

## **Matter 2: Vision, objectives and the spatial strategy**

***Issue 2: Has the spatial strategy and overall distribution of development been positively prepared, is it justified by a robust and credible evidence base, and is it consistent with national policy?***

*1. Has the spatial strategy been fully informed by the SA and other evidence? Does it accord with the NPPF?*

*2. Have reasonable alternatives been considered and clearly discounted on the evidence?*

*3. Would the policies in the Local Plan, taken as whole, effectively implement the vision and strategic objectives? If not, what modifications are necessary?*

*4. Are the 11 Regeneration Areas, 8 within the Birkenhead Framework Area and at Liscard, New Brighton and New Ferry, justified in terms of a spatial focus for growth? How were the 11 selected? Does the evidence indicate that there should be any additional ones?*

*5. Is the process that led to the spatial approach and to the selection of regeneration areas and sites robust and clear? Have the 'highest performing sites' been taken forward in that regard?*

***6. Is the strategy overly reliant on larger urban sites? Would this be to the detriment of other settlements?***

1. The HBF does not wish to comment upon the acceptability or otherwise of individual sites. It is, however, important that all the sites contained within the plan are deliverable over the plan period and planned to an appropriate strategy. The HBF would expect the spatial distribution of sites to follow a logical hierarchy, provide an appropriate development pattern and support sustainable development within **all** market areas. The strategy should also ensure that it will meet the housing needed for all different groups in the community including those who require affordable housing, family homes, homes for older people and people who wish to commission or build their own homes.
2. The HBF is keen that the Council produces a plan which can deliver against its housing requirement. To do this it is important that a strategy is put in place which provides a sufficient range of sites to provide enough sales outlets to enable delivery to be maintained at the required levels throughout the plan period. The widest possible range of sites by both size and market location are required so that small, medium and large housebuilding companies have access to suitable land to offer the widest possible range of products. A mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector.

***7. Is the overall level, pattern and distribution of development set out in the spatial strategy viable and deliverable in general terms?***

3. The HBF is concerned that limited evidence has been provided by the Council in relation to the deliverability of the spatial strategy provided in the Local Plan. The HBF is also concerned about the potential impacts of the spatial strategy in terms of meeting the

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housing needs of all elements of the local community, including homes for families, older people and those requiring affordable homes.