



## **The Heswall Society response to H5 Wirral Housing Density Study 2021**

### **General Comments**

The driving force behind the Urban Imprint study is the fact that the Council is sticking to the 12,000 housing requirement over the period of the Local Plan. This estimated housing need has been calculated using the Government's now widely discredited Standard Method. In the case of Wirral, the method has been shown to grossly overestimate Wirral's true housing requirement which is actually in the order of 4000 dwellings over the 15-year Local Plan period. In addition, Urban Imprint's approach assumes that there is an acute shortage of developable land space within Wirral, this despite the fact that Wirral Council state that they have identified sufficient brownfield land to cover Wirral's (inflated) housing needs over the plan period. (This contradicts the authors' contention that Wirral is unlikely to achieve required supply from land identified on the brownfield register). The combined effect of these factors is used to erroneously argue the need to increase current actual densities and indeed provide new land for residential development.

The Urban Imprint study highlights the fact that Wirral Council has been traditionally conservative in housing densities. There is a good reason for this: Wirral has not needed, and at the present time does not need, to employ significantly higher densities to satisfy its real housing need. Whilst land utilisation should always be used wisely, and densities increased where appropriate, much more important for Wirral is to improve the quality of its current housing stock.

Use of the housing densities proposed would result in housing numbers/types very far removed from those currently existing. While change is inevitable, changes should be gradual and spread over time to allow communities to come to terms and accept them. The change in densities proposed would be far too extreme, and thus not be acceptable to communities. Also, although paragraph 122 of the NPPF does highlight the need for the efficient use of land, it also emphasises the need to retain the character of an area. The report, although alluding to this requirement, conveniently offers no real solution as to how local character can be retained in areas where densities are proposed to be significantly increased. In addition, the analysis shows that Wirral, currently, is employing a wide range of housing densities within regions and areas and is already achieving higher densities in some.

This, together with arguments in the preceding paragraph, bring into question why a rigid density approach to development, as recommended in the report, is needed. For the same reasons, why should any minimum density need to be set? As the authors acknowledge, local heritage, environmental factors, and local character and appearance all also need to be taken into account.

The authors refer a density-based policy approach being key to sustainable development. Sustainability requires an integrated approach covering economic, environmental and social dimensions. The focus of the report is on the economic aspect. It mentions the environment primarily as a restriction and totally ignores the social dimension. It is important that Wirral residents are consulted on any proposed changes, and that they are brought with development changes as opposed to such changes being tried to be forced upon them. Also, the report acknowledges that there has been no consideration given to amenity, open space or public realm requirements.

The authors report that the majority of areas investigated had 2 or 2.5 storey developments. It is important that this remains the future norm for the character of these areas to be retained. It is also reassuring to note that the report clearly states that achieving higher densities does not need to rely on apartments, but can be achieved with terraced houses, villas and semis. This reinforces the statement that suburban transit zone densities will be able to be delivered using dwelling types that are commonplace within Wirral.

The report suggests that in Transit Areas (Zone 3), car provision should be reduced as, by definition, houses in this area are within a 10 min (1Km) walk of a train station. This assumes that residents in this zone are physically able to do this. If rigorously adopted, this approach would severely restrict who might be able to live in the area in the future as it would discriminate the (ever increasing) ageing population, and the physically weak, which is contrary to the principles of diversity.

The report suggests a process to assess that the whole of Wirral establish a density-based approach to future development. Such an approach, if done correctly, would be very time consuming and outwith the timescale set for the current Local Plan. It is also questionable whether the Council has the manpower or funds to complete such a task. It is hoped, therefore, that the Council are not tempted to cut corners and turn the 'examples' provided in the report into Local Plan options.

## Heswall Specific Comments

Wirral has no need to release Green Belt for housing and therefore any suggestion to include such a zone is unnecessary at this time.

### *Heswall Transit Area (Zone 3)*

The report indicates that train times are frequent from this station. In fact trains run only every hour on Saturdays and weekdays and less regularly on Sundays. Also, to get to Liverpool a change at Bidston is required. In addition, car parking is very limited and there is no disabled parking. It would appear that the authors have been somewhat judicious with the truth and it would be very dangerous to use this as a basis for defining the area as a suitable Transit Zone.

### *Briar Drive Heswall – Suburban (Zone 4)*

This area lies close to central Heswall facilities and, as identified in the report, comprise semi-detached houses of similar character. No attempt to change the character of this area should be attempted without the clear agreement of local residents. There is also an indication in the report that with long rear gardens backland development may be possible. The Council has resisted such developments in the past and there is no good reason why this policy should change.

### *Andrews Walk – Suburban (Zone 4)*

This is a very quiet area in Heswall, primarily comprised of detached bungalows, that has a very distinctive character. No attempt to change the character of this area should be attempted without the clear agreement of local residents.

### *Land adjacent to Chester Road, Gayton, Heswall – Urban Edge (Zone 5)*

#### *UI Code UI\_UE1*

The report conveniently ignores the fact that this piece of land is in the Green Belt. As argued in the opening paragraphs, Wirral has no need to release Green Belt.

## Summary

The basis for this report is predicated on the erroneous assumption that there is a shortfall of land on Wirral to satisfy its real (as opposed to predicted) housing need. The proposal for the Council to switch to a rigid density-based approach to planning is therefore unnecessary. The report itself demonstrates that the borough is already employing a wide range of densities for housing and there is no need to change from this flexible approach into the future. Surely it is better

to treat each planning application on a case by case basis considering not just the potential for a density increase, but also the character of the area, amenity, open space, public realm requirements etc. The broad brush approach, as recommended, ignores significant differences within areas and, in the Society's view, is of questionable value.

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