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Forward Planning
Wirral Council Environmental Services
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27th November 2017

Dear Mr Fraser,

Comments on Initial Green Belt Review

I wish to respond for The Heswall Society to the Consultation on the Draft Initial Green Belt Review.

The document refers to Stage 2 - Initial Assessment of Physical or Policy Constraints and we would put forward the Coastal Zone as being a Policy Constraint.

1 The current UDP Policy CO2 sets down the current criteria for "small scale" development in the Undeveloped Coastal Zone. The Reasoned Justification for the policies includes the statement:

20.21 The fact that much of the landward undeveloped coast is Green Belt, and that the intertidal areas are covered by statutory nature conservation designations, provides strong safeguards against inappropriate development in the Undeveloped Coastal Zone. Policy CO2, therefore, provides further guidance on the two uses which may be appropriate within the undeveloped coast. Policy CO2 should, in particular, be read in conjunction with the policies for Green Belt and nature conservation which can be found in Section 7 and Section 13 of the UDP.

The above is against the background of the reasoned justification to UDP Policy GBT1 - Green Belt Boundaries which was to check the unrestricted sprawl of large built up areas; to prevent neighbouring towns merging into one another; to assist in safeguarding the countryside from encroachment; and to assist urban regeneration.

The above are fundamentally the aims of the Green Belt in the NPPF.

2 The Proposed Submission Draft Core Strategy Draft Settlement Area Policy for Heswall states:

5. Maintain and enhance access to the coast and to the major natural and semi-natural open spaces at Heswall Dales, Thurstaston Common, Arrowe Country Park and the Wirral Way, while maintaining and enhancing the national and international importance of the foreshore and their value for landscape, biodiversity and earth science;

3 An earlier version had included the underlying reasons for this policy, which remain relevant:

3.8 The local shortage of urban amenity greenspace is offset by access to the Dee coastline and surrounding natural and semi natural open space, much of which is of high value for nature conservation. There is, however, a shortage of allotments, provision for children and young people and outdoor sports facilities and a number of football teams travel to sites outside the Area for home fixtures(10). The landscape at Heswall Dales requires conservation and enhancement(11).

Although the Strategy refers to the importance of the Dee Coastline to Area 7 the section of coastline lying between Area 7 and the coast is actually Green Belt lying in Area 8.

4 The Proposed Submission Draft Core Strategy Policy CS11 para 6 reads:

6. Maintain and enhance the natural and semi-natural character of the undeveloped coastline; the national and international importance of the inter-tidal foreshores and their supporting habitats; and the biodiversity value of local nature reserves, dune systems, lowland heath, woodlands, hedgerows, river corridors, ponds, wetland and farmland habitats, including any linkages with the surrounding urban areas;

7 It is clear that there is continuing need to rely on Green Belt policies to achieve the above policies. The offsetting of the shortage of urban amenity greenspace and protection of the Undeveloped Coastal Zone (as currently defined) needs to be addressed as additional constraints in any review of Green Belt. The achievement of sustainable development also follows from these points.

In our view the above additional policies need to be included in the review as “Additional Constraints”.

Yours sincerely,

Dennis Clegg
Planning Officer, The Heswall Society