

The Heswall Society - REVISED Note on Wirral Local Plan / Green Belt Review

KEY POINTS:

The Cabinet Report July 2018 arrived at a figure of 12000 over 15 years (803 per year) for the minimum number dwellings required for Wirral using the Government Standard Method and 2014 ONS 2014 based projections. **The Heswall Society's view is that the Council's estimate of the shortfall in housing need is wrong because:**

- The latest (2016) ONS based projections just published and, using the Government Standard Method, recalculates the minimum number of dwellings required to the significantly reduced figure of 7320 over 15 years (488 per year).
The July Cabinet report estimates a supply of 8735 new dwellings (7635 new dwellings and a provision of 1100 for Wirral Waters) over the Plan period. Using the demand figure of 7320 from above, this would make a surplus of 1415. There is therefore no shortfall even when only 1100 dwellings at Wirral Waters are taken into account over the Plan period. We cannot relax in our efforts however; there is still pressure on our Green Belt and the Council may decide not to work on the basis of the new projections.

Even with using the Council July figures we believe there is no need to go into the Green Belt because:

- **Wirral Waters** - In the Society's view the Council has not taken sufficient account of the potential from Wirral Waters. 1100 homes should be allocated to the first of the three Plan Periods (to 2025). The Council should make provision in the period between 2025 and 2035 for a further 5350 homes at Wirral Waters. This would significantly exceed the Council's July Cabinet shortfall of 4990 and contribute to a surplus when using the new ONS projections.
- **Buffer** - In its briefings the Council stated that it has added 20% of the 12,000 (ie 2400 dwellings) to meet a "National Planning Policy Framework" (NPPF2) requirement arising from previous under-delivery. The Council has misinterpreted the NPPF2. This requires a buffer to be "moved forward from later in the Plan period". It does not increase the total number of dwellings to be provided, merely their timing.
- **Windfall Sites** - The Council has provided for 60 sites per year which are not foreseeable in advance but which arise as the years go on. Based on our experience we think this is low. Furthermore the reuse of empty properties where active programmes are in place need to be better accounted for. The Council should review both its historic achievements in bringing properties back into use, review windfall application rates and recalculate its previous housing delivery numbers.

Infill Villages

We note that Appendix 16 of the Council's Review explores the issue of Infill Villages in the Green Belt and has identified a number of locations between the Wirral Way and the Estuary where "potential infill opportunities currently appear to exist." We support the Council retaining these sites within the Green Belt but are of the view that the sites by the estuary are key in preserving the setting of the Wirral Way.

The Heswall Society is still working on its response to the Council's Consultation and some points in this note may change. However, we encourage all residents to carefully consider the Local Plan Development / Green Belt Review. Local knowledge about the Green Belt areas identified either to be explored further for development or as potential Infill Sites needs to be communicated to the Council. It is especially important therefore that local people with such information submit their comments.

Comments can be either online at wirral.gov.uk/localplan or in writing to The Forward Planning Manager, Wirral Council Economic and Housing Growth, PO Box 290, Brighton Street, Wallasey, CH27 9FQ. Deadline by 5pm on 26th Oct.

More detailed information is provided in the following Appendix.

Appendix

About 220 people attended the Heswall Society Green Belt Meeting on 19th September. Shortly afterwards the Office for National Statistics (ONS) published its updated household projections. The **Council's calculation of housing shortfall, based on the previous ONS projections and The Heswall Society Note (dated 19th September) about the council's calculations are therefore both obsolete. We have now produced this new note.**

1 Did you know:

43% of Wirral is built on compared with our neighbours Cheshire West at 10% and the UK as a whole 6% (Source Alasdair Rae, University of Sheffield, A Land Cover Atlas of the UK.)

The Green Belt covers 45% of the Borough's land area. (Source Wirral Council)

Established in 1983, M53 corridor added in 2000. (Source Wirral Council)

It was tightly drawn to support urban regeneration. (Source Wirral Council).

Wirral's population was 340,500 in 1981 (APS), nearly 20,000 higher than in 2014, and 18,300 higher than the estimate for 2016. The population was much higher in the past but with a smaller housing stock than when Green Belt boundaries were fixed in a previous UDP/Local Plan of 1983.

The Secretary of State (then Sajid Javid) wrote to Wirral Council on 23rd March 2018 about the delay in producing a Local Plan; he wrote "In terms of our intervention criteria your Council has failed to make progress on plan making, the policies for the area are not up to date. **This is not an area of high housing pressure**" (Source - letter, our highlights)

2 Housing Need

The Heswall Society's view is that the Council's estimate of the shortfall in housing need is wrong because:

The ONS 2016 based projections have now been published and, using the Government Standard Method, the minimum need **has been recalculated using a 2018 start year at 488 per year (2440 over 5 years, 7320 over 15 years).**

The Cabinet Report July 2018 arrived at a figure of 12045 over 15 years, 803 per year for the minimum number of homes using the Government Standard Method but the previous ONS 2014 based projections and a 2016 start year.

We cannot relax in our efforts; there is still pressure on our Green Belt and the Council may decide not to work on the basis of the new projections.

In addition to the Cabinet Report:

Wirral Council's "SHMA" completed in May 2016 indicated a figure of 875 new dwellings per year between 2014 and 2032.

The Liverpool City Region "SHELMA" study arrived at figure of between 737 new dwellings per year based on 2014 household data, uplifted for affordability and a "Growth Scenario".

We believe that in the light of the new ONS projections the Council cannot rely on any of these previous assessments.

3 Housing Land Availability

The July Cabinet analysis on page 9 provided for an estimated supply of 7635 new dwellings and added a provision of 1100 for Wirral Waters bringing the total to an estimated supply of 8735 new dwellings. Using the demand figure of 7320 from above, would make a surplus of 1415. About half this surplus would be taken up by offsetting demolitions.

There is no shortfall even with only 1100 dwellings at Wirral Waters over the 15 year Plan period. Even with these new projections The Heswall Society believes that there should be the maximum provision for regeneration at Wirral Waters and other areas because it is important to restore those areas and there may be other policy decisions at national or local level to provide more housing.

However, we believe there are fundamental flaws in the Council's calculation of housing land availability's described below.

4 Other important issues.

Wirral Waters - The original Wirral Green Belt was "tightly drawn to support regeneration". There remains an enormous amount of regeneration still needed in Wirral, in the older housing areas and at Wirral Waters. The Council has only allowed for 1100 dwellings at Wirral Waters before 2035.

Peel Holdings has written various letters outlining its commitment to Wirral Waters, most recently to Margaret Greenwood MP. It wrote "In March 2018, we announced three major housing projects that will bring over 1000 new homes to the area over the next three years. This is of course is only the start of housing delivery."

In the Society's view 1100 homes should be allocated to the first of the three Plan Periods (to 2025). In an earlier letter to the Council Peel has said that, in total, as many as 6450 could be delivered during the period to 2035. We recognise that ongoing projects depend on investment in transport and infrastructure, environmental improvements and energy and technology infrastructure but even Green Belt sites are not without their challenges. The Council should make provision in the period between 2025 and 2035 for a further 5350 homes at Wirral Waters. **This would significantly exceed the Council's July Cabinet shortfall of 4990 and contribute to a surplus when using the new ONS projections.**

Buffer - In its briefings the council stated that 12,000 additional dwellings are needed. It had estimated the 15 year shortfall at 4,990 to which it has then added a further 20% of the 12,000 (ie 2400 dwellings) to meet a "National Planning Policy Framework" (NPPF2) requirement arising from previous under-delivery. The Council had misinterpreted the NPPF2. This requires a buffer to be "moved forward from later in the Plan period". It does not increase the total number of dwellings to be provided, merely their timing. Furthermore, the number brought forward should have been no more than 20% of the first 5 years not 20% of the full fifteen year requirement. The shortfall should remain at the unenhanced figure of 4990. **With the new projections the buffer need only be 5% or 10% and, again, is simply an amount moved to the first five years from later in the 15 year period.**

Windfall Sites - The Council has provided for 60 sites per year which are not foreseeable in advance but which arise as the years go on. Based on our experience we think this is low. Furthermore the Council has recently confirmed that it can take account of the reuse of empty properties where it can demonstrate that an active programme is in place in accordance with average past performance. This should be included in the allowance for 'windfall' sites over the plan period. **During 2016 / 17 the Council states that 290 properties were brought back into use.**

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In the light of this, the Council should review both its historic achievements in bringing properties back into use, review windfall application rates and recalculate its previous housing delivery numbers. It should also include more realistic numbers in its future projections.

5 National Guidance The NPPF2, revised and issued in July, states:

136. **"Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans."** In our view this new requirement for exceptional circumstances to be **"fully justified and evidenced"** reaffirms the Government's support for preserving the Green Belt. In our view the Council's Review does not meet this or other requirements in NPPF2

6 The Sites. - The Council has eliminated some areas from further consideration for removal from the Green Belt and has published a plan of those areas which it proposes to investigate further.

We support the Council's decision that land lying between the Wirral Way / Davenport Road and the estuary should remain in the Green Belt. We believe it important to register support in response to the consultation. The Council says the land has not been included, because of the role of the Wirral Way in defining a clear physical edge to the existing urban area and constraints associated with the national and international designation of the Dee coastline.

We note that Appendix 16 of the Council's Review explores the issue of Infill Villages in the Green Belt. It identifies a number of locations between the Wirral Way and the Estuary where "potential infill opportunities currently appear to exist." The Wirral Way is an important recreational amenity for local people and visitors and is also of historic interest, being the first designated country park in England. It particularly serves the requirements in para 141 of NPPF2 that "Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use". Although there is development to the east of Davenport Road, the area between Davenport Road and the estuary is largely undeveloped and it remains a key part of the Wirral Way. The Local Plan should also take into account the proposed Birkenhead to Welsh Border section of the proposed English Coast Path. Development of parcels SP096 (part), SP100, SP101 would reduce the openness of the land between the Wirral Way and the Estuary and conflict with the reasoning behind continuing to include this area in the Green Belt. There are several other identified potential infill sites which we have yet to consider.

We suggest local people, who know the areas well, should submit their comments on the individual sites which are listed in Appendix 16 of the Council's Development Review.

The Council has identified six Green Belt sites for further investigation in respect of Green Belt boundary revision which lie wholly or partly within Heswall Ward. We have yet to prepare The Heswall Society comments on these sites but we suggest that people with local knowledge should make their views known. The Sites are SP062 to the north of Whitfield Lane, 3 sites SP058C, D and E towards the end of Pipers Lane, SP071 between Premier Inn and Darlington's Yard, SP109 in Boathouse Lane.

The Heswall Society is still working on its response to the Council's Consultation and some points in this note may change. However, we encourage all residents to carefully consider the Local Plan Development / Green Belt Review and to comment online at wirral.gov.uk/localplan or to The Forward Planning Manager, Wirral Council Economic and Housing Growth, PO Box 290, Brighton Street, Wallasey, CH27 9FQ. By 5pm on 26th Oct. - **It's your Green Belt.**