



The countryside charity  
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Forward Planning Team  
Wirral Borough Council  
Forward Planning Team  
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Working locally and  
nationally for a beautiful  
and living countryside

6 April 2020

Dear Forward Planning Team,

I am writing in response to the Local Plan Issues & Options (Regulation 18) Consultation on behalf of CPRE Cheshire.

CPRE fights for a better future for England's countryside. We believe a beautiful, thriving countryside is important for everyone, no matter where they live. Millions of town and city dwellers recharge their batteries with a walk or a bike ride in the local Green Belt, spend weekends and holidays in our National Parks, or enjoy fresh local produce. People who live in rural areas keep our countryside beautiful and productive. We want to ensure future generations also benefit from rural places.

CPRE Cheshire echo's the answers of the Wirral Green Space Alliance to the set questions. We think it is right that environmental and planning designations that protect valued local assets should endure in the future for the benefit of all. Key issues are:

1. Correcting the scale of development quantum for both housing and jobs to reflect realism is important. Housing is specified at 3-4 times what it should be (using the standard method and ONS 2014 derived data). This bloated requirement needlessly threatens the environment, when translating into the all-important 5 year housing land supply, land which is deemed special, and underpins Wirral distinct landscape character.
2. Crucially the Local Plan should address the problem of vacant and underused former industrial brownfield sites in our existing urban areas. This will support both the Government's national planning policies and Wirral Metropolitan Borough Council's (the Council) declared ambitions to effectively use the land resources by encouraging as much suitable brownfield land as possible to be regenerated.
3. We applaud Pat Hackett (the Leader) and Paul Satoor (Chief Executive of the Council's) for their recent commitment to revitalising Birkenhead, and promoting a place on the Left Bank

of the Mersey that is digitally connected and smart, sustainable and designed to inspire with the establishment of a New Development Corporation. Wirral should be a place of innovation and entrepreneurship, where the community thrives and visitors are offered a distinctive cultural experience along with protecting and enhancing our beloved greenspace.

4. We understand that high level negotiations are currently taking place with the Ministry for Housing, Communities and Local Government (MHCLG) and the Council to strike a deal that ensures strategic housing delivery and targeted investment and regeneration. This is a good use of public money, as most people agree that we ought not bulldoze our greenfield land in advance of available previously developed sites. We believe that more sites can be identified for inclusion on the brownfield register.
5. Other areas for improvement include the Council having proper regard for air quality and we show why to date we think it has failed to do this in the Local Plan. Likewise, we think there is more work to be done to ensure the Local Plan properly plans for development in the context of the area's heritage assets, especially development that although not directly within, is located next to conservation areas.
6. We are concerned that the Council should have proper regard to the sequential test for planning retail policy and retail allocations. The same is true for applying the sequential test for flood risk. The recent flooding events across several counties are a timely reminder of the harm to communities and threat posed by unsustainable development in the flood plain. Flood alleviation and mitigation are important topics for the policies and allocations of the Local Plan.
7. The National Planning Policy Framework (NPPF) recently beefed up the requirements for authorities to progress statements of common ground to improve their responsibilities under the duty to co-operate. Although Wirral shares a single land boundary with Cheshire West and Cheshire, its physical linkage to Liverpool and the wider Liverpool City Region must not be forgotten. The requirements of Government to demonstrate effective working with neighbours must be discharged properly, and we do note deficiencies, that should be addressed. This is a binary issue when it comes to the examination, a pass or a fail. Sevenoaks, Wealden and St Albans have all experienced delays due to failure to evidence Duty to Cooperate.
8. Recently, Harrogate's Local Plan was found sound after its housing target was cut by the Examiner, leading to some 24 proposed site allocations being dropped from the adopted Local Plan. There are other examples of this, and we hope the Council will progress a Local Plan that closely reflects local requirements, which it can reasonably meet when performance checked in the future against the Housing Delivery Test.

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H.M. The Queen

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9. We do wish to hold the Council to account on the Local Plan having proper regard for environmental impacts, including the cumulative impacts of development. In our view, there are environmental issues that have not been adequately addressed. The Local Plan should ensure environmental harm is avoided, and properly mitigated and compensated to the appropriate level, reflecting the Government Guidance for in excess of +10% Biodiversity Net Gain targets for new development. The Local Plan needs effectively policy enshrined within the Local Plan and appropriate allocations.
10. The health and well-being of Wirral's people is at stake when the Local Plan is prepared. We must plan in a more sustainable way in the future and make sure our air, land, and water are free of pollutants, and that we have enough green infrastructure, including trees and hedgerows to filter contaminants and make the area a healthy place to live, work and visit. Housing should be located close to employment to minimise commuting and pollution, and to encourage cycling and walking.
11. CPRE Cheshire, like WGSA makes constructive criticism, in the hope the information will enable the Council to progress a more acceptable Local Plan to the Regulation 19 stage. Although the consultation period was extended, and again so due to Coronavirus, CPRE Cheshire remain concerned that responding to the 90 or so questions of the Issues and Options document, and considering the 54 supporting evidence base documents, was daunting and not all issues may have been picked up, so reserves the right to raise issues moving forward. The online system with 300 word limit (plus attachments) may for many people have been off-putting. This might limit the level of response to the consultation.
12. In summary, CPRE Cheshire recognises that our rural areas and greenspace are incredibly vulnerable without up to date policies in place. Therefore, we genuinely hope that the planning team does progress the draft Local Plan for submission to the Secretary of State for examination accordingly. In our endeavour, we are keen for an improved Local Plan to be adopted without delay, containing the right mix of policies and allocations to look after our greenspaces, whilst delivering enough jobs and houses, including affordable ones.

Yours sincerely

Jackie Copley, MRTPI, MA, BA (Hons), PgCert  
Planning Manager

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