Wirral Local Plan Consultation on Main Modifications 30 October 2024

To:-localplan@wirral.gov.uk

To the Wirral Local Plan Examination Planning Inspectors:

Dear Sirs,

The following Statements apply to each "Modification" to which I respond below:

I have read and agree to the "Consultation Data Protection Notice".

I have followed the stages of development and support the Wirral Local Plan and wish it to be adopted AS SOON AS POSSIBLE (as it is long-overdue and vital for the future of Wirral) and is "Sound".

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

a) Regarding MM1 (Delivering Growth through sustainable low carbon regeneration):

I very much support the confirmation that there are NO "exceptional circumstances" to justify alterations to the Green Belt boundaries set out in national planning policy.

b) Regarding MM3 (Housing Need); also MM5 new Para D; MM65 re Appendix 4, and MM6:

I have always considered the target supply figure to be massively overestimated given the population growth of under 500 in the last 10 years. However, I 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 also support the recognition that the figure is "a reflection of levels that are currently demonstrably deliverable or developable". Further there is the expectation that further sources of Supply will become available over time and as "Regeneration" improves Market Confidence.

c) Regarding AM32 (Housing Need):

For reasons given regarding MM3 and noting the Council followed legal advice in calculating "Housing Need" (applying out-of-date Government-preferred Data to the "Standard Method" producing a "Need" figure acknowledged to be inflated), I nevertheless support the Plan as it is considered to be good and "Sound" overall and is an urgent and overdue necessity to direct and control Development and Growth. I must hope that the first "Plan Review" would give the opportunity to adjust the "Housing Need" nearer to the reality for Wirral using best practice and accurate Data (including Local Authority-level Census Data), thereby reducing the level of risk to achieving the required Delivery. It is my great hope that an additional note be included re 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".

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d) Regarding MM40 (Policy WP8 Policy for the Rural Area – Agricultural Land):

I 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. Further, one must be concerned about this permitting actions to downgrade agricultural land and so remove it from protection. E.g. land that has not been maintained for 20 years due to "Planning Blight". Given the country can barely produce 50% of its food needs, the loss of ANY farmable land (however classified) must surely place the safety and security of the country at risk with high dependency on uncertain imports. This would be a slow form of national suicide. There is no mention of the Council Policy (unanimously voted through) NOT to release ANY "productive agricultural land" for development, to which I would add any land capable of production, not just currently in production, ref "Planning Blight" above.

New Para A: the sentence, "areas of poorer quality land should be preferred" must surely require the land to be analysed before release to avoid losing ANY farmable land, as above.

I would also add that the contribution to "carbon capture" from farmland / Green belt land / greenspaces etc. MUST be considered in any application to develop thereon.

Kind Regards, T Neil Parry