

**The Heswall Society Comments on:  
ECC15 Wirral Local Landscape Designations  
– Review and Recommendations**

In general terms it is important to note that all landscape is of value. This principle was established by the European Landscape Convention (ELC), which came into force in the UK in March 2007. The ELC recognises that landscape is an important part of the quality of life for people everywhere: in urban areas and in the countryside, in degraded areas as well as in areas of high quality, in areas recognised as being of outstanding beauty as well as everyday areas. The ELC establishes the need to recognise landscape in law and to establish procedures for the participation of the general public and other stakeholders in the creation and implementation of landscape policies. The Heswall Society would like to see the ELC and that "all landscape is of value referenced in the Local Plan and that non-designated areas can also be 'valued' .

It is disappointing that this study is consulting the public after it has been published and not during the drafting process.

Wirral Metropolitan Borough Council (WMBC) commissioned LUC to carry out a full review of the landscape across the Borough to provide evidence to underpin robust up-to-date Local Landscape Designation (LLD) areas, to inform landscape policies in the Wirral Local Plan. In summary, the objectives of the study were to:

- a Review the Wirral landscape to identify the landscapes of highest quality and most value in the Borough that could potentially merit local designations in line with current best practice.
- b Provide up-to-date evidence and justification for recommended LLD areas and their boundaries.

The Society was pleased to observe that this was all apparently achieved in full compliance with NPPF criteria.

The Heswall Society (HS) has only considered this document in terms of that part of the landscape which lies either within or very close to the area of the Heswall Ward. For this particular part of Wirral, it shows a depth of understanding of the area and this is appreciated.

HS supports both the proposed creation and boundaries of Central Wirral Sandstone Hills and the Dee Estuary Local Landscape Designation (LLDs). However, although these are two separate character areas, the contrasts are also important and linkages need to be maintained and improved between these two (LLDs) areas (excluding Bidston) as well as within them and this should be included within the aims of both LLDs. These areas were classified in the recent (November 28, 2019) ARUP Green Belt Review (areas 7.1-7.5) as weakly performing. The current study indicates the importance of these areas to the landscape and emphasizes, yet again, one of the many weaknesses in the study. These areas should not be thought of as weakly performing Green Belt. The Heswall Society supports 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 and provides continuity with the Dee Estuary Area of Special County Value (ASCV) within Cheshire West and Chester Borough.

The Society also endorses that the aim within the new named Dee Estuary LLD should be to encourage integrated management within this area of estuarine landscape/seascape. There is indeed an opportunity to improve the coastal landscape and estuarine habitats, enhance boundaries along the urban edges to retain a well-defined distinction between the open coastline of the LLD and these settlements and improve conditions of the more fragmented farmland. Recreational facilities and connections along the coastline also could be improved.

The National Planning Policy Framework (NPPF 2019) for England commits to conserving the benefits of the best and most versatile (BMV) agricultural land, which is defined as grades 1, 2 and 3a of the Agricultural Land Classification (ALC). The addendum addresses five additional land parcels that were assessed by the ARUP report as making a weak overall contribution to the Green Belt. Included within the five land parcels was an area referred to as 7.5, which included SP104 (also identified as SHLAA 1968 depending upon which report one referred to). SP104 is the first parcel of land south of Riverbank Road. SHLAA 1939 or SP103 is the parcel of land north of Riverbank Road.

Both SP 103 and SP104 were classified as ALC grade 2 in the original reports. Across the Wirral no parcel of land was classified as Grade 1, therefore the 2 parcels of land are some of the highest grade classification within the Wirral Borough. The addendum confirms this classification within 7.5 and classifies the remaining parcels adjacent to Cottage lane as 3a. Thus all 7.5. comes within the definition of BMV.

The soil type associated with the ALC Grade 2 on either side of Riverbank Road is Salwick. Furthermore, the map of soil types shows that the soil type from 7.1 to part 7.5 are Salwick, not surprising, as most of the land is owned by the same farming family, unless subsequently sold. Therefore, it is highly likely that the vast majority of land within the coastal farming land is ALC Grade 2. See Appendix 6 within original report. The above factors alone should remove all the parcels of land from further consideration for future development.

However, the reason why such parcels of land have been considered as weakly performing against the NPPF is as a result of a serious flawed assumption in the Green Belt Review by ARUP. Within the Review ARUP conclude that none of the parcels of land from 7.1 to 7.5 are adjacent to the Urban area, and thereby contribute, in a significant way, to weakly performing sites. Furthermore, in their Landscape reports LUC refer to these parcels of land as being adjacent to the Urban built-up area, which is an obvious and incontrovertible assessment. In summary, such high graded farmland should be fully protected.

The Local Plan should provide for better / improved / stronger control of use for equine activities.