeks to provide an up-to-date assessment of agriculture in Wirral including underlying soil and geology and climate limitations. The study tries to capture the views of a number of agricultural stakeholders including farmers, agricultural landlords and statutory consultees and identifies areas where best and most versatile agricultural land is likely to be present including the Green Belt parcels that were identified for further investigation in the 2018 Development Options Review.
2. WGSA wishes for a more strategic approach to the assessment of agricultural land and is concerned that some of the stakeholders involved may be seeking consents for development in the future due to aspirations of potential higher land values. This might lead to soil quality being classified as lower than it is in reality.
3. The Government in National Planning Policy Section 15 Conserving and enhancing the natural environment in Paragraph 170 states

“170. Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;”

4. CPRE has long campaigned for our high grade farmland to be protected for future generations. In our view Best and Most Versatile (BMV) Grade 1 land, due to its rarity, and national significance, should not be allowed for development. There should be no flexibility for Grade 1 to be developed. Development should generally be discouraged on BMV Grade 2 and 3a land, and as an exception only be consented for development if justified by ‘very special circumstances’. Development should also be discouraged on Grade 3b. The Local Plan should recognise the importance of high grade farmland for the rural economy and job creation and retention. The recent events of Covid-19 and unknown trade deals as we leave the EU mean our food supply chains could be vulnerable and we need to consider our future food security.
5. Wirral Green Space Alliance in its response to the Regulation 18 consultation, set out that exceptional circumstances to release Green Belt land do not exist. CPRE echoed this opinion. Furthermore, WGSA does not agree with the classification of sites set out within the 2019 Green Belt Green Belt Review, and consequently those sites identified in Appendix 5 of the Agricultural Economy and Land Study Addendum. In our view, they do not form a sound basis for the study. We do agree with a study conclusion, and outcome of recommending

that technical agricultural land classification surveys be undertaken on 'any potential development land', but the search for sites ought not to be based on the false premise that Green Belt land should be released.

6. The Study in our view falls short of the evidence necessary to base decisions upon for local plan allocations. Overall due to the approach to identification of sites there is a Wirral wide lack of objective assessment. There is no systematic application of criteria. The conclusion about keeping of horse is misleading, as it suggests the farmland is not used, or could be used for productive agricultural purposes now or in the future. Therefore how useful the analysis will be to local plan purposes is doubtful.

CPRE Campaigning progress: Government follows CPRE's lead in recognising the value of soil

7. The government's new agriculture bill, which is currently working its way through parliament, includes lots of radical proposals to the way England farms. But there's one especially pleasing change – and it's something that we've campaigned on for some time.
8. We're delighted to see that the bill recognises the need for our soils to be regenerated. It's easy to overlook soil, or to dismiss it as simply the earth beneath our feet – but we at CPRE have long recognised soil as one of the fundamental building blocks of our entire agricultural system.
9. We rely on rain falling on a thin layer of soil which can be just a few centimetres thick to grow the crops which become our food. But this essential soil is fragile and faces significant pressures. The climate emergency further contributes to the risk of harm to soil, and so our December 2018 soils report, Back to the land, made recommendations about what more could be done to keep soils healthy.

Helping farmers to help soil

10. The new bill, in recognition of the threat to this precious commodity – and in a pleasing sign of progress from the bill published in 2018 –states that the government will provide support for farmers to improve the management of their soil, as we recommended.
11. Crispin Truman, our chief executive, said:

'This agriculture bill has been a long time coming but it's clear the government has listened to our message about how essential our soils are. We need healthy soil for the supply of food and clean water, and to help us lock up carbon to tackle the climate emergency.'

‘As new payment schemes for farmers are developed, there must be clear support for approaches already being pioneered and made to work by farmers such as agroforestry and conservation agriculture. But farmers need training, mentoring and advice to help them roll out nature-friendly farming across the countryside.’

Appendix 2 - ECC5.6 Wirral Landscape Sensitivity Assessment Addendum

1. This study attempts a full review of the landscapes across Wirral, including the Areas of Special Landscape Value. It is supposed to identify the landscapes of the highest quality and most value in the Borough that could potentially merit local designation in line with current best practice and provides up to date evidence and justification for the recommended Local Landscape Designation areas and their boundaries.
2. As previously stated, WGSA previously, echoed the criticisms of the Wirral Green Space Alliance in its response to the Regulation 18 consultation, set out that exceptional circumstances to release Green Belt land do not exist. Furthermore, it did not agree with the classification of sites set out within the 2019 Green Belt Green Belt Review, and consequently those sites identified in Wirral Landscape Sensitivity Assessment Addendum.
3. Presumably the review of the landscapes of the selected areas is intended to support the Wirral local plan develop appropriate recommendations for policy implementation. However WGSA is concerned about the robustness of the assessment as all of the areas are assessed to be lower than they are in reality. To highlight the issue, worryingly the front cover photograph shows a green field edged by housing, taken from a footpath with a piece of litter in the foreground. The emphasis of the litter appears intentional to obviously detract from the perception of quality of the landscape. Consequently WGSA is concerned that the assessment has sought to downplay the quality of the landscapes to promote future development. The landscape sensitivity grading for all of the areas is consistently lower than in reality. In the comments given below we give examples, and evidence of need for areas to be appropriately regraded to reflect their higher levels of landscape sensitivity.
4. As an alternative, the Addendum could have included any number of landscapes across Wirral. For example, see the image below of Irby Village, with the landmark feature tree by the community pub providing views towards farmland to the Welsh Hills beyond.

Image 1.0 Irby Village Hub



Area reference: 5.13

5. LUC concludes that Area reference: 5.13 has a moderate landscape sensitivity. WGSA is of the view when the landscape features are taken altogether the area is more sensitive and should be graded of moderate/high sensitivity, based on the comments below.
6. The area does have notable historic landscape character and in part this has been alluded to, however local residents believe the heritage assets to be more sensitive. As stated in the Conservation Area Appraisal, "The open land around the Conservation Area is a key feature in the character of a traditional rural village, which maintains Frankby's individuality. These fields in agricultural production separate Frankby from its near neighbours...it is crucial that this feature is preserved."
7. WGSA agrees that opportunities to increase access and enjoyment of the landscape in association should be taken, but we disagree that this should be associated with any new development.
8. WGSA believes that the consultants have looked at a small section of the area at the central part, which is dedicated to equestrian uses. It appears to lack commentary on the areas to the north and south of the site, which both are of a higher landscape character and are in my view more sensitive to development.

Extract of Figure 1.3

Figure 1.3: Representative photos



Pasture fields divided by horse tape. Greasby lies beyond the wooded course of the Greasby Brook.



Pasture fields on the edge of the Frankby Conservation Area with views to Greasby.

Photo 1.0 Taken from Frankby Road (B5139)



Photo 2.0 Taken from Hillbank Road



9. See extract of Figure 1.3 representative photos, and see how the landscape quality contrasts starkly with the landscape character of the northern and southern parts of the site shown in Photo 1.0 and Photo 2.0. WGSA recommends that the area should be re-graded as moderate/high sensitivity, based on the reality of the landscape of the entire area.

Area reference: 7.5

10. Area reference 7.5 is concluded by LUC to have a moderate/high landscape sensitivity. WGSA believes this should in fact be a high grading. This is because of the location adjacent to the Dee Estuary. The Wirral Way is a public right of way on the eastern boundary of the area of high recreational value and providing numerous visual receptors. There are hedgerows to the southern boundary and these may be considered important under The Hedgerow Regulations 1997 (20m and has existed for 30 years or more).
11. The Heswall Society has made a number of useful comments in its response to the consultation with regards to Area 7.5.

Area reference: 7.19

12. Area reference 7.19 is concluded by LUC to have a low/moderate landscape sensitivity. WGSA disagrees strongly with this appraisal as the existence of Viking assets at Cross Hill emphasises its high value of the historic landscape character. The open area also forms an important Green Belt purpose of maintaining the two separate places of Thingwall to the north and Barnston to the south. We recommend regrading to moderate/high sensitivity.
13. We agree with the observations made by Prof David Gregg concerning the landscape and heritage of the area, particularly with regards to wider Wirral and Dawpool to parts of the Battle of Brunanburh, where the rout of combined forces of the Irish Vikings, Welsh and Scottish armies created a unified England - it could be that important to the development of Wirral's Tourist Industry. It is important this heritage is valued by the local plan and that it informs where future development should be located, and where it should not.

Area reference: 7.25

14. Area 7.25 is considered by LUC to be of moderate landscape sensitivity. However due to the historic associations and the natural forms including mature hedgerows, and deciduous woodland, there is a high level

of residential amenity provided. Therefore WGSA believes the landscape sensitivity is in fact higher and should be regraded properly to moderate/high.

15. There are some notable omissions from the Addendum with regards to this area, such as at Sandy Lane there are orchards and other agricultural businesses and land uses. Other representations from local groups help to plug the deficiencies.

Area reference: 7.26 Moderate

16. Area 7.26 is graded by LUC as of moderate landscape sensitivity. WGSA strongly objects to this as it is a high quality landscape, which is not accurately reflected in the report.

17. Area ref 7.26 has valued biodiversity, with natural habitats and features including ponds and several mixed woodlands. In the future the local plan must properly value the setting of Irby Hall, which is Grade II listed, complete with a moated site and also is designated as a Scheduled Monument for its archaeological importance. The historic field pattern around the Hall also contributes to its setting.

18. The value of Green Belt purpose cannot be overstated here as the north of the area plays a role in the separation of the historic village of Thurstaston from Irby.

19. The photos in Figure 5.3 show muddy fields rather than the splendid rural scene of the Sandstone Hills Preserve open long-distance views to the west across the Dee Estuary towards the hills in North Wales, when stood on the boundary of the area. In our view the landscape assessment is flawed as it provides a very misleading portrait. To illustrate the point, please compare the images at Figure 5.3 with Photo 3.0.

Extract of Figure 5.3

Figure 5.3: Representative photos



Arable land north of Penrhyd Road with fragmented hedgerows and long views across the Dee Estuary to North Wales.



Pasture field on the ridge overlooking Thurstaston church tower, the Dee Estuary and North Wales.

Photo 3.0 taken from Backford Road facing west.



20. WGSA recommends the area 7.26 is regraded to accurately reflect its high value sensitivity. This site would be inappropriate for allocation for residential development due to its current high landscape character value.

CPRE Campaigning

21. CPRE believes that landscape is more than just ‘the view’. It’s the ever-changing relationship between people, place and nature. The landscapes we know and love – from mountains, uplands, moors and the seascapes of our stunning coastline to rolling countryside and green parkland in urban and rural areas – all have their own distinctive character and sense of place. We want as many people as possible to access these landscapes and enjoy their benefits to our wellbeing, and so we work nationally and locally for a positive future for all landscapes.

Appendix 3 - ECC15 Wirral Local Landscape Designations Review 2020

1. This study seeks to provide an assessment of the character and quality of the landscape of the Green Belt parcels that were identified for further investigation in the 2018 Development Options Review and their susceptibility to change as a result of the introduction of new built development. We are concerned about the approach to site selection.
2. WGSA agrees all landscapes are of value, and is pleased to see reference to the National Planning Policy Framework paragraph 170, which states that:

“Planning policies and decisions should contribute to and enhance the natural and local environment by: ...protecting and enhancing valued landscapes...(in a manner commensurate with their statutory status or identified quality in the development plan);”
3. It also refers to NPPF 171 which says:

“Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.”
4. Natural England National Character Area (NCA) profile are a very useful source of information and the Wirral Peninsula falls into the NCA profiles number 58 Merseyside Conurbation and 59 Wirral. WGSA recommends that the information in these documents is relied upon as they follow natural lines in the landscape rather than administrative boundaries, making them a good decision making framework for the natural environment. The information they contain should support the planning of conservation initiatives at a landscape scale, inform the delivery of Nature Improvement Areas and encourage broader partnership working through Local Nature Partnerships.
5. Nature Connect is the representative Local Nature Partnership and WGSA recommends this body is consulted with to share best practice to inform choices about how land is managed and should change as part of the local plan process. The current key drivers for ongoing change need to be understood. A broad analysis of each area’s characteristics and ecosystem services should be noted, with Statements of Environmental Opportunity (SEOs) referred to that draw on this integrated information. Critical issues are identified, which could help to achieve sustainable growth and a more secure environmental future.
6. Some of the appraisal methods applied by LUC are open to criticism as they lack criteria assessment to score sites in terms of scale, comparison or weighting. Therefore the evidence lacks a systematic procedure to

properly assess sites. Arguably, the approach to the identification of sites and current approach gives the impression that there was a predetermined outcome.

Central Wirral Sandstone Hills

7. WGSA has considered the recommendations outlined for the Central Wirral Sandstone Hills area. We make the following comments:
- We agree with the retention of the existing Areas of Special Landscape Value (ASLV) as Local Landscape Designations (LLD).
 - We agree with the retention of the existing boundaries which are robust and defensible, excluding areas now within urban settlements. The purpose of Green Belt must be upheld.
 - We agree the aim of the Local Landscape Designations Review should be to encourage integrated management within this area of heathland and woodland along the sandstone ridge. We agree that there is an opportunity to enhance the boundaries along the urban edges to maintain the distinction between rural landscape and urban areas. Enhance the interface with the A540 Telegraph Road where the condition of the more open farmland could be improved. Improve connections between Thurstaston Common and Heswall Dales and Thurstaston Common and Caldby Hill. WGSA supports the aim of promoting, protecting and enhancing the long open views across the surrounding countryside and across the Dee Estuary, which are particularly characteristic from this elevated area. Any development that would cause a built intrusion and would harm the views should be prohibited. The value of the rural scene across Wirral is high and the local plan ought to protect it for the benefit of future generations.

Dee Estuary

8. WGSA has considered the recommendations outlined for the Dee Estuary and makes the following comments:
- We agree with the retention of the existing ASLV as an LLD and division of the area to more closely reflect the LCT/LCA boundaries. This would mean the coastal areas to the west of Thurstaston will be included within the Dee Estuary LLD, and the higher farmland to the east will be part of the candidate Central Wirral Sandstone Hills LLD.
 - We support the inclusion of the area between Heswall Fields and Cottage Lane within the LLD so that the whole of the undeveloped coastal strip along the Dee is protected, along with the rest of the Dee Estuary Area of Special County Value (ASCV) within Cheshire West and Chester Borough. Elements of landscape character that add to local distinctiveness should be protected, such as saltmarsh and mudflat habitat typical of the transitional coastal fringe landscape that has a strong relationship with the Estuary. The expansive

views over the Estuary to the Flintshire hills should also be protected, along with aspects of tranquillity including quiet and dark sky spaces. Heritage assets must be properly understood and valued. The recreation value afforded by the Wirral Way long distance footpath and other rights of way should be championed in the local plan evidence base and be reflected in emerging local plan policies that steer sustainable development.

- WGSA agrees that the coastal and wider landscape context of land, sea and views to Wales should be protected for future generations to enjoy the benefits of that experience. Local plan policy objectives to enhance the area would be very welcome, specifically the enhancement of natural elements, including hedgerows and trees.
- WGSA also supports the inclusion of the natural coastline at the mouth of the Dee Estuary fronting the Royal Liverpool Golf Club, as the area meets the criteria to protect local distinctiveness and landscape quality. The scenic and natural qualities of the Hilbre Islands and the North Wales coast, including nationally and internationally designated habitats of the Red Rock SSSI/Dee Estuary Ramsar). The recreational value of the shoreline paths for birdwatching is high
- WGSA would applaud an approach which is based on the integrated management of the area of estuarine landscape/seascape. We think it is correct that there is an opportunity to improve the coastal landscape and estuarine habitats. Ensuring defensible urban edges is important to this aim. We would also support the improvement of conditions for the more fragmented farmland and for recreational facilities.

Thornton Hough Estates

9. WGSA has considered the recommendations for Thornton Hough Estates and makes the following comments:
- We agree with the retention of the existing ASLV as an LLD, with modifications to the boundaries as noted.
 - We support the proposed extension of the LLD to the north to include the formal avenue of trees into Storeton as we agree local distinctiveness would be better supported in the future.
 - We agree with the proposed extension of the LLD to the south to include the village of Raby and surrounding farmland, as we agree local distinctiveness would be better supported in the future, including detailing such as Cheshire rail estate fencing, red sandstone walling, hedgerows and trees that are features of Raby. The historic fabric, including the Grade II listed historic agricultural buildings and estate cottages ought to be protected. The amenity of the only right of way should be maintained and where possible enhanced in the future.

- WGSA endorses the promotion of additional recreational routes within the area and seek opportunities to open up the linear causeways for public access and recreation.

Summary

10. We agree the local landscape designations are important to steer development to the right places in the future. However the identification of sites is problematic and the approach to scoring gives the public the impression that there was a predetermined outcome and therefore the objectivity is questioned. Site selection for local plan allocations must be based on sound sustainable development criteria and protect intrinsic landscape qualities, including visual impacts and other important planning issues to ensure our ecological, heritage and other asset value is best protected for future generations.

Appendix 4 – H6 Exploring the Computation of Housing Need in Wirral 2020

1. WGSA has considered the study which states there are no exceptional local circumstances that justify deviating from the standard method for assessing local housing need in national planning guidance including the most recently released 2018-based sub-national population projections. In our view, the report is limited in value as it merely accepts previous studies along with flaws we have previously raised, including with the Liverpool SHELMA, which has yet to be found sound or independently examined. We have previously found the flaws due to the assumptions of very high economic growth, based on fanciful scenarios, which are highly improbable, particularly given Brexit, and Covid-19 impacts.
2. The West Lancashire local plan was withdrawn due to flaws identified in its housing evidence base, linked to the SHELMA. In addition, Liverpool Local Plan is due to go to Examination in October 2020 and the robustness of the SHELMA as an appropriate evidence base will be questioned.
3. WGSA has considered the expert opinion of Piers Elias an independent demographer (please find his analysis attached at the end of this letter). We think his approach is correct, and the evidence justifies his recommendation for an Objectively Assessed Housing Need of 380 dwellings per annum for the period 2019 to 2035, based on ONS 2018 SNHPs and a 10 year (within UK) migration trend should inform the housing requirement, and land supply policies of the local plan. We trust that the Council will amend the housing policies accordingly and thereby take away the unnecessary development pressures from Wirral's green spaces.

Analysis of Housing Need calculations for the Wirral for Wirral Green Space Alliance

Introduction: This is a summary note examining the latest projections for population and households for the Wirral and considers what the Objectively Assessed Housing Need should be. The Objectively Assessed Housing Need (OAHN) is the 'policy-off' number of **ADDITIONAL** dwellings by which the existing Housing Stock is to be increased during the Local Plan Period (15 years) and is separate from all replacements and up-grading of sub-standard dwellings (net zero effect on Stock) and some other categories.

Evidence Base: H1 Draft Strategic Housing Market Assessment:

Standard Method : 783 dwellings per annum

(Source: Page 14, Paragraph 2: <http://www.wirral.gov.uk/planning-and-building/local-plans-and-planning-policy/local-planning-evidence-and-research-report-41>)

"Housing Need" from the Household survey: 794 dwellings per annum

(Source: Page 124, Paragraph 8.2: <http://www.wirral.gov.uk/planning-and-building/local-plans-and-planning-policy/local-planning-evidence-and-research-report-41>)

How does this compare with the current situation?

Latest Projections: MHCLG and ONS Sub National Household Projections (SNHPs), based on ONS Sub National Population Projections (SNPPs)

Table 1 - MHCLG & ONS Latest sets of Sub National Household Projections

Local Authority	Base	Source	Projection Type	Mid 2014	Mid 2015	Mid 2016	Mid 2017	Mid 2018	Mid 2019	...	Mid 2035	Hhlds Change 2019-35	HHlds Per Annum 2019-35	Dwellings Per Annum 2019-35
Wirral	2014 Based	MHCLG SNHPs	Principal	142,530	143,150	143,900	144,650	145,400	146,130	...	156,530	10,400	650	670
Wirral	2016 Based	ONS SNHPs	Principal	141,350	141,740	142,190	142,590	143,010	143,390	...	150,080	6,690	420	430
Wirral	2016 Based	ONS SNHPs	10 Year	141,350	141,740	142,190	142,520	142,870	143,190	...	148,510	5,320	330	340
Wirral	2018 based	ONS SNHPs	Principal	141,350	141,740	142,190	142,800	143,280	143,970	...	153,480	9,510	590	610
Wirral	2018 based	ONS SNHPs	5 Year	141,350	141,740	142,190	142,800	143,280	143,850	...	151,330	7,480	470	480
Wirral	2018 based	ONS SNHPs	10 Year	141,350	141,740	142,190	142,800	143,280	143,770	...	149,600	5,830	360	380

Source: MHCLG and ONS, crown copyright. Shaded figures are projections

Note: Base figures rounded to nearest 10. Vacancy Rate assumed at 2019 MHCLG Level 3.2%.

Table 1 shows the annual dwellings per annum based between 2019 and 2035 from the most recent three sets of population and household projections. Changes in methodology and improvements in data sources should steer planners towards the most recent information to ensure the most recent trends are reflected in the projections. However the length of the trends for migration within the UK has been changed by ONS for the "principal" set of the 2018 Based SNPPs from five years to two years, and this means too much weight is given to the two years 2016-17 and 2017-18. ONS do now produce variant projections using 10 year and 5 year trends, and these, in particular the former, should be considered above the "principal" set as they will give a more stable long term projection with a better degree of smoothing to allow for economic cycles, which is even more relevant with the Covid19 impact on the economy and movement of people.

Preferred Approach: For the 2016 Based sets and beyond, ONS took over the SNHPs and introduced variants to the population and household projections. This included a 10 year migration trend in the SNPPs which is a preferred scenario as it helps smooth out blips in economic cycles and ensures a more measured approach. All sets and variants of projections are controlled to a national target ensuring consistency across all Local Authorities.

As a demographer, I would advocate using the following:

- the latest projection data i.e. 2018 Based population and household projections.
- Use a 10 year trend for migration within the UK (to smooth economic cycles).
- Inclusion of 2019 MYE if the estimate is very different from the projected figure for 2019, as this would indicate a change in the trends of the components that needs to be considered.

Using the first two bullet points, the starting point for an **OAHN would be 380 dwellings per annum**, which ties in with recent net completion rates of 411 (See Table 5).

Third Bullet Point: In the Wirral's case, the 2018 Based SNPP for 2019 was very close to the recently published MYE for 2019 and so the inclusion of 2019 data would only make minor differences in the projections.

Table 2 - Mid Year Estimates - Components of Change

Component	mid-2011	mid-2012	mid-2013	mid-2014	mid-2015	mid-2016	mid-2017	mid-2018	mid-2019
Population	319,840	320,390	320,670	321,500	321,700	322,220	322,800	323,240	324,010
Births	3,890	3,590	3,610	3,500	3,570	3,420	3,300	3,210	
Deaths	3,470	3,620	3,500	3,680	3,730	3,660	3,750	3,640	
<i>Natural Change</i>	420	-30	110	-180	-160	-240	-460	-430	
Internal In	7,720	7,550	8,090	7,650	7,760	8,790	8,830	9,110	
Internal Out	7,680	7,210	7,500	7,500	7,300	8,080	8,170	8,170	
<i>Internal Net</i>	50	340	590	150	450	710	650	940	
International In	590	610	690	720	700	750	940	720	
International Out	550	680	610	510	510	650	720	460	
<i>International Net</i>	50	-60	80	210	190	110	220	260	
Special Adjustments	30	20	50	20	30	10	20	10	

Source: ONS MYE Components of change, crown copyright

Note: May not sum exactly due to rounding

Migration: Internal Net (i.e. within the UK) Migration over the last 7 years has been variable, though consistently positive, and increasing more recently (see Table 2). ONS used to use the average of the last five years as the trend for the SNPPs but have used a two year average in the 2018 Based "principal" set of SNPPs. The reason for this change was ONS only had data for the years 2016/17 and 2017/18 for their new methodology for allocating students after study. However, longer term trends for migration are available under a 10 year migration variant, something Local Authorities had lobbied for and these provide a more stable trend.

A longer term migration trend is recommended to help smooth shocks, such as the housing market collapse (2008/09) and Covid19 (2020 on) and is more in line with longer term projection sets of 15 to 20 years ahead.

Standard Method

The affordability uplift for Wirral is +13.1%. Using the 2014 SNHPs for household growth between 2019 and 2035 gives a dwelling target of 780 per annum (Table 3). Using the 10 years 2019 to 2029, the equivalent figure is 790. More recent projection sets give lower projected numbers of dwellings per year.

Table 3: Standard Method, using 2019 to 2035 as the timeline and 2019 Affordability Data, ONS

Local Authority	Base	Source	Projection Type	Mid 2019	...	Mid 2035	Hhlds Change 2019-35	Affordability % Change (2019 Based)	Dwellings 2019-35	Dwellings per Annum
Wirral	2014 Based	MHCLG SNHPs	Principal	146,130	...	156,530	10,400	1.131	11,762	780
Wirral	2016 Based	ONS SNHPs	Principal	143,390	...	150,080	6,690	1.131	7,566	500
Wirral	2018 based	ONS SNHPs	Principal	143,970	...	153,480	9,510	1.131	10,756	720

Source: Ratio of median house price (existing dwellings) to median gross annual (where available) workplace-based earnings by local authority district, England and Wales, 1997 to 2019. ONS, Crown copyright.

The 2016 Based SNPPs used a five year average for migration within the UK (average +300). The decision by ONS to use a two year trend (average +700). Had ONS used a five year trend, the average would have been +500 and the standard method would then have calculated dwellings per annum at around 600 per annum. Using a five year average would at least provide some smoothing, albeit over a period of constant growth (2011/12 to 2015/16).

In February, 2019 MHCLG said the formula would be reviewed after 18 months and that is yet to happen. (¹ Para 3, *Government Response to the Technical Consultation Question 1*).

Arguments against the use of the Standard Method

- UK Statistics Authority (UKSA) advocates the use of the "latest" information ².
- The accuracy of estimates and projections improve at higher levels of geography (ONS Accuracy of Subnational Projections Executive Summary ³); any changes at sub national level need to be controlled to a Regional or National Target; the standard method has no such control.
- When moving away from the base trend, the expectation would be that some Planning Authorities build above-trend rates, and some below-trend in order for migration to balance out; the standard method proposes that 98% of Local Authorities build above-trend rate.
- National projections provide the target for sub-national projections. At the UK level migration within the UK sums to zero each year. For 98% of Local Authorities to grow, they must use each other's migrants to fill jobs and houses while in reality, moves cancel each other out - an extra migrant in Authority A is one fewer in Authority B (and across the UK, sums to zero).
- Each Local Authority runs its projections for housing need independently and does not consider the impact on neighbouring Authorities in terms of exchange of migrants. The projection software Popgroup, as used by many Local Authorities, works in the same way i.e. any target can be set and achieved, theoretically.
- There would be capacity (skills, manpower) issues if all Planning Authorities build at above-trend rates at the same time.

¹

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779792/LHN_Gov_response.pdf

² <https://www.statisticsauthority.gov.uk/wp-content/uploads/2016/06/National-Statisticians-Guidance-Management-Information-and-Official-Statistics.pdf> Section 4.3

³ <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/methodologies/subnationalpopulationprojectionsaccuracyreport>

Age profile of Wirral and its Migrants. In terms of median Age, Wirral is ranked 135 youngest (44.4 years) out of 385 UK Local Authorities (35th percentile) - Oxford is youngest with median age 28.9 and North Norfolk is the oldest with median age 54.3. In terms of age structure of migration within the UK, Table 4 shows the detailed moves within the UK for the years to 2011/12 and 2018/19.

Table 4 - Detailed Moves within the UK to and from Wirral, 2012 and 2019

Age_Group	Year to Mid 2012			Year to Mid 2019			Change 2012 to 2019			Direction of Change
	Moves IN	Moves OUT	Net Moves	Moves IN	Moves OUT	Net Moves	Moves IN	Moves OUT	Net Moves	
00-04	694	424	270	513	377	136	-181	-47	-134	Fewer IN Fewer OUT
05-09	349	279	70	300	269	31	-49	-10	-39	Fewer IN Fewer OUT
10-14	242	203	39	259	198	61	17	-5	22	More IN Fewer OUT
15-19	330	1,373	-1,043	266	1,191	-925	-64	-182	118	Fewer IN Fewer OUT
20-24	1,708	1,480	229	2,115	1,421	694	407	-59	465	More IN Fewer OUT
25-29	976	933	43	1,263	1,182	81	287	249	38	MORE IN MORE OUT
30-34	794	707	87	907	809	98	113	102	11	MORE IN MORE OUT
35-39	571	471	100	737	544	193	166	73	93	MORE IN MORE OUT
40-44	458	373	85	556	374	182	98	1	97	MORE IN MORE OUT
45-49	375	308	67	425	379	46	50	71	-21	MORE IN MORE OUT
50-54	320	319	1	403	363	40	83	44	39	MORE IN MORE OUT
55-59	234	201	33	324	295	29	90	94	-4	MORE IN MORE OUT
60-64	194	166	28	285	214	71	91	48	43	MORE IN MORE OUT
65-69	135	135	0	224	156	68	89	21	68	MORE IN MORE OUT
70-74	81	74	7	197	116	81	116	42	74	MORE IN MORE OUT
75-79	76	53	23	111	80	31	35	27	8	MORE IN MORE OUT
80-84	85	75	10	96	82	14	11	7	4	MORE IN MORE OUT
85+	97	103	-6	126	119	7	29	16	13	MORE IN MORE OUT
All Ages	7,722	7,676	46	9,107	8,169	938	1,385	493	892	MORE IN MORE OUT

Source: ONS Detailed Migration for moves within the UK, crown copyright

Flows for the younger age groups (under 19) have slowed with fewer people moving both IN and OUT of the Wirral, while for all the age groups over the age of 25, flows have increase in both directions suggesting a more buoyant labour and housing market. The impact of Covid19 will have a massive downward impact on migration (both internal and international) for 2019/20 and for some time to come, in terms of slower movement between Local Authorities, and will re-enforce the need for using long-term trends to smooth out shocks such as this. This will have a dampening effect particularly on the working age population which will affect both jobs and demographic projections.

Completions: Data from MHCLG show that the average completions between 2011-12 and 2018-19 were 411 per annum, with considerable variation for individual years.

Table 5 - Net Additional Dwellings

Table 122 Net additional dwellings¹ by local authority district, England 2011-12 to 2018-19

Net additions to dwelling stock

2011-12 ^P	2012-13 ^P	2013-14 ^P	2014-15 ^P	2015-16 ^P	2016-17 ^P	2017-18 ^P	2018-19 ^P	Average 2011/12-2018/19
22	252	302	537	498	328	704	643	411

Source: MHCLG Live Tables 122

Net completions have been higher in most recent years with an average of 411 per annum since 2011; this is in line with the recommended OAHN of 380 and demonstrates a realistic level of net building.

Vacancy Rates: In 2019, Wirral has 4,722 vacant dwellings, representing 3.2% of its housing stock. Of these, a large number (1,920), and a high proportion (41%) are long term vacant dwellings (Source MHCLG Table 615⁴) - if these long term vacant dwellings were brought back into use, through compulsory purchase or other local policy, that would reduce the requirement for new dwellings by **120 per annum** over the plan period.

⁴ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/875344/LT_615.xls

Recommendation: Having examined the latest demographic data and methodology, my recommendation for Wirral would be an Objectively Assessed Housing Need of 380 dwellings per annum for the period 2019 to 2035, based on ONS 2018 SNHPs and a 10 year (within UK) migration trend. This represents a nationally consistent and objective starting point for housing need.

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