# Guidance for WGSA Groups, their Members and other interested parties for their Responses to the final Wirral Local Plan Consultation

#### Note: Text in Black and Red is information. Text in Blue is a suggested Response to be emailed to the Council.

The **Wirral Local Plan** is now in the final stages before it can be '**Adopted**' and become the legally binding development plan for Wirral, to which all development in the Borough must adhere up to 2040. After a long 'Examination in Public', when many parties, including **WGSA** (Wirral Green Space Alliance of 30+ Groups), presented their detailed case for the **Plan's** contents, the **Independent Inspectors** have concluded that the **Plan** can be found to be '**SOUND**', namely that it is based on a strategy which meets objectively assessed development and infrastructure requirements.

As is normal, at the end of this lengthy 'Examination', involving scrutinising the 370-page Submission Draft Plan and supporting documents, the Council and Inspectors have agreed 'Modifications' to some of the details and text but the **STRATEGY**, a Local Plan based upon 'Regeneration' and some limited development within existing urban areas but with *NIL RELEASE OF GREEN BELT*, is intact. This is a considerable achievement, a first we understand for a Local Plan, and one which seeks to tackle and reduce inequalities, to enable all communities to thrive whilst preserving **green spaces**.

### BUT, there are still those wanting to build on Green Belt, so we need your help once more.

We need as many people as possible to send in a **Response** to this last stage Consultation.

Changes prompted by the Inspectors are called 'Main Modifications' (MMs) and those by the Council 'Additional Modifications' (AMs). Only the MMs are required to make the Local Plan both 'Legally Compliant' and 'SOUND', although comments are invited on either or both categories.

The full Consultation Documents involve hundreds of largely technical pages and 321 Modifications. We do not consider it practical for most Members or the Public to wade through all this information and respond using the **8-page online Response Form** to <u>each</u> edit. **WGSA** has reviewed all Documents and supports the Plan proceeding as modified. We will be expressing **support** but also commenting where we suggest some preferred wording or to point out the odd omission.

So, for interested parties, we provide below a simplified **sample Response** to a few critical items for use (by copy-and-pasting the text in **BLUE** below) or amend to form one's own wording, **BUT**... THIS NEEDS DOING BEFORE THE <u>DEADLINE</u> OF 5PM on FRIDAY 8TH NOVEMBER 2024, please!!

If preferred, the full documentation for the Consultation may be accessed through the LINK : <u>https://www.wirral.gov.uk/planning-and-building/local-plans-and-planning-policy/wirrals-new-local-plan/new-local-plan</u>

# Sample Response to the Wirral Local Plan Main Modifications Consultation:

Email your Response(s) to: localplan@wirral.gov.uk

#### Mark your Response email:

'Wirral Local Plan – Consultation on Main Modifications'

(due to be the last one!)

#### Add the Statements 1 to 5 and Responses a) to e): (For 'I/We' or 'my/our', delete as applicable)

- 1. To the Wirral Local Plan Examination Planning Inspectors: Dear Sirs,
- 2. The following Statements apply to <u>each</u> 'Modification' to which I respond below:
- 3. I have read and agree to the 'Consultation Data Protection Notice'.
- **4.** I 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**'.
- **5.** 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 "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:

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" 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), **I 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 my 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'.

## 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 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, "<u>significant</u> loss of agricultural land" is supported but undefined as to extent. Suggest adding, "in the opinion of the Council".

# e) Kind Regards, Lushanthi Edirisooriya