

From: [REDACTED]
To: [Local Plan](#)
Subject: Wirral Local Plan - Consultation on Main Modifications
Date: 28 October 2024 10:32:12

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To:- Wirral Local Plan Examination Planning Inspectors

[REDACTED]

On behalf of Frankby Conservation Area Advisory Committee.

Dear Sir/Madam,

We have read and agree to the 'Consultation Data Protection Notice'.

We have followed the stages of development and support the Wirral Local Plan, and wish it to be adopted asap (as it is long-overdue and vital for the future of Wirral) and is 'Sound'.

We continue to support the approach and work of Wirral Green Space Alliance (WGSA) and confirm WGSA speaks for us in their Responses, we wish the Responses given below to be considered, recorded and counted as distinct Responses in their own right.

We very much support the confirmation that "exceptional circumstances to justify alterations to the Green Belt boundaries set out in national planning policy do NOT exist in Wirral".

We support the Local Plan with the Total Supply figure of 11,814 net additional dwellings over the Plan Period (up to 2040) as it more than adequately caters for Wirral's real 'Housing Need'. I/We also support the recognition that the figure is "a reflection of

levels that are currently demonstrably deliverable or developable” with the expectation that further sources of Supply will become available over time and as ‘Regeneration’ improves Market Confidence.

For reasons given regarding MM3 and noting the Council followed legal advice in calculating ‘Housing Need’ (applying out-of-date Government-preferred Data to the ‘Standard Method’ producing a ‘Need’ figure acknowledged to be inflated), we nevertheless support the Plan as it is considered to be good and ‘sound’ overall, is an urgent and overdue necessity to direct and control Development and Growth, but also because the first ‘Plan Review’ would give the opportunity to adjust the ‘Housing Need’ basis to recognise best practice and accurate Data (including Local Authority-level Census Data), thereby reducing the level of risk to achieving the required Delivery. It is our suggestion therefore that an additional note be included reflecting the suggestion that the first Review after Adoption of this Local Plan be undertaken using the best and up-to-date Data, methodology and a locally ‘Objectively Assessed Need’.

We consider that modification of the text has gone too far, resulting in the watering down of prescriptive protection of ‘Best & Most Versatile’ (B&MV) Green Belt Agricultural Land and also there is no mention of the Council Policy (unanimously voted through) NOT to release ANY ‘productive agricultural land’ for development, thereby maintaining or enhancing the Rural Economy and ‘food security’ which is increasingly vital in an uncertain world of conflict, international competition, depleted Nature, and Climate Change.

New Para A: the sentence, “areas of poorer quality land should be preferred” would be better to read, “areas of poorer quality land must be prioritised and instances of non-use justified.”

New Para B: the addition of, “significant” in the phrase, “significant loss of agricultural land” is supported but undefined

as to extent. Suggest adding, “in the opinion of the Council”.

Kind Regards,

Felicity Povoas,

Frankby Conservation Aea Advisory Committee