

# The Heswall Society

*"established for the public benefit to conserve the heritage of the Ward of Heswall"*

www.theheswallsociety.org.uk

Registered Charity No. 516421

Mr Andrew Fraser,  
Forward Planning Manager,  
Wirral Council Economic and Housing Growth,  
PO Box 290, Brighton Street,  
Wallasey, CH27 9FQ  
[localplan@wirral.gov.uk](mailto:localplan@wirral.gov.uk)

8th May 2019

Dear Mr Fraser,

## **CONSULTATION ON THE SCOPE OF THE WIRRAL LOCAL PLAN SUSTAINABILITY APPRAISAL AND EQUALITIES IMPACT ASSESSMENT**

The Heswall Society comments on the Sustainability Appraisal Consultation are as follows (numbering follows that in the Consultation Document):

### **2 Air Quality**

The HS notes (2.5 and 2.6) that as at January 2018 "NO<sub>2</sub> monitoring is carried out at 31 passive diffusion monitoring sites across the Borough. Particulate matter is monitored via two Automatic Urban Rural Network (AURN) sites. and WBC has identified a number of traffic hot spots where there is considered to be a particular likelihood of elevated emissions. These hot spots are at Singleton Avenue and Arrowe Park, both in Birkenhead, and at the A41/Port Sunlight roundabout. No hotspots are associated with the Borough's motorway junctions, nor toll point of the Kingsway Tunnel, suggesting that the presence of significant strategic road network (SRN) infrastructure does not currently give rise to notable air quality concerns." The Air Monitoring Report states "Through the course of the Local Air Quality Management programme, monitoring has been tailored to include those areas identified as traffic 'hot spots'. This focus is determined using local intelligence, historical data and information obtained from the Authority's sustainable transport team. The main 'hotspots' have been identified as Singleton Avenue (monitoring locations W3, W6, W20 and W21), Arrowe Park (monitoring locations W15 and W16), A41/Port Sunlight roundabout (monitoring locations W5, W7, W12, W13) and Wallasey Road (W18)."

The January 2018 monitoring stations do not include the later roadside monitoring station (W32) in Telegraph Road Heswall in 2018.

The A540 (Telegraph Road) passes through the actual shopping / commercial / social centre of Heswall - identified as a "key town centre". The UDP under Proposal TR5 identified Heswall Town Centre as "a site which exhibits traffic problems in relation to congestion at peak periods and vehicular / pedestrian conflict. The situation will be monitored, and detailed schemes may be drawn up in the future to alleviate such unsatisfactory conditions."

Since the UDP was adopted in 2000 the traffic situation in Heswall has significantly deteriorated and congestion is no longer only experienced at peak periods. Traffic travelling in a south easterly direction commonly starts queuing north of the Heswall Medical Centre (sometimes as far north as Quarry Road), factors are the junction with Tesco, the junction with Pensby Road, the bus station entrance / exit, the Rocky Lane junction and the Marks and Spencer store. In the opposite direction queues of traffic frequently south of Marks and Spencer and continue to Tesco.

Over many years the Heswall Society has expressed its concerns about Telegraph Road. In response to the consultation on the "Proposed Submission Draft Core Strategy December 2012" In Policy CS10 Clause 8 the Society noted the emphasis on "maximising the efficiency on routes through Heswall Town Centre to Birkenhead and the M53" and asked that the policy be expanded to include "and improve the pedestrian experience in the Town Centre" We would include health and safety within the all-encompassing term "pedestrian experience". When written, that statement had the pedestrian "shopper" in mind, and, in retrospect, we recognise that the need to address traffic harm also applies to cyclists.

The impact of development in and near Heswall Ward needs to be considered in the context of the impact on Heswall Centre.

## **8 Heritage**

Appendix 3 "Site Assessment Criteria" identifies "Relevant Criteria". Against Heritage there are 6 criteria, the last in the list being "Locally Listed Buildings". We suggest that the Local Plan should include provisions, based on NPPF, relating to heritage assets which are not nationally listed and should consider Local Listing.

## **9 Housing**

In 9.6 to 9.9. the document refers to the average rate of dwelling completions over the 5 years before the 2017/8 Monitoring Report and to the distribution of housing completions within Wirral between 2003/4 and 2014/15. It speculates that "Whilst this is positive in principle, it could suggest that housing from Greenfield sites is being severely constrained by protective designations, particularly Green Belt".

This high proportion of completed dwellings on brownfield land does represent the successful achievement of Council policy. I would refer to the Council's "Interim Housing Policy", introduced in 2005 and reviewed and retained unaltered in 2009 Link: <https://democracy.wirral.gov.uk/ieDecisionDetails.aspx?AllId=3877>

The Council initially adopted an Interim Planning Policy for New Housing Development in December 2003 in response to the spatial priorities set out in Regional Planning Guidance for the North West (RPG13, March 2003). The Interim Planning Policy was further revised in October 2005 to more strongly focus new housing development into identified regeneration priority areas, including the Newheartlands Housing Market Renewal Pathfinder Area.

The Interim Planning Policy was reviewed in March 2009, in response to the publication of the North West of England Plan and the findings of two planning appeals; and again in July 2010, following the initial proposals to revoke the Regional Spatial Strategy. It was

determined that the Interim Planning Policy would remain unaltered until replaced by the emerging Core Strategy Development Plan Document.

The Council's Interim Planning Policy for New Housing Development was revoked by the Council in October 2012.

The purpose of the policy was to focus new housing development within a number of identified regeneration priority areas including the Newheartlands Housing Market Renewal Pathfinder. The policy included a restraint on new housing development in West Wirral (with certain exemptions) which placed a virtual embargo on new dwellings in West Wirral. Appendix 10 of the SHLAA Update 2011 lists sites restricted by the Interim Housing Policy at that time. It will be seen that there are many non-Green Belt greenfield sites.

The following Wirral Council table of 2016 shows the geographical pattern of gross

Table 5.3 Geographical Pattern of Gross Housing Completions in Wirral 2003/04 – 2014/15

Year	Wallasey	Birkenhead Commercial	Birkenhead	Bromborough	Mid-Wirral	West Kirby & Hoylake	Heswall	Rural	Total
2003-04	45	42	269	62	108	55	81	24	686
2004-05	29	10	149	5	138	65	75	60	531
2005-06	150	21	184	23	32	18	74	9	511
2006-07	77	76	404	93	60	16	10	0	736
2007-08	153	49	329	185	84	7	10	3	820
2008-09	62	92	295	73	20	43	7	7	599
2009-10	66	34	92	65	78	0	2	3	340
2010-11	100	0	89	56	19	1	3	4	272
2011-12	13	0	108	130	4	0	3	10	268
2012-13	130	8	219	135	89	37	9	13	640
2013-14	87	4	198	83	64	42	10	12	500
2014-15	131	26	122	35	196	13	13	27	563
<b>Total</b>	<b>1,043</b>	<b>362</b>	<b>2,458</b>	<b>945</b>	<b>892</b>	<b>297</b>	<b>297</b>	<b>172</b>	<b>6,466</b>
Unattributable Completions	230	39	490	113	71	32	33	39	1,047
<b>Grand Total</b>	<b>1,273</b>	<b>401</b>	<b>2,948</b>	<b>1,058</b>	<b>963</b>	<b>329</b>	<b>330</b>	<b>211</b>	<b>7,513</b>

Source: Wirral Council 2016

housing completions from 2003/4 to 2014/15.

The sharp fall in number of completions in West Wirral reflects, not Green Belt constraints, but the Council's Interim Housing Policy with its specific focus on regenerating the many run-down areas of the Borough. There was an inevitable time lapse between the ending of the Interim Housing Policy in October 2012, the granting of planning permissions in West Wirral and actual completions. A further factor noted in the 2012/13 Monitoring Report was "Market conditions have, therefore, had a significant impact on the ability of developers to deliver new housing to the pre-recession levels envisaged in RSS."

There still remain considerable problems of run-down areas including Wirral Waters and the neighbouring areas, especially between the docks and the town centre. A sustainable approach to meeting the need for homes must focus first on making use of despoiled areas, which are generally close to employment areas, and the overcoming of the factors which hinder their regeneration.

Turning to the analysis of dwelling completions - we have raised a number of concerns about the accuracy of the Council's completion data in our response to the Council's previous consultation on the 2018 Development Options Review.

## 11 Landscape

The proposed SA Framework reads: "Protect and enhance the character, quality and diversity of the Borough's landscapes and townscapes through appropriate design and layout of new development, including the preservation of important open gaps between settlements, mindful of the need to make careful choices about Green Belt release." We are concerned that this statement does not reflect the need to protect those parts of the Green Belt which comprise coastal belts.

## 13 Transport

In para 3.15 we note the statement "The A540 corridor could have potential to provide a focus for more limited growth in the west of the Borough. There is limited strategic east-west connectivity within the Borough."

Under the heading of Air Quality we have already drawn attention to our concerns about the harmful impact of further traffic growth through Heswall Centre. However, our concerns are not limited to air quality but to the quality, vitality and sustainability of Heswall as a key town centre. This includes user experience and ease of crossing the busy highway between businesses. Further development which adds to the problems of Telegraph Road should be avoided.

Traffic growth on the A540 is also resulting in congestion at the Gayton Rounabout (junction with A551 and A5137) outside peak times.

With reference to the rail network para 3.15 states: "The Borough's rail network is good and train travel represents a much higher proportion of travel to work than elsewhere in the North West. Despite this it remains a low proportion of people's travel choices overall, suggesting there could be opportunities to unlock further growth in sustainable travel to work."

We question whether this is the case from Heswall because the Bidston to Wrexham Line is not integrated into the Merseyrail electric network, facilities at Heswall Hills Station are limited, as are public transport connections to the station.

Yours sincerely,

Dennis Clegg  
Planning Officer, The Heswall Society.