

**The Heswall Society Comments on
ECC 5.6 Wirral Site Specific Landscape Sensitivity Assessment
- Addendum**

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' .

The NPPF 2019 is explicit in its requirement for development plan policies to protect and where appropriate, enhance the natural environment. LUC's approach builds on the process set out in An Approach to Landscape Sensitivity Assessment (Natural England, 2019), which replaced previous studies on the topic. The LUC's approach is up to date, with vigorous assessments and with full compliance in relation to the NPPF's criteria. In line with Natural England's approach, the LUC's study uses carefully defined criteria so that judgements can be clearly traced back to the underlying landscape and visual baseline. Criteria selection is based on the attributes of the landscape most likely to be affected by residential and employment development. It considers both 'landscape' and 'visual' aspects of landscape sensitivity and those relating to value. The Addendum also reinforces previous assessments and culminates in its recommendations concerning the re-vamping of some LLD's across the Borough. It also should be noted that ARUP's Green Belt Review in assessing weakly, moderate or strong performing parcels against the NPPF, excludes such factors as agricultural grading, landscape characteristics, ecological and archaeological factors, just to name 4, and therefore its conclusions are seriously flawed. ARUP chose a very narrow set of criteria upon which to base its conclusions for such a major issue.

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

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.

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

1. Before commenting on the Addendum (ECC5.6), the Heswall Society would like to comment on ECC 5.5 and specifically on Plots SP058 C,D and E.

1.1. The Report states of Landscape Character:

The area (incorporating SP058C, SP058D and SP058E) is situated in the south-west of the borough and lies to the northwest of Heswall. Residential properties lie along its eastern and southern boundaries and the Wirral Way (Long Distance Footpath / National Cycle Route 89 and part of Wirral Country Park) forms the south-western boundary, with field boundaries defining the northern edge of the area. Piper's Lane bisects the area (marking the division of the land parcels).

There is a long standing footpath through SP058E linking onto Pipers Lane

In 1967 the Court of Appeal refused the appeal of an ancient highway maintainable by the public as far as Kitts Field. Examination of Tithe Maps shows that Kitts Field is glebe land lying at the furthest extremity of the track which is a continuation of the bitumen surfaced section of the lane. Kitts Field is a narrow field which separates this extremity of Pipers Lane from The Dungeons (see Appendix).

Clearly there is a public right to pass along this ancient highway, as far as Kitts Field, passing through its old field boundary landscape and ancient hedgerows.

The footpath from the Wirral Way presents the opportunity to explore the landscape of SP058C and D together with the old field systems and hedges to the North.

The foregoing increases the landscape value of SP058 C,D and E

1.2. The Society would add to "guidance" a recommendation to improve awareness of access along the length of Pipers Lane to Kitts Field by signposting and marking of maps (including the link from the Wirral Way. We would also add a recommendation to explore extending access over the short length of Kitts Field to The Dungeons Footpath.

1.3. In addition to specifically commenting on this consultation the Society would also wish that the footpaths from the Wirral Way to (a) Pipers Lane and to (b) Kitts Field are included on the footpaths register. The accompanying map is taken from Wirral Council "Walk Wirral South-West Wirral" first published 1997. It shows the link from the Wirral Way to Pipers Lane as a footpath; the extension of Pipers Lane almost to The Dungeons with the end marked no access to (Dungeons) footpath. (Refer to Appendix below).

2. Wirral Site Specific Landscape Sensitivity Assessment Addendum 2020

SP 062 – The Society has nothing to add to the Report on this area.

SP 064E - The Society has nothing to add to the Report on this area.

SP 071 - The Society has nothing to add to the Report on this area.

SP 0109 - The Society has nothing to add to the Report on this area.

Area Reference 7.5 - The MEAS reports included specific references to SHLAA 1939 and SHLAA 1968 which are SP103 and part SP105 respectively, wherein due to Ecology and Archaeology factors the overall rating was red alert, i.e. adverse factor against development. They also stated the following:-

"Significant deliverability constraint. Further assessment and evidence gathering unlikely to resolve deliverability at either allocation or planning application stage. **Recommended do not Progress.**"

Similar red alerts were expressed for SHLAA 1967, land at Wittering Lane, SHLAA 1973 and SHLAA 3045, Westward Ho, Broad Lane

Based on the above statements, etc., it is essential that all the coastal parcels areas are removed from further consideration re development and removed from any further sites under investigation next issue of the Local Plan.

Appendix: Map showing footpaths referred to above



Suggested walk routes

Public Rights of Way:

- Footpath
- - - Bridleway
- · - · Byway

Other Paths:

- Footpath
- - - Bridlepath
- · - · Cyclepath

1 Public rights of way numbers

♿ Paths suitable for wheelchairs/pushchairs

< Shallow slope

⏏ Steep slope

🚉 Railway station

🏠 Residential

🌳 Country Parks/Public Open Spaces

🌊 Rivers/streams

🌊 Accessible ponds

🚌 Bus stops

🅑 Car Park

🏠 Public Houses

☕ Cafe

🚻 Toilets

🏪 Kiosk

🗿 Viewpoint

📄 Information

🍷 Picnic site

🏰 Church

--- Wirral Borough Council Boundary