**Leverhulme Estates - Screening and Scoping Requests – January 2022**

**The Heswall Society Response**

The Heswall Society wishes to comment on the following series of screening requests put forward by Leverhulme Estates:

1. Land East of Dale View Close, North of Gills lane Pensby – up to 100 houses SCR/21/02385
2. Land East of Thorncroft Drive, North of Gills Lane, Pensby. – up to 15 houses –

SCR/21/02381

1. Land west of Barnston Road, North Of Gills Lane – up to 160 houses

SCR/21/02379

1. Land at Milner Road and Barnston Rd, Heswall – up to 100 houses SCR/21/02377
2. Land East of Glenwood Drive, Irby – up to 310 houses

SCR/21/02384

1. Land East of Raby hall, North of Raby Hall Rd, Raby Mere – 85 houses - SCR/21/02383
2. Land West of Raby Hall, North of Raby Hall Rd – 40 houses

 - SCR/21/02386

Although the Society is particularly concerned about the applications pertaining to Gills Lane and Milner Road/Barnston Road, our comments are primarily general and relevant to all of the sites in question.

The first point the Society would like to make is that these applications have been put forward at a time that makes it very difficult to respond comprehensively within the timescales given due to the Christmas break and Covid. Thus I hope that we would still have the opportunity to provide further comments after the January 13 deadline should we wish.

Another general point to make is that the Leverhulme vision and the scoping documents refer to a pressing need for new homes in the area and a Wirral Housing problem and hence release of Green Belt is necessary. This is based on the old assumption that Wirral needs to build 800 dwellings per year over the 15 Local Plan period. This figure has now been shown in a number of more recent analyses to be totally discredited. The real housing need being much, much less and can be satisfied without the need for Greenbelt release. The Society fully supports the Council Local Plan position of focussing on regeneration and developing brownfield sites only.

In terms of the scoping documents and methodology proposed, The Society would like to point out a number of areas where we feel there have been serious omissions. The Society has however left it to the experts in the area to provide much more detail around the points being made:

* The Environmental Impact Assessment must include the cumulative effect of all these sites together with any other neighbouring sites being developed on the environment of Wirral. Cumulative harms in combination may be significant, particular to loss of certain types of habitat and ecology.
* A proper analysis of lighting effects on wildlife, especially invertebrates and bats, should be included.
* Climate change effects need to be considered and not scoped out as we have a Council agreed Environment and Climate Emergency on Wirral. A carbon calculator for each site would be very helpful in this respect.

In our view brownfield sites in existing urban areas should be promoted for development in advance of greenfield sites due to the lower carbon per capita impacts.

* A broader ecology study is required that for example includes water voles and breeding birds (eg on Barnston Road site) which needs to be carried out in the spring.
* Net Biological Gain studies are required for the sites in question. The study makes no reference to one of the five key purposes of Greenbelt each of which would be broken should these developments go ahead. The study would need to unequivocally demonstrate that the net benefit far outweighed the damage to Greenbelt that would result.
* A proper analysis of drainage implications is required and also the effect on water tables.
* The waste analysis should include capacity to cope with foul water from the proposed developments. For example heswall has historically suffered from ability to handle such waste and indeed still does in certain areas during heavy rain.
* The scope of the methodology needs to include an investigation into the effect of the buildings on neighbouring Sites of Biological Importance. In addition, the Milner Road / Barnston Road site is within the Thurstaston Common Site of Special Scientific Interest (SSSI) Impact Zone, located to the west of the site and therefore it is important for an assessment of the likely impacts on ecology of the proposed application.
* An historical assessment of the sites need to be included and not scoped out. For example: the ancient roman road from Meols to Chester goes through the Barnston Road and Gills Lane site; tithe map field names are suggestive of past Norse and Irish conflicts; they may include escape routes from the battle of **Brunanburh.**
* An assessment has to be made for underground cables. For example the Western Link HVDC cable passes underground through some of the sites and this requires a 14m waylay.
* Any proposed mitigation and compensation must be adequate and enforceable.

In summary, the Heswall Society believes that the Leverhulme Estates position of developing these Greenbelt sites as a contribution towards Wirral’s housing problem is a fallacy. Wirral can satisfy is housing requirement through a brownfield first policy and focus on regeneration.

In terms of the proposed studies, the Society believes there are serious omissions that need to be addressed through comprehensive and no doubt time consuming studies to contribute meaningfully to the Environmental Impact Assessment and Environmental Statement for each site. The Society believes that more information is required by the applicant to better inform the decision takers of whether the principal of residential development is sustainable.

 Dr S Anderson 08/01/2022