

**From:** [REDACTED]  
**To:** [Local Plan](#)  
**Cc:** [REDACTED]  
**Subject:** Wirral Local Plan – Consultation on Main Modifications - [REDACTED]  
**Date:** 07 November 2024 19:49:50

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[REDACTED]

To the Wirral Local Plan Examination Planning Inspectors:  
Dear Inspector/s

The following Statements apply to each ‘Modification’ to which we respond below:

- 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, but we 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):  
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”.

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

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For reasons given regarding MM3 and noting the Council followed legal advice in calculating ‘Housing Need’ (applying out-of-date Government-preferred Data to the ‘Standard Method’ producing a ‘Need’ figure acknowledged to be inflated), we nevertheless support the Plan as it is considered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 in Wirral, 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 to confirm that an assessment

will be undertaken as part of the first Review after Adoption of this Local Plan using the best and up-to-date Data, methodology and a locally 'Objectively Assessed Need'.

d) Regarding MM40 (Policy WP8 Policy for the Rural Area – Agricultural Land):  
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 meaning of the sentence, "areas of poorer quality land should be preferred" would be clearer if substituted by, "only areas of poorer quality land must be prioritised with justification of why they are not in use for agriculture or natural capital."

New Para B: the addition of "significant" in the phrase, "significant loss of agricultural land" is supported but undefined as to the extent. Suggest adding, "in the opinion of the Council".

Yours faithfully,  
Andrew Brockbank  
Lesley Brockbank