

DOR REF	RESPONSE
DOR00001	Please don't build houses on our precious green belt. Also don't chop trees down!
DOR00002	I strongly object to the release of any Green Belt land in Wirral and in particular in Irby where I live. Irby is an old and established rural village area of which the green areas form an integral and important part. Any use of these green spaces to build houses which are not required would be an outrage. Irby does not have access to the Mersey Rail Network and the public are reliant on one bus which runs through Irby. Any additional increase in housing would put enormous strain on the infrastructure of this small village its transport, doctors surgery, school etc. Parking is adjacent to one of the Green Belt sites identified as possible release - Limbo Lane and adjoining fields. This area has a pond, Newts, which are protected species, and other wildlife which would surely be severely disrupted. There is also a right of way. The access to this land is very restricted meaning that access could only be gained via Parkway - a small cul-de-sac. The main road adjacent Thingwall Road/Thingwall Road East is a minor road and could not cope with the additional traffic as a result of any additional housing. Additionally, there have been several serious and fatal accidents on this road in recent years and any additional traffic would surely increase this risk. I would also urge you to review Wirral Borough Council's sale of a large parcel of land in 2011 to Peel Holdings who promised at that time to build 13,000 houses. No houses have yet been built and the Council seems incapable of either forcing Peel to proceed with the construction of houses agreed upon or to take back the and by compulsory purchase. Either of these actions would solve the problem created by the Government demands for additional housing.
DOR00003	As a member of Storeton Village, we have many features and loads of history. Already the Lever Causeway is a high speed race track from dawn to dusk. My mind boggles at the consequences of any major development.
DOR00004	You are supposed to be building homes for family's not homes for the better off. I am writing to oppose your plans to build on the Green Belt area, near our home. There are plenty of brownfield sites to use up first before even thinking about Greenbelt Land. We have lived here 18 years, in that time there has been an increase of traffic Wagons, and Buses uses it as a short cut. We could open our windows when we first move here, now the traffic fumes are too strong. My wife and I are both asthmatics, so your proposal for more traffic extra noise as well. Lever Causeway is used as a race track now so you want extra traffic from all these houses to converge on to an already busy road. It is already dangerous as it is on the footpath it is used for walkers, cyclists and horse riders or are you going to do away with the bridle path. We will no longer live in a nice area but a huge housing estate. Where is all the extra Doctors Hospital Transport coming from? We cannot manage now.
DOR00005	SAME AS DOR0004
DOR00006	I am writing to express my concern and objection to the release of any Green Belt land for building properties. I feel having Green Belt is beneficial to our communities and growing children. Greenery contributes to clean fresh air and less pollution. I chose to live where we live based on the environment. I believe there are other options such as the Peel Holdings land. I am also concerned that a reduction of Green Belt land will have a negative impact on wildlife. I also think that farmland should be encourage rather than destroyed.
DOR00007	I write to register my concern about the impending loss of our green belt areas. Please do not take these away. It will maybe solve an immediate problem regarding building of properties but in the long run, I feel that it will cause greater problems in the future.
DOR00008	<p>a) Application for the Re-designation of a Community-Led Neighbourhood Planning Forum for Hoylake b) Application for the Designation of a Community-Led Neighbourhood Planning Forum for Devonshire Park c) Withdrawal of Designation of Birkenhead and Tranmere Neighbourhood Forum Thank you for the above letter; we have no comments to make. Wirral's Green Belt. We understand that a new document will be available after July 23, 2018 and we look forward to receiving notification of it as soon as possible. We intend to respond in detail.</p> <p>Wirral Local Plan Consultation.</p> <p>Green Belt Proposals:</p> <p>These comments relate to Bromborough & Eastham Wards areas all of which are under threat from these proposals. We wholly support the detailed representations from, for example: Eastham Village Preservation Association and Cheshire Wildlife Trust, Wirral Group, as well as responses from local individuals. We list the potentially threatened sites with a detailed objection to the last one:-</p> <p>SP048 Lowfields Woods Eastham Ward</p> <p>SP050 West Of Rivacre Road Eastham Ward</p> <p>SP051 East Of Rivacre Road Eastham Ward</p> <p>SP052 Eastham Village Conservation Area Eastham Ward</p> <p>SP053 St Davids Road Eastham Eastham Ward</p> <p>SP055 East Of Ferry Road Eastham Eastham Ward</p> <p>For the 6 above, see comments by the groups listed above, which we support wholeheartedly.</p> <p>SP054 North Of St Davids Road Eastham Bromborough and Eastham Ward</p>

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	<p>This whole area apart from SP054A and The Warrens is all used for recreation purposes:- tennis, football, rugby football, cricket, golf, dog walking, running track, rambling, caravan weekends, prams/pushchairs along green lane, disabled people in wheelchair's and others wishing to goto eastham woods, eastham ferry area etc. Green lane has been a right of way for at least 200 years verifiably.</p> <p>The Current Usages Should Be Respected – No Houses Or Other Usages.</p> <p>Please note APP/00474/2017 approval was granted for a new CLUB HOUSE on an area South of Green Lane, subject to various conditions. A 'Public Notice' article in the WIRRAL GLOBE on 29 August 2018 (reference PAR/LHRAM/42223) was for an application to dispose of the land – for which permission had been granted to build the new Club House. It may be that the Club House permission would be taken forward to allow the purchasers to apply for grants to fund the new building.</p> <p>N.B. We are aware that, after all, there may be enough Brownfield Land to satisfy the number of dwellings that are really needed, and so avoid using any Green Belt land at all. Such housing should be near established facilities and be affordable and accessible; Green Belt cannot really supply these needs.</p> <p><u>ELPS 242 Slack Wood (Shadwell) Bromborough Ward</u></p> <p>This site has been subject to several planning application over recent years. Not one of these applications has included an Archaeological desk based assessment although we have consistently emphasised its great historical and heritage value, backed up with detailed documents and map. Moreover when the five local authorities set up in 1974, requested that a Merseyside Sites and Monuments record (now the Historic Environment Record) to be established for each Authority. This was to inform future Planning applications and Hazard Maps based on up to date ordinance survey maps were duly carried out using documentary and field research, done in a thorough and satisfactory way.</p> <p>Slack Wood (Shodwell) was most definitely included. Somehow, none of the various applications referred the records this provided. It appears that for a short period that Hazard Map sheet was not available [a Council Officer] made sure that the matter was rectified immediately. However the 2011 application (APP/11/00823) merely stated that showed any finds be made, they would be reported – the relevant Planning Officer then requested that a professional Archaeological Desk based assessment be presented – that apparently has not happened.</p> <p>Two matters of considerable concern have happened, without permission it seems:-</p> <ol style="list-style-type: none"> 1. Removal of trees without any warning and no contact with the Councils Officers. 2. Considerable ground work, again no warning at all and potentially damaging. <p>Local concern and contact with Council Officers halted the above, for the time being. (Please see attached documents for all details)</p> <ol style="list-style-type: none"> 1. Aerial view published March 2000. Riverview Road extension affecting Slack Wood. 2. Aerial view 2010 showing Slack Wood illegal path & pit but still well wooded. 3. Article re damage 2016 test & photograph (enlarged) 4. Letter dated 2011 re Coastal footpath. 5. Notes dated 2010 re Coastal footpath 6. (Reverse of 5) 1872 O.S. map, showing remaining Cottages & Lime Kiln. 7. Shodwell article from "The Eastham Archivist" 2011 (3pp) 8. "Bromborough in Times Past" Millennium Edition (4pp) 9. 1836 map by Dawson (courtesy of The British Library) <p>FURTHER COMMENTS.</p> <p>It would appear that none of the items listed above and shown in the attachments herewith was available to those compiling the detailed description of the site in the local plan. Over the years we have constantly and carefully provided documentary and map evidence recording the important history of the site – A very significant part of Bromborough's Heritage. There is no mention of it in the "restraints" column in the local plan, by contrast the "Epichem" site and land. ELPS 364, details the environmental restrains we do not understand why Slack Wood (Shodwell) site has not been highlighted for its own historical importance and archaeological constraints. Please ensure that those in the council working on the local plan are aware of this and will act accordingly.</p> <p><u>SHLAA 0683. Land at The Rake</u> (adjacent to Park View)</p> <p>Proposal: 18 dwellings Bromborough Ward. Please remove this entry from the "Proposals" list. When the then Council estates of affordable rented homes was commenced in 1925, in response to desperate local need and encouraged by the Government of the day, strict rules were laid down including green spaces as an integral part of the visionary plan. After the halt in building (nationwide) during World War 2, this part of the estate, west of Ashfield Road was built following the original plan. The name "Park View" was chosen specifically for the road so named, it looks across the well-established park. Any housing proposed for the area in question, one of the green spaces would therefore be totally out of character, and be avoided</p>

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	<p><u>SHLAA 2024. Bromborough Civic Centre</u> Proposal: Demolition of Bromborough civic Centre, including Bromborough Library, to use the land for other purposes (Bromborough Ward) Please remove this whole proposal from the current "Proposal" list. This proposal is most unpopular and entirely unnecessary. The facilities inside the whole building are an integral part of Bromborough Village, providing wide range of activities for the local community. Its proximity to shops and other facilities and the (at present) free car parking and very good public transport make it accessible for all ages and abilities. There has been a Council Library facility on this site since 1937 – at first in the well-remembered Council offices building which stood close by; the next site for the library was at Stanhope House – then back to the new building 1974 purpose built and ideally situated. The Halls host a wide variety of uses for all ages, interests and abilities, the main halls sprung floor is unique in the wider area, and its size can accommodate a large number of people. The toilets are an invaluable provision for all age groups. It is a real help to have Council staff immediately on hand in the building. The foyer often has a very useful function for displaying local work by school children or adults and on occasion a Health review is available or a Council drop-in display for example "Proposed Waste Disposal Consultation" The suggestion of more shops/offices on the site is entirely unnecessary – at present, at least four empty premises exist in the village and appear to be very hard to let.</p> <p><u>SHLAA 2025. Allport Lane Car Park</u> Proposal: suggested mixed uses. (Bromborough Ward). Please refuse this proposal. The free car park is absolutely invaluable and its closure would have a needlessly devastating effect on the local area as there is no such provision nearby. The private car parks and residential roads can be ruled out. Spaces in Allport Lane itself (the part where there are business premises on both sides) are at a premium, and are often full; space there is needed for collections and delivery to the various outlets these can cause double parking briefly thus holding up other traffic including buses. Local businesses, staff and customers would suffer by loss of the free car park; also all the recycling bins are located there. With at least four premises vacant, no more shops are required or businesses either. Local people value Bromborough village. A large number of pensioners find the facilities in Bromborough Village very helpful, not all find getting to the retail park is very difficult and the road crossings there are unhelpful. Besides that, the Post Office in High Street as the other very useful shops and banks and businesses are close together – near the Orchard surgery too. The closure of the car park could lead to several shops/businesses having to close. This proposal would be bound to have unintended consequences.</p> <p><u>SHLAA 00684 216. Allport Road.</u> Proposal: 2 dwellings (Clatterbridge Ward not Bromborough Ward) Please delete this site from the proposals list. The site is entirely unsuitable – in wet weather it becomes boggy and waterlogged. Any attempt to build on the site would require extensive, unnecessary work, which would have the effect of damaging the nearby properties. This can be demonstrated on other similar sites. The water would simply be an unfortunate burden for the neighbours, damaging their amenities.</p> <p><u>SHLAA 3040. Former Acre Lane Resource Centre</u> Proposal: 217 dwellings (Eastham Ward not Bromborough Ward) As you will be aware by now this application was approved albeit by only one vote. It may be said that the huge number of properties envisaged is in the stark contrast to the properties on the opposite side of Acre Lane where the former Council houses, part of the far-sighted planning of the 1920's & 30's seem to offer a more appropriate lay-out, with greater access and more space.</p> <p><u>ELPS 017. Land east of Tulip factory, Riverview Road</u> (Bromborough Ward) This is just a brief comment. It appears that, although planning permission was granted some few years ago, no work has commenced. It has been suggested locally that some at least of the land close to the existing small car park be used as an extension for extra public parking (free) so that people, especially the less mobile, could enjoy the views across the Mersey, and perhaps, enjoy a short walk along the public footpath between the coast and the coastward side of the proposed buildings, this accessibility would improve people's sense of well-being. The new building itself, would have the effect of blocking the view from Riverview Road</p>
DOR00009	I wish to protest at the proposals to build houses on Wirral's Green Belt.
DOR00010	same as above DOR00009
DOR00011	<p>"Green belt land is being eroded at an alarming rate", campaigners warned yesterday. Half a million homes are being planned for Green Belt land which is supposed to stop urban sprawl, said the Campaign to Protect Rural England. Yet it is estimated that local authorities with Green Belt areas have enough previously developed or "brownfield" land for more than 720,000 homes. And in England as a whole, there is enough brownfield land to accommodate more than one million homes. But the CPRE said Government house-building targets fill up more land being ripped out of the Greenbelt for development. This claims contrasts with Theresa May's pledge in March to protect the Green Belt which is supposed to stop towns and suburbs becoming cities.</p>

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DOR00012	<p>I am just writing on behalf of my client to promote a parcel of land by Thingwall Roundabout, Barnston Road, and Thingwall as a potential site for housing development. The site is around 3.1 hectares in size and could therefore accommodate up to 100 dwellings. It is well located on the edge of Thingwall, which is a Primarily Residential Area extending from Heswall and would be considered to be sustainable in terms of accessibility to a wide range of shops, services and employment and means of transport. I understand that the landowner to the south is also making representations and the whole development plot would probably extend to around 8 hectares. It would represent a highly logical place to develop and there are no special landscape or ecological designations that we are aware of that would prevent development of the site. The site is located in the Green Belt.</p> <p>A quick assessment against the 5 purposes of including and protecting land within the Green Belt (paragraph 80 of the NPPF) would be as follows:</p> <ol style="list-style-type: none"> 1. To check the unrestricted sprawl of large built-up areas: Thingwall extends from Heswall, with Barnston Road representing a fairly clear delineation between the built-up area and the countryside beyond. Notwithstanding, there is some ribbon development along the eastern side of Barnston Road and nearby sites which extend into the countryside to the east. Of particular note are the crematorium and cemetery to the north and the caravan storage and garden centre sites to the south. Beyond those sites to the south is the Bupa hospital and Homefield Avenue, which represent significant incursions into the countryside and go beyond the limit of our client's land. It is suggested therefore that the development of our client's land would not appear as incongruous in this context and would not prejudice this purpose to any greater extent than existing development; 2. To prevent neighbouring towns merging into one another: There are no settlements close to the east which would lead to a potential coalescence; 3. To assist in safeguarding the countryside from encroachment: See point (1). In so far as the site is Greenfield land within the countryside, it would represent an encroachment. However, the harmful impacts of the encroachment would be mitigated by the contextual factors as set out above; 4. To preserve the setting and special character of historic towns: Thingwall would not be considered as an especially historic town. The site is not close to a Conservation Area. The adjoining area of Thingwall is comprised of mainly 20th century suburban housing estates and the development of the site would fit well within this context; 5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land: The site is not derelict or other urban land so would not contribute directly, although it would assist in helping to meet the Council's housing targets, thereby assisting in the provision of wider economic benefits. As such, it is considered that the site should be considered as a candidate for Green Belt release. For further support, I understand that there is also developer interest and I would suggest that it is highly likely that the site would be delivered within 5 years.
DOR00013	<ul style="list-style-type: none"> • The Council claim they are being "forced" to release Green Belt by the Government to meet a housing target of 12,000 in 15 years; • The Council's own Strategic Housing Market Assessment (SHMA) in 2016 came up with near identical housing targets - yet the Council did nothing; • A Local Plan determines what can be built where and what land should be protected. Wirral Council have consistently failed to produce a Local Plan, since the previous plan in 2000. Now Wirral Council have been told by the Government that if they do not produce a Local Plan, the Government will do it for them ; • Not wanting to lose control, the Council are now rushing through "Consultations" on the Green Belt review and are preparing a "botched" Local Plan based on over inflated fantasy housing figures; • Government housing targets are based on ONS (Office for National Statistics) population projections over the next 15 years; • Independent Analysis of the Housing Targets by [another respondent] has shown that, using ACTUAL recent local population trends, the target should be between 220 - 350 houses per annum (or approx. 4,300 houses in total). [another respondents] background is in mathematical modelling, statistics and operational research; • Section 44 of The Government's Document "Planning for the right homes in the right places", released in March 2018, states: "Deviation from the proposed method (for calculating housing targets) - Given the significant financial and time-saving benefits, our expectation is that local planning authorities adopt the proposed method (i.e. using the ONS population projections) when assessing housing need. However, there may be compelling circumstances not to adopt the proposed approach. These will need to be properly justified, and will be subject to examination. • We suggest that [another respondent] analysis and documents should be used as a basis to prove that there are "compelling circumstances" not to adopt the Government's proposed method for calculating housing targets. • Why are the Council not challenging the Government's targets, when Government guidance explicitly states that the Targets can be challenged? Why are the Council claiming they are being forced by the Government to release Green Belt Land when, the truth is, is that the Government are simply forcing them to produce a Local Plan like every other Local Authority? • Developers are circling like vultures ready to pick off Green Belt Land. As part of the Council's Strategic Housing Land Availability Assessment in 2016, the Council received submissions from Developers wanting to build on 104 sites across the Wirral. • We are aware of large house building companies aggressively promoting the release of Green Belt Land on the Wirral and also contacting landowners, trying to buy up further land; • There is space for 18000 houses on Brownfield sites on the Wirral, more than enough to meet even the exaggerated targets; • It is not good enough for the Council to say they that Compulsory Purchase Orders for Brown field sites are too costly or take too long. Compulsory Purchase Orders take around 18 months or so a relatively small amount of time when the Local Plan is for 15 years). Wirral Waters has "Housing zone status" which means it is eligible for £millions in government grants to remediate and develop the land;

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	<ul style="list-style-type: none"> • Wirral Waters already have planning permission for 13000 houses. The Peel Group, who own the site, say that with the right public partnership they could build up to 6450 houses during the 15 year Local Plan period; • Wirral Council has already spent over £1million on the Hoylake Golf Resort (with its proposed housing estate of 160 luxury houses). They proposed to spend £17million on roads for the Golf Resort and lend £26 million to the Developer, (who has a dubious record including a history of bankruptcy); • Wirral Council seem more focussed on meeting Developers' needs rather than the needs of the people they represent. The Council's newly appointed Corporate Director of Housing and Economic Growth, is married to the Development Planning Manager for the Peel Group. Surely this is a massive Conflict of Interest? • Wirral Council Leader should drop his plans for the Hoylake Golf Resort and spend the money on developing Brown Field sites in deprived areas to meet our housing needs; • Green Belt land comes with a premium price. Therefore, Green Belt development is usually for expensive executive homes and very few will be affordable housing; • It is scandalous that the Council are proposing to release Green Belt Land for Development, when there are, reportedly, between 2000 and 6000 empty properties on the Wirral. • [Other respondents] analysis shows that the land the Council propose to release from the Green Belt could actually support over 70,000 houses. • Will Wirral Council's Leader abandon his own overinflated figures and abandon his costly Golf Resort Project? Or have the Green Belt sites for release been deliberately exaggerated? Knowing that there will be a public out-cry, will the Councillors try and become Green Belt Heroes and claim they have listened to residents and were able to save some of the Green Belt sites?; • The Green Belt is our green lungs which mitigates against Climate Change. Green Belt development increases traffic and pollution and increases populations in areas without the infrastructure and services to cope; • How can we trust Councillors who say they want to protect the Green Belt but have voted time and time again to build on the Green Belt for the Hoylake Golf Resort?; • Please write to your Councillors and tell them that if the Council challenged the Government's Targets, using actual population trends, and worked with the likes of Peel to build houses on brownfield sites, there would be absolutely no need to release any Green Belt land.
DOR00014	<p>I write to contest the need for housing development within Storeton village i.e. SP030 to SP036. While I understand the need for additional housing throughout the nation and particularly within Wirral Borough it seems very unfair that Green Belt land should be stolen in this way, when numerous brownfield and commercial sites have lain idle for prolonged periods; I think particularly of: a). Bidston dock, which was drained and reclaimed many years ago has lain idle since, b) The western end of West Float, which was cleared and flattened (for housing development, I believe, also some time ago), c) The former Birkenhead Post Office, on the corner of Argyle Street and Back Oliver Street, which has already been empty for some considerable time, d).The former Central Hotel, which has also been empty for many months. I am concerned that the area to the south-east of Lever Causeway (SP033) as far as Rest Hill road often floods during the winter time, forming (at worst) a temporary lake as far as the lowest point of Marsh Lane. Any new houses built in that area would suffer if that should occur and any damage caused to them in those circumstances would impose even greater pressure on the council budget to rectify such damage. The footpath, for use by pedestrians, horse riders and cyclists along Lever Causeway was only installed a few years ago and has undoubtedly encouraged more people to visit the area and enjoy the green fields nearby. The site of more houses in the area is likely to discourage those people and they will have travel further to enjoy the countryside.</p>
DOR00015	Same as statement above (DOR00014)
DOR00016	<p>The following questions are based on "facts" extracted from W.B.C's own "Wirral Compendium of Statistics 2017" Authors of Report ascribe a 95% accuracy rate and in most cases fig's from ONS. 1. Wirral population has been stable for 20+ years (Actual fall of 1,500 persons over that period; (p/12) fig's ONS). Why estimate such grotesquely exaggerated figs, i.e. 12,000 houses? 2. "Homelessness in the Wirral below average" (p.2 of Council's report). Liverpool Echo reported 2nd Nov. 2015, during "Parliamentary answers that ...homelessness in Wirral to be 54 cases..." (Same report stated total for Merseyside of 305 cases). Why so desperate to destroy greenbelt? 3. WBC's population projection over next 15 years shows a fall of 6,544 (p. 14) all ethnicities. Why plunder our children and their children's inheritance? 4. If WBC have quite recently, (2017), published such low statistics then why have they not told Central government that they are wrong and that the people of Wirral know what is best for our families and our environment!</p>
DOR00017	<p>I strongly object to the proposed removal of green belt status to Brackenwood Park and Brackenwood golf course. All land including Storeton, which surrounds the peaceful hamlet of Bebington. My objections are as followed:</p> <ol style="list-style-type: none"> 1. Any further development s would make Bebington a modern sprawl of similar built up areas, taking away most of the green space and character. 2. If building was permitted which is the ultimate aim of this exercise the town of Bebington would merge into surrounding villages e.g. Storeton losing the identity and character of affected areas. 3. The safeguard of the precious countryside would be under threat, nesting local birds e.g. Buzzards, Kestrel, Tawny Owl, nuthatch. Greater spotted woodpecker would lose value habitat as well as badgers and foxes. I will show concerned parties nests and setts. This is only a very small list of the vast diversity of fauna and flora of the areas under question. 4. The open spaces are enjoyed by residents for many recreational activities, including golf, dog walking, rambling, bird watching, all valuable forms of exercise which the government are keen to encourage for health and wellbeing.

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	<p>5. Surely there must be enough brown sites of derelict land which would all benefit by regeneration and investment. I will gladly point these areas out to the planning officers who I believe have overlooked these areas in favour of easier options.</p> <p>After the recent published altered figures by the National office for national statistics I see no reason why you should push ahead with your objectives to cause misery and worry to quite a number of Wirral residents by taking large swathes of land out of green belt. Perhaps I been cynical when I'd always thought the back nine holes of Brackenwood Golf course has longed been earmarked for building. Please prove me wrong.</p>
DOR00018	I wish to add my voice of disapproval in opposing the Council's proposal to allow the building of houses on Wirral's Green Belt land.
DOR00019	We have always been promised that Wirral's Green Belt land is completely safe from any construction or building work being carried out. It would be a crying shame to lose any of our precious Green Belt land as this is one of the biggest tourism attractions Wirral has to offer. Nobody would want to see a Wirral sized housing estate, because that is which would happen if you allow this insane plan to go ahead.
DOR00020	I am writing to complain to you of the disgusting proposals to build on Wirral's Green Belt land when there is plenty of brown field land around Wirral. Peel Holdings have got plenty of which they said they were going to build houses on it to the best of my knowledge I don't think they have built one yet. Also it might be worth thinking of keeping some or a lot of agricultural land for the growth of food crops because we don't know what might happen to our food supply when we come out of the European community. I am sure nobody living in those parts of Wirral earmarked for development wants to see it or to see the Wirral Peninsula end up as one huge town. Because that is how it will end up.
DOR00021	<p>My wife and I wish to make formal objection to the proposed invasion of green belt land, in particular plot SP071.</p> <ol style="list-style-type: none"> 1. The intrusion onto green belt land destroys the first principle of green belt preservation. 2. The present infrastructure will not support it for the following reasons: <ol style="list-style-type: none"> a. The concentration and high numbers proposed will not be conducive to good planning for the area. b. Further extensive building on this plot will lead to dangerous access points or rat-runs and an increase in accidents can be foreseen. c. The two local schools are already subject to overcapacity. <p>Policing in the area has been reduced to a minimum and Police Stations closed, which can only lead to an increase in crime with such population increase.</p> <p>e. Public transport in this immediate area is already inadequate with no proposed improvement envisaged.</p> <p>f. Whilst green belt is preferable to developers with financial interests, has all been due to utilise brown site land?</p> <p>Finally with regard to plot SP071, this is the habitat of much wildlife, some protected, which would be totally lost were the development to go ahead. It shows that this is an important factor to be taken into consideration, particularly with regard to air pollution. [The objection includes a list of birds and other wildlife observed in the area]</p>
DOR00022	<p>We write with reference to the Council's Green Belt Land Grab. Like everyone we are wondering where this fantasy figure comes from and why you are not making use of our brown field sites which we understand with the help of Peel Holdings' land you could well fulfil this fantasy number. We say fantasy because Wirral's population and growth market have been on the decline for many years. The Green Belt is Wirral's gem. Tourism and leisure bring people to the Wirral for sailing activities, acres of rolling farm land, small villages and walks such as the Wirral Way. The Green Belt provides a healthy environment for the families who have chosen to live here. We have lived in Barnston, a small village mentioned in the Domesday Book, for 48 years. It consists of 3 farms owned by an Estate and a private landowner. Both owners are happy to sell for financial gains to developers. The Conservation Society was founded in 1984 and the membership works hard to keep the area tidy, fulfilling jobs no longer carried out by the local council, and in the spring the grass verges are a mass of yellow daffodils all provided and planted by the Society. Apart from a significant rise in traffic, little has changed. Now the council wishes to smother the area in bricks and mortar. We are constantly told to protect the environment, the wildlife etc., but has anyone told the Council only last week, a new report drew attention to the importance of this yet we are having to sacrifice all for the fat developers. We have an abundance of wildlife, rare flowers, butterflies, badgers, bats and birds and Barnston Dale is an SSI. A pit or pond has always been an asset to farmers and in the 70's and 80's the fields to the rear of the Lodge Barnston Road, Barnston Village, were used to dump vast quantities of the waste material from the construction of the M53 and Cammell Laird's dry dock. In the 50's the former brick works, known as the Tiler's Quarry, on the other side of Barnston Road, was filled in with waste from the docks and later Cammell Laird. There is no record of the contamination of the waste material dumped in this area. Only this morning another report was issued 'Transport for new houses'. We don't have a bus service – a car is essential. The infrastructure on the Wirral does not meet current demands and the roads are full of pot holes. People queue to gain access to and leave, the M53 each day. We are a long narrow strip of land, eight miles at the widest, so we can't go anywhere. We wonder what the Council is thinking by even proposing this plan. We know developers would rather build on virgin sites, but the council should make them use the brownfield sites first, and also force owners of empty properties to bring them into the housing system. Before you throw away our green Belt for money, remember once it's gone, it is gone forever.</p>
DOR00023	<p>I was horrified to hear the plans for taking so much of lovely Green Belt for housing. I was drawn to the Wirral from Liverpool in 1972 and have loved being in so much lovely countryside right on my doorstep. Several times over the years the Green area i.e. Park behind my house has been threatened and now we have heard of the current plans for so much of our green spaces for housing. Please enter this letter as opposition to plans.</p>

DOR REF	RESPONSE
DOR00024	I am opposing the uptake of Green Belt in Wirral. It should be noted that there are still Brownfield sites unused. Peel Holdings have held such sites for years - what are they doing with this land? Already, a vehemently opposed project has swallowed up Green Belt in the guise of a fire station at Saughall Massie, when there are fire stations sited on Wirral. The Wirral Peninsula is a small and beautiful place and any increase in building on Green Belt would devalue the whole area. Another point that should be bore in mind - the population of Wirral is in decline, so what are these houses for?
DOR00025	<p>We do not want or require any building on green belt land. Once built on it can never be reversed and the once green and pleasant land is destroyed. The statistics for required housing are incorrect and only serve as an income grabbing exercise.</p> <p>Do the labour councillors really believe that the Wirral residents do not have sufficient intelligence to see through the obvious misrepresentation, misleading, politically motivated and blatantly incorrect information? You have been contacted on many occasions by residents of the Wirral re this disgraceful and politically motivated attempt to destroy the wonderful and irreplaceable Wirral Green Belt. This is not the governments fault. It is the council and councillors who have, by incompetence, drawn the Wirral into this situation. Its time you acted and stopped this flawed and disreputable plan. Wirral's Green Belt, with its splendid views, walks and recreational areas, and the very distinct identities of its various communities, were key reasons why we and many other residents chose to live on the Peninsula and raise a family. All this is now at risk. Its time Wirral Council stopped blaming everyone else and delivered a Local Plan through a process which gives its Residents real participation and reasonable time to determine what is needed and how it should fit in and around THEIR communities. Instead, there is an apparent determination to release Green Belt and reap short term rewards. This was brought home to us recently when a senior Council Officer calmly announced that developers and the Council see greenfield development as simple, quick and lucrative. This is just NOT acceptable. We understand that independent professionals, with a different objective and approach, have demonstrated there is NO need to release ANY Green Belt land to provide in a timely fashion even the original, inflated 'Housing Need' let alone the much lower requirement in line with the latest official growth forecasts. We therefore demand that the people are heard and that the current process is altered to allow proper involvement of Wirral's Residents, free from the present headlong rush, in order to ensure community identity and our glorious Green belt are retained for the continued delight of Residents and Visitors alike, and more importantly for future generations to enjoy. We understand that independent professionals, with a different objective and approach, have demonstrated there is NO need to release ANY Green Belt land to provide in a timely fashion even the original, inflated 'Housing Need' let alone the much lower requirement in line with the latest official growth forecasts. We therefore demand that the people are heard and that the current process is altered to allow proper involvement of Wirral's Residents, free from the present headlong rush, in order to ensure community identity and our glorious Green belt are retained for the continued delight of Residents and Visitors alike, and more importantly for future generations to enjoy.</p>
DOR00026	Along with many others I am writing to protest in the strongest possible sense against the destruction of the green land on the Wirral. You are in charge of the protection of the area, I expect that you should be devising other ways of hitting this target, and we are all very aware of the capacity available BEFORE green belt is touched. I am asking you to stop this action.
DOR00027	The Wirral is envied as a place of beauty and green space heritage. I, as many others before me moved here because of its diverse landscapes and rich history. It saddens me to hear that as a council you have run the risk of having Central Government dictate house building policy, because you have failed to submit plans since 2000. I do not wish to see houses built on green belt sites until the brown belts sites have been effectively utilised. The roads in rural areas already struggle with the volume of vehicles and siting an estate of several hundred houses in areas currently used for farming would bring more chaos. Executive homes do not provide housing for first time buyers. They line the pockets of developers and leave the young families who are trying to get on the property ladder in rented accommodation. Get your act together and defend the things that make this region so remarkable.
DOR00028	<p>If the green belt is released to developers without a proper local plan investigating alternative brownfield sites then local councillors will be held accountable. Storeton residents including myself are extremely unhappy that Council inaction has resulted in unnecessary worry about the impact on these plans on the character of our historic village. Please do everything within you power to commission a local plan as above without delay with emphasis on exploring alternatives to the destruction of Wirral's greenbelt. As someone who lives on Lever Causeway and enjoys the semi-rural location daily for walks and exercise any development would represent a hammer blow to residents' quality of life. The media suggest that encroachment by developers nationally may account for a small proportion of the Countryside but this argument ignores the massive impact on the quality of life of local developments to local people. The greenbelt near Lever Causeway may only account for a tiny percentage of the Countryside nationally but to locals it's one of the few conveniently accessible Countryside we have.</p> <ul style="list-style-type: none"> • There is sufficient land in urban areas to build upon. • 12,000 houses are not needed - the population projection does not warrant this figure • Will fundamentally change the character of the area • The sites either side of Lever Causeway are huge. Once released from Green Belt, building could extend to Storeton, causing unrestricted sprawl, with historic Storeton and Bebington merging. • Lever Causeway and its open spaces provide an area for relaxation and exercise for innumerable local residents. • Mount Road's elevated position currently provides unrivalled views which would be totally destroyed. Any building would cause substantial detrimental visual impact on the remaining Green Belt. • Storeton is an historic hamlet which will directly affected by any building on Lever Causeway. This will cause irreparable damage to its setting.

DOR REF	RESPONSE
DOR00029	I live in Irby, and like thousands of other Wirral residents have been devastated and outraged at the council's recent proposal to release Green Belt land for development. We have chosen to live here because of the quality of life it brings and we are now faced with the real threat (based on very questionable housing and economic forecasts) that our precious Green Belt will be lost forever. I, like many others, am puzzled by the Government's estimate that the tiny Wirral Peninsula needs 12,000 houses over the next 15 years, especially as they have been quoted as saying that the Council's tasks should be simple as Wirral "is not an area of high housing pressure". I understand that this estimate has been produced using a standard formula and I question the accuracy of this "one size fits all" approach. I have read and listened to many opinions regarding Wirral's housing need and the projection of future economic growth. The general consensus of opinion is that both have been vastly overestimated and display a staggering lack of recognition of both local knowledge and historic trends. I therefore believe that it is vital to question the accuracy and validity of this figure. Instead of blaming the government for imposing this target (which no doubt as a result of the Council's failure to produce the Local Plan in the first place!) The Council should be challenging it! A more realistic figure would remove the threat of the Green Belt as there is adequate Brown belt land available for future development.
DOR00030	I am writing to you to urge you to protect the Wirral environment for future generations. The Green Belt is so important for the wellbeing of the people of Wirral and local wildlife. Once it has gone it will be gone for ever! We MUST preserve the Green Belt as a part of our home. The Wirral is a wonderful place to live and I would ask you to think of the legacy that our children and grandchildren will inherit. Wirral should have modest, sustainable development using brown field sites. Green Belt land MUST be preserved. The Hoylake Golf Resort is a vanity project which should be cancelled immediately. The millions this will cost would be better spent on roads, schools and existing leisure facilities. The infrastructure across the Wirral is to capacity; the roads are busy, the hospitals are operating at 100%, the Doctors are so busy it is so difficult to get an appointment when you need one and the schools are full. The Wirral does not need a mass influx of more people. Protect the Wirral from mass over development. Keep our Green Belt safe for future generations
DOR00031	We are writing to oppose the planning permission on Wirral green belt. We have both lived on the Wirral for 60 plus years. In the leaflet that came to our home you make reference the government want land to build affordable houses. They may be affordable for people living in London but, certainly not the average person living in the Wirral area. In our opinion you'd be far better to regenerate the poor areas that are run down. The government promised to help out with the explosion that happened in New Ferry back in 2016 and then they did a U-turn and didn't help so why should the people of Wirral now allow the government to build on our green and pleasant land. They may be affordable for people living in London but, certainly not the average person living in the Wirral area. In our opinion you'd be far better to regenerate the poor areas that are run down. The government promised to help out with the explosion that happened in New Ferry back in 2016 and then they did a U-turn and didn't help so why should the people of Wirral now allow the government to build on our green and pleasant land. Therefore, we OPPOSE planning on Wirral Green Belt.
DOR00032	My objections are built upon the original intention of Green Belt land to prevent urban sprawl and protect rural communities. 'Any building on Green Belt land can only be approved in very special circumstances and demonstrate that the benefits to the development will outweigh the harm caused to the environment.' As an Eastham resident I feel that it is my duty to fight to retain our beauty and sense of space and ask that you respect the views of the people of Eastham.
DOR00033	Same as DOR00013
DOR00034	In Belvidere Rd Wallasey, a once beautiful 4-BR house, by the playing field has been unoccupied for 2 or 3 years. Why can't houses like these be taken over by the Council either by compulsory purchase or an agreement with the owners i.e. if the owner has gone into care a payment toward their expenses or until the owner has to return home?
DOR00035	I understand that you are required to identify sites for new housing, avoiding greenbelt land wherever possible. Please see the attached swimming baths plan Ordnance Survey maps (Cheshire Sheet 13.1) 1935 and 1960 showing well established swimming baths in the centre, which is Upton Road, Moreton (next to the Boy Scouts HQ). At some point this has been overlooked and the brownfield site has been joined on to the actual greenspace land by Wirral Council. The titles at Land Registry now, attached above as 'tiles plan', show the true greenspace land and the brownfield site historically occupied by the swimming baths separately. [There has been] a 'Pre App' meeting on site with the Council outlying plans to build twelve semi-detached residential dwellings there, accessed from Moreton Rd, with the backing of Magenta Housing [planning application and site layout plan provided]. However, I was told this would be refused based on the current classification of the site as part of the Lot 151 Urban Greenspace accessed off Paulsfield Rd. I believe this is a mis- classification and that my site is actually a brownfield site, accessed from Upton Rd.
DOR00036	I thought I would let you know the feeling of residents in my area on a piece of land that would be suitable for two bedroom bungalows for which there is a great need; with people not occupying a third and possibly four bedroom in the houses they are currently in. The land in question is the recreational area on the corner plot at the end of Warrender Drive; this was originally designated to attract young families with children who would use the swings and slide; but this has fallen by the wayside with the field in question occupied at night by gangs of youths, drinking and drug taking; not to mention people not from the immediate area using it as a dog toilet. All my neighbours agree that the field is not used for what I was intended for, and it should be used to build two bedroom bungalows on it; similar to the bungalows that were built three years ago at the start of Warrender Drive overlooking the area in question. This land that houses the bungalows was a green field and attracted undesirables at night, but they have now moved over to the field opposite. This area in question is not being used for the purpose it was originally intended; and would be better used as part of the green land build that the council have to build on; it would accommodate 12 to 14 two bed bungalows and raise the area to a desired status.

DOR REF	RESPONSE
DOR00037	A recent survey over the British Isles came up with an amazing conclusion about 'built-on' or brown sites across the area. Only (please check it) about 0.13% of the country is covered in built-on land, this to include all cities, factories, houses etc. The surveyors were taken aback at just how little land has been built-upon. With this in mind, it would appear to me that we could build a city the size of Chester every year for a hundred years without using up any more than about 5% of the British Isles; thus leaving 95% green or greenish. The nonsense we are being 'sold' by the media and the self-interested parties that we are an over populated nation with little space left to build upon is poppycock! Modern houses are increasingly, three-storey high, and look a bit Tudorish and pleasant. Why not, using inducements, such as ending rate payments for those involved in the scheme, carry out the following programme: THE SCHEME - If enough householders (mainly under council control, but not exclusively) in a street, accept a third storey building (like a penthouse flat) on top of their own then 'the scheme' could be rolled-out along their road. Many thousands of new dwellings is possible and on the same land base. Many thousands of new dwellings is possible and on the same land base.
DOR00038	I have lived at this address for 21 years, and very much like the view from my landing window overlooking fields. I object to proposals to build on the green belt land and do not want to see houses, and the noise while being built. Leave the green land green alone, not concrete and bricks
DOR00039	I object to proposals to build on the green belt land on the grounds of increased traffic and inadequate parking. The effect of building which has been going on for last 2 years and is accelerating is already causing traffic jams in Heswall and making it harder to find a parking space. In particular there are already jams at the top of Deliver Road caused by parked vehicles and increased traffic. Any building in Pipers Lane will quite simply exacerbate the problem. Please ask the Government to think again and to consider some better planned new towns.
DOR00040	Woodend Cottage Representation. The site is not restricted by any constraints or allocations apart from its Green Belt designation. The proposed site does not contribute to any of the 5 purposes of the green Belt and within the SHLAA assessment the proposed site was considered to be sustainable with close proximity to services and infrastructure. The site would contribute to the Wirral's required housing and will not lead to the significant loss of Green Belt. Furthermore, the physical features that surround the site will ensure that there is no convergence or coalescence of Bebington with any surrounding settlements. In conclusion the site is therefore considered to be sustainable, available and developable within the next 5 years and will therefore assist with Wirral's 5-year housing supply. The site should therefore be released from the Green Belt in the new Local Development Plan and allocated for new housing development. [Vision Statement and reports attached]
DOR00041	All bat species and their roosts are legally protected by domestic and international legislation. This means you will be committing a criminal offence if you don't take this into account during the development option review as the proposed development is likely to disturb a bat group or groups of bats in their roost, damage or destroy the bats roosting place. There are other wild life issues and conservation to think apart from the site being of historical importance and the loss of the area for recreation purposes for the public and our children. You should refer to key legislation regarding to wildlife and countryside ACT (1981) and the conservation of habitats and species regulation (2010). Protecting our heritage and the great outdoors is really important to me. I think your decision to even think to build on this recreation area and place of natural beauty is absolutely outrageous. There are plenty of brownfield sites to build on before considering building on our beautiful green belt and conservation areas.
DOR00042	<p>It is unfortunate that the released papers on the local plan do not seem to include the SHLAA 2018 report which means that citizens cannot interpret or challenge the GB land site scores given in the review documents. This somewhat weakens the public consultation process I suggest. Do you know when it will become available by any chance? It is also strange that for 1984 and other sites the official assessment does not take into account impact of loss of high quality agricultural land, transport capacity and visual and landscape impact. It notes that these would require independent appraisal before [land] release. I wish to object to the release of SP042/042A land and particularly site 1984 (Claremont Farm fields to Lancelyn Farm fields) for housing development. The NPPF requires that Green Belt land will only be released for development under 'very special circumstances outweighing the resulting harm' (para. 145). I will argue, based on the council's own Development Options Review objectives and criteria, that development of this site will create significant harm for residents and the environment.</p> <p>For example, taking several of the NPPF harm types to be avoided:</p> <ul style="list-style-type: none"> • Detrimental impact on the Dibbinsdale SSSI. • Detrimental impact on Protected Sites: core biodiversity areas & tree preservation areas. • Destruction of an area of outstanding natural beauty • Destruction of Heritage Assets: part of the Brunanburh battle site; probable Roman farm; possible early Christian site; possible Neolithic / Bronze Age calendrical site • Flood Risk: site drains into Dibbinsdale SSSI to the south, a biologically sensitive flood risk area. Risk also of grey water/sewage contamination. Please see the enclosed analysis of the impact of housing on this site (1) which is based on your own Development Review objectives, criteria and indicators. On several criteria, housing development will be contrary to council objectives and highly detrimental to local residents. <p>In summary please note the following objectives and decision criteria for Site-Specific sustainability appraisal have been considered here as being particularly relevant to site 1984.</p> <p>Environmental Protection & Enhancement :</p> <ul style="list-style-type: none"> • To maintain and improve Biodiversity and Natural Habitat; to minimise Pollution to Land, Water & Air; to conserve Local Heritage; to reduce the impact of Traffic Intrusion in Residential Areas. <p>Natural Resources:</p> <ul style="list-style-type: none"> • To reduce the impact of Flooding and other natural hazards

DOR REF	RESPONSE
	<p>Social Inclusion:</p> <ul style="list-style-type: none"> • To promote inclusive, healthy communities Sustainable Consumption & Production: • To maximise provision for high quality tourism in pursuing all these 'official' Wirral Council and National GB policy objectives we have shown that housing development on SP042/042A and site 1984 would be highly detrimental. <p>In summary, on key issues of importance :</p> <ol style="list-style-type: none"> 1. Overall nature of the site: it is classed as rural farmland' and 'high quality agricultural land' in recent council local area character studies; it is classed as 'not enclosed' and has a 'durable non-urban boundary' on the council's own definitions. 2. To reduce the impact of traffic intrusion in residential areas: the site is surrounded by traffic and accident 'hot spots' with poor access. 1500 to 3000 additional cars would be a disaster in terms of noise, pollution and danger. There is a high proportion of old people and a poor bus service already. 3. Services: primary schools are oversubscribed already. Surgeries and dentists are very busy. Some dentists have refused NHS patients. Spital station parking is already saturated by commuters. 4. To minimize the impact of flooding: site drains into Dibbinsdale SSSI to the south, an 'official' flood risk area. Site 1984 is very low lying and would require large volumes of surface, grey and sewage water to be pumped uphill 50 ft. Pumping failure would flood Dibbinsdale SSSI with sewage. One assumes a 'sewage farm' draining into Dibbinsdale would not be permitted for the same reasons. 5. To maintain and improve biodiversity and natural habitat: site is adjacent to the Dibbinsdale SSSI. It is bounded on all sides by 'official' core biodiversity zones. There are 4 large areas with tree conservation, preservation orders. It has 'important' hedgerows. It has several landscape types valuable to wild life and is classed as 'environmentally sensitive' by Natural England. 6. To maintain and promote a locally distinctive sense of place: site has a mix of landscape types with access paths, a mature fishing lake and protected woodland. Claremont Farm has a popular farm shop and café and runs well attended rural events. The Wirral Council Landscape Character Study for Clatterbrook & Dibbin Valley (including site 1984) conclusion is 'maintain & enhance'. The site is screened by woods and high ridges and only a few houses are currently visible. It is a dark sky site. 7. To conserve local heritage: the site is at the south end of the nationally important Brunanburh battle site. Pottery scatter, field marks, 19th century OS maps and modern lidar maps show large ground features which could be from several periods known to be present. There may be a Roman farm at Claremont. In day to day, practical terms affecting residents, the loading of car traffic from 1000 - 2000 new houses onto current local roads already congested and with several accident hotspots, is irrational. The location of the site provides no means of mitigating this. Public transport services are already poor in the area and non-drivers are not well served. Added pressure on busy local surgeries, dentists and full primary schools is also unwelcome. <p>There are several other issues of broader concern. The site 1984 land is classed as 'high quality agricultural land' which would be permanently lost under development. The site is classed as 'not enclosed' by urban development on the council's own definition. The durability of the site boundary is classed as 'strong'. Much of the site also has areas of high core biodiversity, tree preservation orders, mature woodland, ponds, lakes, ditches and hedgerows. The site is adjacent to the Dibbinsdale SSSI which would be put at risk. Water contamination is a risk but Wirral Wildlife point to the impact of disturbance from thousands of new houses and residents. The Wirral Landscape Character Assessment recommends maintenance and enhancement of this 'rural farmland' area. It is part of a wild life corridor from Raby Mere and Dibbinsdale SSSI to Storeton. Surely all this must not be lost forever? In practical human terms, site access via footpaths provides people from the local built up suburbs with a 'green lung', exercise, and leisure opportunities and an area of tranquillity which is much valued. There is potential here for nature and history tourism. Of less immediate concern to some local residents perhaps, the area has a rich history stretching back to Pre-Roman times with Neolithic artefacts found nearby. If the Council is serious, on behalf of the community, about 'preserving local heritage' it has to consider the growing direct and contextual archaeological evidence that site 1984 and its immediate surroundings may contain significant remains from several eras from Prehistoric, Romano-British, Saxon and medieval periods. For example the main Roman road from Chester to Meols passes just to the west of site 1984 at Clatterbridge and soil marks in the north of the site hint at a large rectangular enclosure: perhaps a latifundium complex.</p> <p>Reference 2 therefore addresses four issues:</p> <ol style="list-style-type: none"> 1. Are the current government and council housing need forecasts credible since they both rely on the same 'official', open ended methodology and obsolete base data? 2. Taking the most recent 'official' population data but keeping the 'official' methodology what are the future housing needs on Wirral? 3. Taking a more transparent, trends based, method using the latest data what are the housing needs? 4. Allowing for council identified housing places on brown field sites and the above forecasts how much Green Belt land actually needs to be released for development? <p>The government 2017 target for Wirral is 800 houses per annum or 12,000 over fifteen years. The Council sponsored SHMA report of 2016 suggested 835 – 1235 houses per annum. Both are based on old data and old assumptions about population growth, household size, economic growth and migration and housing market conditions. The population data and many assumptions go back to the 2012 SNPP. If we use the Wirral population projections released in May 2018 by the ONS and scale the earlier forecasts appropriately we get a target of ~7,000 houses not 12,000. Population growth rate has declined and will continue to decline post Brexit since all of the supposed growth is due to assumed and clearly optimistic, economic migration into Wirral. Using an up to date trends based analysis suggests a needed build rate of 220 to 350 units per annum or ~4,300 houses in total not 12,000. Taking into account the 91 brown field sites with spaces for 2,400 dwellings now identified</p>

DOR REF	RESPONSE
	<p>by the council, which are supposedly to be developed first, the residual need would be for 1,900 to 4,600 houses from another source, depending on which of the above forecasts was taken. However Peel Holdings have recently declared in the media that they will build 2,700 dwellings at Wirral Waters over fifteen years and up to 6,500 dwellings subject to agreement about support for infrastructure development from local and central government. Taking the post brown field residual need of 4,600 houses we are left at most with a need for 1,900 houses on the Green Belt. However the council proposed release plan covers ~7.6 square miles and ~4,900 acres. At a typical NW region density of 14.6 dwellings per acre this land could support ~71,000 houses. So in reality only 2.7% of the Green Belt land on the release plan would be needed even accepting the updated, overall 7,000 houses target. I have not factored in here the 6,000 empty properties known to be on the Wirral. Overall the proposed release of 4,900 acres of Green Belt land is surely irrational. I submit that if a truly necessary few percent of Green Belt 'plan' land needs to be selected for development it would be doubly perverse and irrational to develop land parcels adjacent to the Dibbinsdale SSSI, namely SP042, SP043, SP044, SP045. Any such release would be challenged on these grounds. We note that the Dibbinsdale SSSI is the only one of the 12 Wirral SSSIs to be directly threatened by the proposed Green Belt land release. Resident could reasonably conclude that 'official' special sites east of the M53 were considered less valuable by the Council than those to the west of it. [Additional information and analysis attached which was circulated to residents]. [Booklet attached which provides independent analysis of the impact of housing development at Poulton Lancelyn].</p> <p>The government 2017 target for Wirral is 800 houses per annum or 12,000 over fifteen years. The Council sponsored SHMA report of 2016 suggested 835–1235 houses per annum. Both are based on old data and old assumptions about population growth, household size, economic growth and migration and housing market conditions. The population data and many assumptions go back to the 2012 SNPP. If we use the Wirral population projections released in May 2018 by the ONS and scale the earlier forecasts appropriately we get a target of ~7,000 houses not 12,000. Population growth rate has declined and will continue to decline post Brexit since all of the supposed growth is due to assumed and clearly optimistic, economic migration into Wirral. Using an up to date trends based analysis suggests a needed build rate of 220 to 350 units per annum or ~4,300 houses in total not 12,000. Taking into account the 91 brown field sites with spaces for 2,400 dwellings now identified by the council, which are supposedly to be developed first, the residual need would be for 1,900 to 4,600 houses from another source, depending on which of the above forecasts was taken. However Peel Holdings have recently declared in the media that they will build 2,700 dwellings at Wirral Waters over fifteen years and up to 6,500 dwellings subject to agreement about support for infrastructure development from local and central government. Taking the post brown field residual need of 4,600 houses we are left at most with a need for 1,900 houses on the Green Belt. However the council proposed release plan covers ~7.6 square miles and ~4,900 acres. At a typical NW region density of 14.6 dwellings per acre this land could support ~71,000 houses. So in reality only 2.7% of the Green Belt land on the release plan would be needed even accepting the updated, overall 7,000 houses target. I have not factored in here the 6,000 empty properties known to be on the Wirral. Overall the proposed release of 4,900 acres of Green Belt land is surely irrational. I submit that if a truly necessary few percent of Green Belt 'plan' land needs to be selected for development it would be doubly perverse and irrational to develop land parcels adjacent to the Dibbinsdale SSSI, namely SP042, SP043, SP044, SP045. Any such release would be challenged on these grounds. We note that the Dibbinsdale SSSI is the only one of the 12 Wirral SSSIs to be directly threatened by the proposed Green Belt land release. Resident could reasonably conclude that 'official' special sites east of the M53 were considered less valuable by the Council than those to the west of it. [Additional information and analysis attached which was circulated to residents]. [Booklet attached which provides independent analysis of the impact of housing development at Poulton Lancelyn]</p>
DOR00043	We don't need new houses in Woodhead St. The car park is needed for local people who do their shopping. Instead of houses, we need the broken down shops and buildings pulled down and replaced with new shops. We have a very poor council here. The whole of New Ferry is covered in weeds and trash.
DOR00044	I am completely opposed to any building on green belt land, and already find Heswall town centre is becoming over crowded with flats. Also just how many coffee shops does a small town need? It is becoming a joke whoever is allowing this to happen. The Council need to look elsewhere.
DOR00045	<p>Peel waters are disingenuous, their PR machine is responding to public criticisms. Peel wants investment/monies from pockets other than theirs before they will build anything. They do not want to spend any of their own funds. WBC has to be open about this.</p> <p>Brownfield sites - Reeds, Moreton land to Typhoo and Premier food cakes, this is not contaminated, the factories are clean and quiet. Why nothing there? Who set viability zones?</p> <p>Burtens pasture road released for brownfield. Why not rear of site.</p> <p>WBC not open about social housing – bamboo farmed from WPH and St Helens taking social housing out of affordable rents and into private rental markets·</p> <p>Focus a removal of land from green belt is on South Wirral and Merseyside of Borough, Heswall/Caldy side preserved – Not Acceptable.</p>
DOR00046	I was surprised about boundaries of areas i.e. that Pensby, Irby Thingwall are lumped as one. A planning application for 34 houses including affordable houses at Townsend Ave was refused and one reason was joining Irby and Pensby. I actually supported development of this untidy unsightly corner especially as it was for affordable house. Please reconsider this site. Also the sites of Nursery Thurstaston Road and the heather lands which would result in at least a total of 50 new homes without touching greenbelt. The heather lands site would be a good for retirement apartments.

DOR REF	RESPONSE
DOR00047	SP019 or SP019B – which one? Documents vary in reference to the two, one is 100.79 has. Over as 44. Review background report Sept 18 on website contradicts itself referring only to SP019 – new information states 27% partially enclosed + if released will affect the separation between Irby and Greasby yet another document states the separation won't be to affected. Misleading to public during consultation period. Agricultural land classification for SP019B is incorrect and out of date. You have used a map pre 1988. SP019 and SP019B should be included in best and most useful agricultural land. I can prove this. I will provide details of crops grown by farmer. Easements re Western link hi voltage cable included in this land. Please send me a copy of the information you hold regarding these easements and restrictive covenants – as discussed. Also please advise of evidence obtained from Natural England for the current post 1988 classification of SP019 and SP019B. Both SP019 and SP019B are areas of Biodiversity with Canadian migrating geese visiting year after year to feed. Natural habitat to bats, pheasants, ducks, hedgehogs, foxes, squirrels, rabbits. Public bridleways and rights of way. Open views - encroachment against our countryside. Consultation period too short and very rushed. You aren't giving people enough time to research information and not giving Peel enough time to provide the evidence for the extra 6000 houses they say they can build. Why is this being rush. Not our fault the Council have left it all too late. 6 Weeks not enough time
DOR00048	Need to challenge National Government figures and rationale, if necessary in court. 1. What population are being catered for? I.e. not affordable social housing. Post Brexit conditions – will green land become more vital? What future plans are in place for agriculture? 2. Wirral is Green belt. Tourism is important. Agriculture and open spaces matter. Sustain and encourage population. Improve health and wellbeing thus reducing other costs e.g. medical. 3. What effect will population have on vital services and what provisions are being made for the future?
DOR00049	I have lived in Barnston area for 55 years and have continued to love and enjoy the open spaces. My concern is that they build on farm land on Barnston road and close surrounding areas and will more likely drive people away. Also I have always understood that surrounding farm land is actually owned by Leverhulme Estates and therefore would not be offered for building land. I would also like to add that any housing proposed in Wirral West would not be affordable to many. Also Heswall is also now over built.
DOR00050	Merseyside Fire and Rescue Service have considered the proposals set out in Wirral Council's public consultation for future development in the area over the next fifteen years, as part of the preparation of its statutory Local Plan. We have noted that the consultation includes a number of proposed land allocations for housing, employment and mixed uses and sites for further investigation in the Green Belt. We have no detailed comments at this time on any of the areas being explored for development but would the Council to consider the needs of the Fire and Rescue Services as these plans progress. In particular we would ask that consideration be given to the location of hydrants, the ease of access for emergency vehicles and the potential impact of increased housing and commercial provision on our community fire prevention and legislative fire protection responsibilities.
DOR00051	Any development of site 1778 would have a major detrimental impact on my personal finances and future plans. I.e. I would have to move not wishing to live in the middle of an estate, and my house would lose in the region of 100K in value as I would no longer have frontline open countryside views. So it is very important to me. If you are revisiting the initial summary commentary please also note it is a biodiverse listed site and has massive council protected oak tree in the middle of the site at least 4 houses worth. Please note site 1778 has an area 3.47 (Ha) not 4.09 (Ha) as recorded in the Summary commentary page 16. This would reduce the numbers of houses forecast from 92 to approx. 78. Could this be corrected in the commentary? The area figures I used were from the councils own figures for site 1778. Note the site does not go the full length of Sandy lane to Thurstaston Road if that helps.
DOR00052	The Wirral greenbelt has been described as its jewel in the crown by the Council Leader and the proposed release of greenbelt has been described as leaving 2/3rds of it untouched for us all to enjoy. 43% of Wirral is built on compared with our neighbour Cheshire West at 10% and the UK as a whole at 6%. It is not the case as is being suggested that we are over-endowed and only being asked to make a small sacrifice. The Wirral greenbelt was tightly drawn to support urban regeneration, being a peninsular we are bounded on three sides and further encroachment threatens to make us a built-up environment. The Wirral is a peninsular with natural boundaries on three sides and no opportunity that adjacent land can be swapped to offset any loss of greenbelt. The current period is referred to as one of consultation, one in which nothing has been set in stone and no changes have been made. But this is far from the truth, in fact as mentioned much anxiety has been generated so much so that some people have already decided to up sticks and sell before their property becomes difficult to sell due to uncertainty or loss of value. Landowners in expectation of reaping windfall profits have changed their approach to their land management and use. Example: SP061 and SP062 are owned by an absentee landowner residing in Germany. His family has owned this land for a hundred years or more. These parcels of land had been farmed by generations of the same tenant farmer's family. As a consequence of the Council's invitation to sell land the owner submitted a response that he could sell within 5 years and terminated the tenant farmer's lease. The current situation is that of a new tenant farmer with a very short lease in anticipation of an early release for building. <ul style="list-style-type: none"> • The consultation process has been severely impaired in that the Council being selected for special treatment due to its failure to develop a Local Plan has led it into rushing through the consultation process (6 weeks only). This has not allowed sufficient time for the public to be appraised, to consider and to respond. • The 2017 consultation on the proposed method for assessing the strategic housing land availability and the Draft Initial Greenbelt review were not made public successfully. • The feedback on the approach to be taken has not been made public. • The important document the SHLAA has not been updated and made public. • No presentation and consultation meeting were arranged for Councillors, Planners and public to attending Heswall. Heswall would be very substantially affected if SP061 and SP062 are selected for

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	<p>development but many in Heswall remain unaware.</p> <ul style="list-style-type: none"> • The major investor Peel Group has been highly critical of the leader of the Council and has written in September asking him to desist from misleading the public with a campaign of misinformation • The Council has said that it will employ a statistician to review the estimated building requirement. There has been no information made public about any new figures and so these are therefore not available for public scrutiny. • Without exception Council members claim to be against building on the greenbelt! It's all down to the Central Government! • The net effect of the difficulties experienced by the Council and the Planners has been to hamper discussion and resolution. If after this consultation the Council is still set on releasing greenbelt land then in fairness to the public they should produce a revised draft proposal using updated figures and set up a new consultation. <p>Commentators are agreed that there is no need to re-designate ANY Wirral Green Belt land for development purposes. It has been the use of incorrect data and methodology that have caused the identified shortfall in the housing pipeline. The total dwelling stock in Wirral is 142,000, with over 84% designated as privately owned and 72% owner occupied and 12% privately rented, Wirral rents are amongst the most affordable in the country. The estimated requirement of 12,000 houses over 15 years equates to an 8.5% increase which is unsustainable. Peel have committed to build in Wirral Waters between 2,800 (not 2400) and 6450 up to 2035 depending on change in the area, investment and stakeholder commitment. The Council has only allowed for 1100 houses before 2035 saying that they needed a level of certainty about projections. The Appeal Court Lord Justice Lindblorn ruled that to be considered a development need only be possible, not definitely deliverable. Peel has recently written to the MP Margaret Greenwood promising over 1000 homes in the next three years. At the very least these 1000 homes should be allocated to the first period to 2025 and Peel has said that this was only the start of their delivery. The Council should then make provision for a further 5450 homes at Wirral Waters between 2025 and 2035. This would exceed any shortfall and negate the need for Greenbelt development. The Council has misinterpreted the NPPF2 requirement arising from previous under-delivery. This requires a buffer to be "moved forward from later in the Plan period". It does not increase the total number of dwellings to be provided merely their timing. Furthermore the number brought forward should be no more than 20% of the first 5 years not 20% of the full fifteen requirement. The Governments original target to build 250,000 new homes each year were based on projection of growth in households of 210,000 per annum.</p> <p>The ONS revised figures are that households are rising only at an annual rate of 159,000 about the rate of recent housebuilding. The original estimate of the shortfall in housing for Wirral have been called seriously into question and the leader of the Council has requested that the Housing Minister accepts a downward revision of a housebuilding requirement down from 803 to 500 over 15 years. Even so there is a definite need for even further correction: • By the calculations of Professor (retired) [another respondent] the latest ONS household projections for Wirral suggest a basic 220-350 houses per annum requirement or 4,300 over 15 years. Even this assumes a net inward migration into Wirral over the plan period for which there is no supporting evidential material, in fact given Brexit even the most optimistic would say that was very unlikely. Add in 2400 brownfield sites identified by the Council, a 2,900-minimum offer from Peel, 3570 over 5 years and a total of 8870 non-greenbelt houses. This compares with the new ONS low economic migration scenario of 4,500. Only a fraction of the available non-Green Belt Housing potential is needed. Scaling up by a small "affordability uplift" factor makes no difference. The certain bottom line is: no Wirral Greenbelt land need be released at all. • If you are not convinced then by the more conservative calculation of a former director of planning representing the Heswall Society - the latest ONS based projections just published and, using the Government Standard Method, recalculates the minimum number of dwellings required to the significantly reduced figure of 7320 over 15 years (488 per year). He then points out that the July Cabinet report estimates a supply of 8735 new dwellings (7635 new dwellings in Wirral and a provision of 1100 for Wirral Waters) over the Plan period. Using the demand figure of 7320 from above, this would make a surplus of 1415. In addition to the above there are a massive 6,000 empty properties; based on historic performance the council has underestimated the number of empty sites to become available at only 60 per annum. In the year 2016/7 290 properties were brought back into use. If this were assigned some priority and the current low number of staff increased then an improvement to 350 would not be unreasonable. 16000 brownfield sites have already granted planning permission and a large number of housing permissions have already been granted but are not being developed. Cheshire West to the immediate south has significant housebuilding projects right against the boundary of Wirral and these need to be considered in respect of the overall housing need for Wirral. Nearly eight square miles, 4900 acres are being considered for release. This could accommodate 71,000 houses at normal densities against the initial requirement for 12000 houses over 15 years. But as we have seen in 3.1 there is no requirement to release green belt most of which is high quality agricultural land. Post Brexit we will need this land. The new Agricultural bill stresses the importance of producing our own high-quality food. Agricultural land increases in value from £21,000 per hectare to £1.95 million on average when councils allow it to be used for new homes, according to government figures. The inability to take proper account of Wirral Waters in the statutory register of brownfield sites is threatening the Green Belt with development in order to meet housing needs that could be met by regeneration of derelict areas.</p> <p>This needs to be tackled such that these brownfield sites are included. There is more than ample brownfield land available. To not to develop these sites because of low density or cost performance for builders is to leave them as blights on the landscape. To overcome this the Council should seek to assist small/ medium sized builders with developments on this land. It is the very areas that have these brownfield sites where affordable housing is most needed, where nearby jobs are available and transport infrastructure is already present.</p> <p>A key aim of Greenbelt legislation is that of urban regeneration. Areas in Birkenhead, Wallasey and New Ferry to name just a few are in desperate need of development it is not therefore appropriate to set aside this crying need and respond to the developers who are actively targeting only greenfield sites. We have been urged by our Council Leader to think outside the box.</p>

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	<p>Here are a couple of suggestions relating to Council owned land which may or may not have some value, there will of course be many more which won't come to light because of the headlong rush of the consultation process:</p> <ul style="list-style-type: none"> - An area of land south of Whitfield Road, West of Milner Road, east of Downham Road South, north of Forest Road. This is overgrown with gorse to such an extent that it is virtually impassable in most places. Also, there are two derelict tennis courts. This is an ideal location for new housing and for refurbishing any leisure facilities. - An area of green space bounded by Kestrel Road, Edgehill Road and Town Meadow Lane in Moreton. This is a very extensive green space used for park and playing field. Of course, sufficient playing field space and parks will need to be preserved but there remains an opportunity for a significant number of affordable housing without spoiling the amenities currently enjoyed. <p>Wirral's population was 340,500 in 1981 (APS), nearly 20,000 higher than in 2014, and 18,300 higher than the estimate for 2016. The population was much higher in the past but with a smaller stock than when Green Belt boundaries were fixed in a previous UDP/Local Plan of 1983.</p> <p>There is no current or projected requirement in Wirral for new house building on any large scale. Examination of the Council's own statistics shows the population to have declined since 2008 but with a slow increase in the last few years. The population is around 320,000. Projections are for a very limited population growth but this is in the 65 year plus age group and a small decline is expected in the younger set. Net inward migration was forecast (2013) to be very low and given Brexit can be assumed now to be negative. The demand for housing is of course very different by area. Throughout the country there are some with severe housing shortages and some with an excess. Savill's have identified Blackpool with the greatest percentage fall in housing need of any UK city, with an average age of 43.2, a low level of migration and younger people leaving in large numbers. ONS latest housing need estimate is minus 54. Wirral average age is 42 and it outdoes Blackpool in terms of having a very low immigrant population. It is clear that the demand for housing is very low and possibly negative. The number of people in Wirral who are economically active is relatively stable and these must form the main part of the target for new housing but it would appear that these are already in the main adequately housed and not seeking new housing.</p> <p>The economic outlook for Wirral is not promising. Wirral has a backdrop of closures and companies moving out and many new developments appear to be on hold and require housing. Some 40% of workers living in Wirral work outside the borough. Creation of new jobs in the borough can be expected to lead to a reduction in this figure as people opted to work closer to home. In these circumstances there would not be a direct correlation to any requirement for an increase in home building. If new housing were to be made available the question then arises would people move to the Wirral? People will only move where there are jobs and facilities. Wirral is not able to offer large number of well-paid jobs nor are its facilities and infrastructure able to accommodate a large increase in population. There is no evidence of any surplus demand for property in this area. There are currently 3,000 properties for sale in Wirral. There is a guaranteed continuous further supply of houses of every sort given mortality rates and transfers to care facilities given the demographic of this area which is predominantly over 65. The development Director of Wirral Waters wrote to the lead Councillor in his letter of Sept 10th "With the support and co-operation of you, and the Council you lead, we could build up to 6,450 in the next 15 years to reach our ultimate goal of 13,000 homes." He also promised Wirral Water delivering 500 units and in the pipeline 1000 new homes by 2022.</p> <p>Land Parcels SP061 and SP062</p> <p><u>Services - SP061 and SP062.</u> In the Wirral these services are already perilously stretched - Hospitals, Doctors, Dentists, Ambulances, Police, Schools, Library, Social Services, Car Parks, Roads. Any significant new housing development would be poorly served and would detract even more from the current situation.</p> <p><u>Accessibility – SP061 and SP062.</u> This parcel of land does not offer any suitable access points at the Downham Road North side or from Whitfield and Milner Road. Conceivably access from Barnston Road could be achieved but it is currently a 40 mile an hour road and an access points to a large estate would result in traffic delays.</p> <p><u>Merging not separation – SP061 and SP062.</u> The Council has adopted the methodology to assess SPs against this purpose of considering whether the development of a green belt site would join up "Core Strategy Settlement Areas". This approach takes no account of local geography and is based on an arbitrary decision made some years ago which was not intended for this particular set of deliberations.</p> <p>It is the case that Pensby, Thingwall, Irby, Heswall and Barnston are distinct and separate locales. To suggest otherwise is what we might have expected "Government Inspectors with no knowledge of the area" to have come up with.</p> <p>The document accompanying the establishment of the Merseyside Green Belt specifically refers to the separation of individual towns and villages rather than large "Core settlement areas". It states that the Green Belt is necessary to "check the outward spread of the built-up area" – not simply to avoid joining up "Core Settlement areas".</p> <p>The land parcels of SP061 and SP062 serve to prevent the merging of Pensby, Thingwall, Heswall and Barnston. The Council recognises this in Appendix 6 "Green Belt Parcels Initial Separation Commentary" it states:- "would remove the physical separation between Pensby and Heswall(SA7) and the rural village of Barnston, which could affect the character, appearance and distinctiveness of Barnston village. However, the Council then assesses SP062 in Appendix 3 as not serving purpose 2 and acting as preventing the merging of neighbouring towns. This is an error which needs to be corrected.</p> <p><u>Biodiversity – SP062</u> The parcel SP062 is classified as an LCR Core Biodiversity area and this should be taken into account when considering development when there are available sites which are not so classified. We live right on the edge of SP062 and can personally testify to the abundant wildlife. There are nearby large old oaks and the field separation of hedges provides plenty of natural</p>

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	<p>habitats. Greenbelt land contributes to reducing global warming and house building has the opposite effect</p> <p><u>Farmland – SP062.</u> The land parcel SP062 is noted in Appendix 7 as high-quality agricultural land (class 2) and has recently been used for the Old English rare breeds, latterly beans and currently wheat. Guidance states that “where significant development of agricultural land is demonstrated to be necessary, councils should seek to use areas of poorer quality land in preference to that of higher quality.” Of the sites recommended for further investigation 17 strategic parcels are not classified as Best and most versatile agricultural land” With the unknown of Brexit, loss of farmland is surely unsustainable (NPPF).</p> <p><u>Public Rights of Way - SP062.</u> There are 3 public rights of way within SP062 – one of the highest numbers of footpaths on a single SP site. The National Policy Framework July 2018 states “In respect of greenbelt construction a local planning authority should regard the construction of new buildings as inappropriate in the Greenbelt.” (With only a few very limited exceptions). Inappropriate development is by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.” The report by Lichfield and Partners of May 2016 to Wirral Council which gave rise to the requirement figures the Council have been using is clearly out of date and using unreliable future scenarios. It is worth asking how the Council came to be so badly misled which in turn lead them to determine a need to threaten the Wirral Green Belt. It is of course the case that other local authorities have given planning permission for large scale builds on their Green Belt perhaps the nearest to us being Sefton. However, the case for a pressing need outweighing other objections has clearly not been made for Wirral as the Minister for Housing pointed out when admonishing our Council for not producing a timely development Plan “this is not an area of pressing housing need”.</p> <p>By allowing developers to cherry pick the most profitable sites for them the necessity to direct investment to the run down and a neglected part of the Borough is not achieved. Wirral should concentrate its efforts on proactively regenerating the run-down areas of Birkenhead and Wallasey and improving the life chances of the population there, but should for now preserve its beautiful greenbelt It is of some concern as to how the Council will assess and report the response to this consultation as it has not specified any particular layout. The greenbelt parcels of SP061, SP062, SP063, and SP064 & SP065 required to meet the target of 1800 homes would merge the villages of Pensby, Irby and Barnston with Heswall and would represent a huge change in the nature of the villages and the services and infrastructure required. This merging of villages goes against the exceptional requirement and standard for building on greenbelt land.</p> <p>I am particularly concerned with the suggestion that either of these areas might be used to solve the suggested housing requirement by building two huge estates. The enormous problem of managing such very large building developments and the inevitable disruption as well as the required upgrading of the services of Doctors, Dentists, Schools, Libraries, Community services, Hospital, Police, Ambulance and other services as well as the infrastructure of roads and services will surely render the surrounds undesirable for many years. In the meantime they will be blighted with the uncertainty that comes from sustained long term impending developments. People who come to live in the Wirral do so because of its green spaces and will not be attracted to large estates or areas with huge developments potentially upcoming.</p> <p>If a new garden village does need to be constructed I suggest that the Council might consider that it should be on a brownfield site and that a prime candidate would be Wirral Waters. Peel Holdings might be more amenable to making timely progress if the Government funding referred to could be secured conditionally to help them with a timely staged development. This would be easier to manage and control and would be less disturbing for existing residents and would preserve the greenbelt and the character of individual Wirral villages.</p>
DOR00053	<p>We would like to propose an additional potential infill site not identified in the “Potential Infill in Villages in the Green Belt” document (appendix 16). We would like to obtain planning permission for a section of land adjacent to Telegraph road, opposite Caldby Rugby Club playing fields. We believe that development of this land would not impact upon the openness of the Green Belt (being adjacent to the road, and in the building line with existing houses). Nor would this development cause any harm to the openness of the Green Belt.</p>
DOR00054	<p>Before building on (No Suggestions) village carpark, why not use the peel holdings site, 13,500 houses could be built on there, also Livingstone Street were my mum used to live for 48 years that the council compulsory purchased over ten years ago, that land for 400 houses has been waiting for over ten years.</p>

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DOR00055	<p>That you were not aware of the covenant which the site was subject to and that you had not investigated the dangerous access to/from Grange Old Road to the main highway particularly Blackhorse Hill (a notorious accident black spot) and the A540 when designating in 2000 the site for residential development. Your assertion that you followed a prolonged statutory process when so designating the site is also deceitful because the fact is you failed to consult with local residents including ourselves and others of Grange Old Road. Your assertion that the existence of a covenant did not prevent the site from being zoned for housing development is also an obvious attempt to excuse your failure to take account of a covenant which restricted in perpetuity housing development on the site. What you term "further highway capacity work" should have been undertaken in or before 2000 when it would have identified the site was entirely unsuitable on the grounds of lack of highway (and footpath capacity alone for housing development. You also failed to take account that the site was and is subject to a right of way in order to facilitate access to the War Memorial including on Remembrance Sunday and that the Fire Service use and require the site to access Grange Hill to extinguish fires on the Hill. Your zoning of the site shows disrespect for the War Memorial, which overlooks the site in question, and all those local people who gave their lives in the service of the country. You also failed to take account that the whole site as originally covenanted was and is designated as of biological, geological and ecological importance and an archaeological site and designated greenspace. Your assertion that the "site" is only adjacent to Grange Hill which is so designated and therefore not so designated is again an attempt to excuse your failures - the Council's comments on Applications APP/15/01105 and APP/17/01546 relating to the Mushroom Farm which is part of the covenanted site are evidence of such an attempt by you. Your failures as recited above have resulted in the owner - we are advised the daughter (who we are also advised resides in Spain) of the couple who live in Grange Hill - taking advantage of them by offering to pay the Council £200,000 to lift the covenant to permit her to indulge in property development for her and the developer's personal gain but which would be detrimental to the public interest and safety. The owner's offer to pay such or any amount to the Council to lift the covenant can be described as an "inducement" to the Council, its Councillors and its officers which is referable to the Council's "Standards and Constitutional Oversight Committee", the Information Commissioner, the Local Government Ombudsman and the District Auditor. You can avoid this and all the adverse publicity that goes with it if you withdraw the proposal to designate the site for housing purposes.</p> <p>The Council misrepresents, in its schedule of "Proposed Housing Allocations", the site shown on the Plans as "land at grange hill farm". In fact the site is a house named Grange Hill, a bungalow and garage/workshop and gardens and is not farmland as the Council misrepresents it to be. One of the other residents of Grange Old Road (who along with other residents the Council chose not to send its letter to) has, on becoming aware of the Council's plans, very recently discovered a report of the Council on the internet which includes the following: "2.3 The Council has recently been approached by the owner (of the said land) who wishes to develop the land for residential purposes which would involve the demolition of the house on the site. An offer has been made on an unconditional basis for the release of the Council's covenant and negotiations are ongoing in this respect". It should be noted that the Council failed to consult with the public or publicise any information with regards to the lifting of the covenant on the green space which includes the site in question. The site has been designated as Urban Greenspace, a site of Local Geological, Archaeological and of Biological Importance including to protect the Bats which are resident in the Greenspace. The intention of the Council when covenanting the area was such that any reasonable person would understand [Reference is made to case law] that it would be available, in perpetuity, as Greenspace for the good of the public at large and to protect it from any building development. Further the only vehicular access to the site is from Grange Old Road a narrow Road with a footpath only partly on one side. The road is frequented by many pedestrians including its residents, children walking to and from local schools and those attending the Sea Cadets who rent their property from the Council, local residents including many walking dogs, the wider public including members of the Ramblers Association and the Friends of Grange Hill. The only access to and exit from Grange Old Road is from and to the A540 and from and to the top of Black Horse Hill a notorious accident spot. Further the Prime Minister and the leader of Wirral Council have vowed to protect Green spaces such as the site in question which is overlooked by the Memorial. [Expresses concerns about access to information] [Concerned about the lifting of the covenant permitting development on the site and affecting the right of access] Such negotiations, if successful, would be to the considerable detriment of the residents, including older persons and children, of Grange Old Road and the wider public's good health and enjoyment of Greenspace including Grange Hill which the Friends work hard to preserve and a defacement of the War Memorial. It would also result in vehicles from 18 properties accessing and exiting onto Grange Old Road itself a narrow road which would result in considerable dangers to both pedestrians and other vehicles and their occupants on Grange Old Road which exits onto the very busy A540 and on the already dangerous top of Black Horse Hill. The Council's proposal that the site shown on its plans SHLAA 0916 and SHLAA 3009 be included in its Local Plan for Housing Allocation is, for the various reasons recited above, opportunistic (in seeking to use the Government's directive to justify it), contrary to the leader of the Council and the Prime Minister's undertaking to protect Greenspace, unethical and detrimental to the public interest. The Council should immediately discontinue its proposal and publicize its undertaking to do so prior to its consultation meetings in West Kirby on the 18th September. Should the Council refuse to do so we will publicize and report the Council's secretive conduct and its refusal to disclose, as it was obliged to in the public interest information, under the EIR's to the Information Commissioner. We will also report the Council's unethical and devious conduct to the Local Government Ombudsman and to the Police for them to investigate whether any of the Council officers or Councillors has committed any criminal act/s relating to the lifting of the covenant.</p> <p><u>Proposed Building of 18 properties on Greenspace land on Grange Hill, West Kirby.</u> The proposal described above significantly harms the character and appearance of the area and should be rejected for this reason and the many other reasons recited in our submission of 11 September 2018 and the following:</p> <ol style="list-style-type: none"> 1. The land in question was subject to a restrictive Covenant and a restrictive Right of Way when it was included by the Council in its Unitary Development Plan of 2000. The Council confirmed at the public meeting that only land which was available could be proposed for development and the Council were negligent in so proposing in its Unitary Development Plan of 2000 the land for development.

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	<p>2. The restrictive Covenant and the restrictive Right of Way (to give the public access to the War Memorial on Grange Hill and the Fire Service vehicular access to Grange Hill) are contained in the Conveyance dated "Twentieth day of October 1982" between the Council and the Purchaser of the land in question. The Covenant expressly restricts in perpetuity the land in question being used for residential or any development. The Conveyance also expressly prescribes there is a "right of way" across the land in question and that "the right of way" is to be maintained in perpetuity.</p> <p>3. The recommendation that the Covenant be lifted showed a total disregard for its purpose which was to prevent in perpetuity the land being used for residential or any development. We have set out various reasons in our initial submission why it would be entirely inappropriate for the Council to grant such permission. These reasons include:</p> <ul style="list-style-type: none"> • that it would significantly harm the character and appearance of the area and be against the public interest to do so; • because it would create significant dangers to the many pedestrians (which include schoolchildren, sea cadets, walkers and ramblers) on Grange Old Road a narrow road with a part footpath only on one side with the line of sight obstructed by a 90% bed at the midpoint of what is a short road; • because there are dangerous junctions on the rural Grange Old Road with the A540 and the top of Blackhorse Hill (a notorious accident spot); • because the land in question is greenspace and part of or immediately adjacent to a site of biological, ecological and archaeological importance; • because building further properties on the land (which is overlooked by the War Memorial) would be disrespectful to the many local people who have died in the service of their country. The residents of Grange Old Road confirm their strong objections, for the reasons given, to the inclusion of the land in question in the: Council's Local Plan for Housing Development.
DOR00056	<p>I write to object to the proposal to build on the above land. This area of unspoilt countryside separates Heswall from Barnston. It contains many ancient trees and hedgerows which supports wildlife and is essential to a healthy environment. I understand that 1800 dwellings are proposed. If this development went ahead it would mean more vehicles on our already saturated road system, more pressure on health services, car parking, school places, waste management, street cleaning etc. and an increase in air pollution. The figure of 1800 may only be a 'start' figure and may be negotiated down so that the Council can be seen to be reasonable by reducing it to say 500. But any reduced figure would alter the whole character of the area however 'sensitive' the design. Traffic problems are getting worse without any increase in the current population. Heswall Centre and Thingwall round-a-bout become gridlocked at certain times of the day, a situation that will get worse.</p>
DOR00057	<p>1. The statistical analysis that led to the Council's figure for the number of new dwellings required over the 15-year period has been shown by a number of studies to be seriously in error and must be reassessed.</p> <p>2. The plan has underestimated the number of dwellings that will be provided by brownfield development. This opinion is justified by the statement made by Peel Holdings on 28.09.18.</p> <p>3. The green belt sites with which I am most familiar, namely SP061 (North of Gill's Lane), SP062 (West of Barnston Village, and SP064E (North of Whitehouse Lane), are not suitable for housing development. • The roads serving the surrounding communities are already barely able to cope with traffic needs, as demonstrated by rush-hour delays on Barnston Road, Storeton Lane, Gills Lane and Whitehouse Lane. • Articulated vehicles are prohibited on Barnston Road (except for access) for a very reason. Furthermore, this road is signed as an Accident Alert Route. • SP061 and SP062 provide a swathe of productive farmland that enhances the character of the Wirral. These sites provide buffers against urban sprawl, which already blights much of the northern half of the peninsular. Loss of the large green space SP062, in particular, would totally merge Heswall, Pensby and Barnston, to the detriment of people who now reside there. 4. More generally, residents rely on Wirral Council to protect, and where possible enhance, our environment. It seems from the Local Plan that this key function has not been given due weight. The great value of the green belt framework in the UK has stood the test of time and must not be set aside unless the circumstances are exceptional. The fraction of the area of the borough already developed in large and we owe it to future generations to retain all our green belt sites into the foreseeable future.</p>
DOR00058	<p>I wish to add my complaint about Wirral Council's plans to destroy up to 50% of our green belt and ruin Wirral's unique character that makes Wirral special. Why the council so ready to give up our unique green spaces, without using up the available empty properties, the brown field sites and all the land that builders and developers own with building and planning permission? In the long term, building all these extra houses will remove much of the green spaces around our housing area and put more pressure on schools, doctors and hospitals, because of the increased population. Our green spaces and parks are the lungs of our nation and as such they are crucial to the health and wellbeing of all of us. We are constantly being told to protect and preserve our green spaces, to encourage the wild life to flourish. We have already witnessed the decline of many of our native species of birds, frogs, mice and hedgehogs, the list is endless. How can we teach the children the value of all this, when there won't be any left after the Council has given permission to build over our precious green belt. This I feel would be a tragedy for the future of Wirral, because once these green spaces are gone, they are gone!</p>
DOR00059	<p>I strongly oppose building new houses on Wirral's already 'shrinking' Green Belt. Hopefully profits for the building companies will not be the priority on the Wirral. Not enough people have an understanding about plants and local wildlife. It is much more complex than most people realise. One small patch of rough ground can sustain a surprising diversity of plants and creatures. Hopefully the local council and all those with influence can work hard to keep this balance between local needs and the beauty of our countryside.</p>

DOR REF	RESPONSE
DOR00060	We as a community within the area of Pensby Village object to the proposed development of the playing fields at the rear of the Children's Centre on Fishers lane. The fact that we are a village and not a town should be acknowledged and respected by the government and we should be allowed to stay as we are. A Village. Whilst we understand the need for 13,000 affordable houses have to be built within the Wirral area by 2035, why is it necessary to build in our village therefore creating more traffic on Fishers Lane which is busy enough as it is now. As Pensby Boys School is now closed cannot half or all of the playing fields there be used, if you are insistent on developing here? This is the second time that we have voiced our objection to this proposal and would appreciate if this matter could be shelved permanently. Surely it is not necessary to build on these fields. A better proposal would be to allow the existing community to use the fields for its children. Peel Holdings should be forced to develop and build in Birkenhead, not other builders in West Wirral (yet again the loser). Is Birkenhead earmarked as "Fracking" lands on Peels lands?
DOR00061	SP043 With Brotherton Park and the steeply sloping Dibbinsdale nature Reserve to be protected, that only leaves Rose Cottage, perched above the frequently flooded junction of the Clatter and Dibbin streams, and the popular local vineyard Farm and shop, with its high-grade arable soil producing excellent local affordable vegetables and its historic cruck barn and recently restored antique farmhouse. The public footpath from Poulton to Bromborough Rake Station and the surrounding park area are a much needed and enjoyed amenity for the local population. Building on it would leave no division between Bebington and Bromborough. Aside from the practical difficulties of building on it at all, I would have thought green belt status was mandatory on every possible count. SP044 This field of some 80 acres is likewise hardly suitable for any kind of housing. If you protect Poulton Hall, Dibbinsdale SSSI and Raby Mere Woodland, that leaves an essentially inaccessible area, which is exactly why the original fortifications were sited here, as protection from Viking marauders disembarking their long ships at the pool. Poulton Hall Road drops steeply down to the bridge over the Clatter and Poulton Road slopes down steeply down the Poulton Bridge over the Dibbin. It is however valuable wildlife habitat, having two of the few remaining Cheshire marl ponds and two long areas of woodland, which managed, with considerable difficulty of access, by the Cheshire Wildlife Trust Wirral Volunteers. It borders the parkland of Poulton Hall with its 400 metres of nine species hedgerow (one for each hundred years the site has been occupied by the Lancelyn Family) and is grazed by the Raby hall Farm herd of organic cattle. SP042 You didn't ask me to comment on this. You say you wish to protect Thornton Wood and Foxes Wood, which are managed voluntarily by the Cheshire Wildlife Trust for the Poulton Hall Estate, but I would like to point that there is also the Wirral rugby club, a thriving local community enterprise which attracts and hosts a great many events throughout the year. I know you recognise the costs involved in maintaining local amenities, having just declined the further tenancy of Marfords Woods (for which you won a Countryside Award in 1986). It would be difficult to persuade volunteers to maintain the two wildlife reserves if their adjacent fields were built on, and impossible for the rugby players and cricketers, campers and cyclists, if they lost their fields.
DOR00062	I wish to strongly register my sincere objections to the proposed Green Belt alterations to land in and around Eastham Village. SP050, SP051, SP052, SP053, SP054, SP055. Village should be left to remain as they have evolved over many years. Villages want trees not acres of concrete and bricks.
DOR00063	I would like to register my formal objection, and that of our local preservation societies including Wirral Archaeology, Cheshire Wildlife Wirral Volunteers, CPRE, and Historic Houses, to the potential loss of Green Belt status of the three above areas which form the environs of Poulton Hall, and include the remains of the Norman (or pre-Norman?) Castle and the probable site of the ancient battle of Brunanburh. Recent and ongoing research by Wirral Archaeology has produced considerable evidence that this area is indeed the ancient battle site, and it is expected to be listed shortly by Historic England as such. The Hall is a member of Historic Houses and is open for tours, while the gardens are open to the public several times a year, all in aid of charities, and the presumed battle site area which falls within SP043 and SP044 is one of the best sites in the Northwest of England for longbow archery owing to the lie of the land and its preservation since ancient times. Additionally, all five of the Government's declared reasons for retaining Green Belt are applicable. Paragraph 79 of the Government guidance states that the essential characteristics of Green Belts are their openness and their permanence. Permanence is paramount! Current estimates show there is sufficient brownfield land for the current and medium term future requirements. Finally the three sites are all on the Council's own map as BMV (best quality) farmland. Much planning is very short term, but as populations increase, food storages will become inevitable, and best quality farmland should not be taken out of production, or we shall have serious food shortages. All three areas are BMV and in particular a full soil survey was recently undertaken for the whole of Site SP43 (Vineyard Farm) to establish this and update the one undertaken some 20 years ago. The supporting documentation will be supplied by the "Save Vineyard Farm" campaign. I therefore ask the Council to respect the Government's Fundamental Aims as set out in the above clauses, and retain Green Belt protection for these areas in particular, plus any others which are prime agricultural land.
DOR00064	May any future building on this be restricted to Bungalows in keeping with the existing estate.
DOR00065	I write to register my objection to the proposed infill village here in Barnston. It would mean increased traffic on an already busy road and the rural nature of our village destroyed. This is also true of some many other parts of our lovely Wirral. Once it has gone it can't be replaced and all that would remain is a housing sprawl.
DOR00066	I wish to express my concern over the proposal changes to Bromborough Civil Hall and Library. I use the civic hall five times every week. I am 80 years old and look forward to using the library. It is also the hub of the village. I wish to express my concern over the proposal changes to Allport Lane Car Park. If we lose the car park the shops in the village will not survive. All the other businesses will also suffer. The car park is full every day except Sunday.
DOR00067	I have recently been informed by Eastham Village Preservation Association that the Council is proposing developments to Green Belt land in and around Eastham Village. As a local resident of Eastham I was shocked and dismayed to hear of this and should be pleased to add my voice to any objections to the proposals.

DOR REF	RESPONSE
DOR00068	<p>Suggested additional parcel of lands which may be suitable for housing development.</p> <ol style="list-style-type: none"> 1. Edgehill Road Moreton – a large grassed area adjacent to Lingham Park football pitches. Ideal for bungalows. 2. Burden Road at its junction with Bermuda Road Moreton 3. Curlew Way Moreton – there are two potential sites in this area. a. A large grassed area between Lingham home, the railway and Curlew Way Flats. b. Opposite the above, is an area which was previously an area used for children’s swings etc. This area is between Curlew Way and Westdale Drive. <p>All of the above are adjacent to bus routes which makes them ideal for development for the ageing population for access to shops etc.</p>
DOR00069	<p>The Council’s proposal to consider utilising part of the green belt within the Local Plan would seem unnecessary in view of the latest estimate reducing the future number of dwellings required. It is understandable that the Council would propose development in these areas as they would guarantee a higher council tax and a certainty of payment. The Council is obviously not expecting developers to provide affordable houses for first time buyers in these locations. Any addition development adjacent to the Wirral Way needs to be avoided as this would further ruin the outlook for users of this major asset. Not only locals but the many from the rest of the Wirral and also Merseyside. It has to be assumed that the Council has given full cognisance of all the additional services, parking, and traffic overload on minor roads and access problems that will occur. With considerable past experience with a major national contractor, I would be surprised that a number of the areas listed, such as the strip to the east of Pipers Lane between existing houses and the Wirral Way, could be deemed developable without some demolition in the area. On the final environmental point it is well within the council’s ability to avoid any development within the green belt as no more of it is being made. Once it is lost – it is lost!</p>
DOR00070	<p>I am writing with regard to the building of new houses on the land beside Pensby children’s centre. My parents live at Copeland Close which backs onto the site. Having discussed this, we would like to say that there are few arguments against the need for more low cost housing but there are real concerns about the current plan. The bungalows in Copeland Close will be overlooked by houses in the new development. All privacy in the gardens and the bedrooms will be gone. This is not acceptable. Would it be possible to reconfigure the plans so that bungalows backed on to the bungalows of Copeland Close? That would be far less obtrusive option for current residents. I hope that you will consider this as current plans are causing a great deal of upset and distress for my elderly parents and their neighbours.</p>
DOR00071	<p>The above 12 acre field should not be included in your local plan. The subsoil in this field is contaminated with industrial waste from Cammel Laird Shipyard. This contains asbestos and other toxic material unknown. This field was used as infill site by “Wimpey” 40 years ago i.e. early 70s. The soil should not be disturbed below ploughing depth. Apart from this, access to this site is from Barnston Road, a designated accident black spot. This leads to the dangerous bottleneck in Barnston Dale and Storeton Lane.</p>
DOR00072	<p>What is going to happen to our beautiful village and surrounding areas. We bought our home here because we loved it as all the people have done. I’m sure the people who are planning all this destruction did themselves when buying their homes. I have never heard a mention of Thornton Hough, Willaston having this problem on their doorstep. If homes are needed why can’t new towns be built as has been done in the past around the Country homes for the future which I know we need. I live overlooking Torr Park where will the children play and get exercise. Don’t take that away from them. At the moment the conkers are falling from the trees don’t take that pleasure away from our children. I could go on forever about the reasons why we must not have this change to our beautiful village. Please make it stay the same.</p>
DOR00073	<p>Wirral used to be part of Cheshire and 43% of it is built on compared to 10% in Cheshire and only 6% in the UK as a whole. It appears to be a suburb of Cheshire instead of a unique peninsula. Wirral is not an area of high housing pressure as the population is going down, due in part to the youngsters going off to college and not returning. Fewer homes need to be built as shown by figures released by the office for National Statistics. [Newspaper cutting attached setting out revised estimates by the Office for National Statistics suggesting a reduction in the formation of new households]. I believe there are 3000 empty houses on the Wirral. There is an elderly population here which will downsize and end up in sheltered, residential and nursing accommodation over the next few years.</p>
DOR00074	<p>I am writing in protest of the plans to build on green belt lands in Eastham. One of the roads cannot cope with more traffic and the roads are chaotic as they area. We need to protect all green belt lands. We do not want any more houses or industrial estates built on green built lands causing more chaos on the roads. The Wirral Council has already destroyed Birkenhead, New Ferry and other areas of the Wirral. Enough is enough</p>
DOR00075	<p>I am writing to regarding the proposals to build under site references SHLAA2024 and SHLAA2025, in Bromborough Village. I have operated a shop in Bromborough Village since 2008. I currently employ six staff and have a walk-in clientele of between 30-50 customers per day. We are open 7 days a week due to popular demand. I cannot begin to describe the devastation that these proposals would cause my business. The impact on firstly, my staff who use the car park on a daily basis and then my customers who park there and then walk into the Village to visit us and other local businesses. Where would all of these people be expected to park? I do understand the need for more housing stock, but a well-used car park and ac community hub such as the civic centre are not the answer to this problem. Surely, a better solution would be to regenerate an area such as New Ferry which could provide an excellent area for new properties, with good transport links to Liverpool and the rest of the Wirral. I feel let down by Wirral Council’s proposals and my 10 years of hard work and commitment to Bromborough are now under threat.</p>
DOR00076	<p>We have heard there are plans to close Bromborough Civic Centre and we would like to protest at this plan. The Centre is used for so many activities not to mention the library which is housed there. We have heard there are plans to close the car par in Bromborough Precinct. We are very upset at this as we can see that it will destroy Bromborough Village. The shops in the village are very important not only to the people who own them but also to the people who use them especially those who do not drive.</p>

DOR REF	RESPONSE
DOR00077	The proposed development of the Bromborough Library and Civic Centre is yet another example of Wirral Council's almost Neanderthal attitude to community and learning. We had to fight for our library under previous plans, and although we only have limited opening now, at least it still exists. Close our library and our civic centre, and we will no longer have a community in this lovely village. Community assets belong to the community, not to the Council, who are there to manage them on our behalf. Re-consider these short sighted plans, and act as representatives of your community. I understand from village communications that the Council is considering the development of the above site, with a view to yet more housing in Bromborough. We are already at full stretch as a community with regard to infrastructure and this short-sighted suggestion can only make matters worse. The car park at Allport Lane is always full and facilitates the use of the village outlets by the whole community, especially those with limitations of access including our many elderly residents, and the disabled. If there is no car park, what are they expected to do? There is no additional parking available elsewhere. And what of the many people who work in the commercial enterprises within our village? We already suffer a great deal of congestion during the day and it can only get worse as parking is reduced and additional housing is crammed in at every opportunity. I understand that sites must be identified for future housing, but this is not a rational way to proceed. In an era when the death of the high street (and subsequent loss of business rates) is moored as a huge worry and the cohesion of community is held up as a desirable outcome, then only the most stupid of Councils would rip the heart out of a thriving village.
DOR00078	I feel that Eastham Village has a distinct place in Wirral's heritage. By building on the green belt land will eradicate the special village feel of the ancient village. Wirral has very little visible heritage so it is important to retain what it has. I do not believe that more housing is needed in the Eastham area, as the planned building on the Ruby field will be plenty for such a small place. There is proposed building at Hooton which will increase the housing stock in that area. Please register my disapproval to this proposal.
DOR00079	We are totally opposed to the closure of Bromborough Civic Centre This building is the heart of Bromborough Village. We are members of the library which we often use for reading books and the computer service. My wife also attends regular yoga sessions there. We pay our taxes to support such services and total objection to such a draconian closure. We are totally opposed to the closure of Allport Lane car park. This would be an absolute travesty if passed and would lead to the collapse of Bromborough Village Centre. Many excellent and much used businesses would be forced to close or move elsewhere. Elderly people would be forced to travel much further for their daily shopping.
DOR00080	I have read the plans for future development of the area around Bromborough Library, Civic Centre and car park area. I am not happy with the plans as I feel it is the waste of a building that is much needed within the Bromborough community. I feel it is my duty to try and protect our civic centre and library which are treasured buildings. I feel that the loss of this building and the car park would destroy Bromborough Village and the businesses therein.
DOR00081	It is with concern that we write regarding the proposed building on Green belt land, especially SP043 and SP044 The proposed number of houses to be build would put great strain on the existing infrastructure, particularly on the already very busy Spital crossroads which has many accidents. Each house would have 1 or 2 cars which would converge on the crossroads and affect surrounding roads (The Dibbinsdale Road could not expand and is already dangerous) and would also affect local schools and surgeries and increase parking in the area. Proximity to the Dibbinsdale Nature Reserve and the effect on the wildlife including the bat colony. It would damage the woodland and its character. Area is well used by people of all ages - young and old - walkers, bird watchers, school parties etc. for pleasure, educational and recreational purposes. Wirral is advertised as the leisure peninsula so this quality open space for recreation would be lost. There are also risks to the water supply and disposal of waste water in the area. This area has good quality agricultural land which is currently farmed, thereby fulfilling a useful purpose and valuable resource. Once built on it cannot be reclaimed and therefore is lost for good. We suggest that brownfield sites should be prioritized for building and not valuable green belt which are the green lungs of the environment.
DOR00082	I am writing to protest about the greenbelt in Spital. I live not far from Claremont Farm and I don't want it to be spoiled by building houses where I live and spoil the lovely countryside. Again we blame the Council for not doing their job right and now they are panicking because they don't want the Government to step in. Please think again before you make a decision and don't spoil the lives of ordinary everyday working class people. To build all these 858 houses it would cause traffic problems especially the M53. I am sure this will fall on deaf ears as usual.
DOR00083	I wish to know as soon as possible why my two stated developments are on the proposed allocation list. How did I get on this list when I have started development and followed all regulations and protocol within the due date? How do and when will I be off this list.
DOR00084	We would like to register our utter disgust and dismay that the above development could even be considered. The Green Belt is what makes the Wirral so unique with all its wildlife and green, open spaces. The following are points we would like to raise: 1. Where are all these thousands of people who require "affordable housing". We are not aware of any on the Wirral. 2. How can land that has obviously satisfied the 5 criteria which gives it green belt status and has done so for very many years, suddenly loose this? 3. Our local schools, doctors' surgeries & hospitals are already over-subscribed, where and how will all of these thousands of people fit in? 4. We have worked and saved hard in order to build a home for our family, which overlooks beautiful green belt meadows. We have lived here for 24 years. Our house is our pension, who will compensate us for the devaluation of our property, if the green belt next to us is developed? 5. The only people to profit if this development goes ahead are the Landowners, who stand to make millions. Is their primary motive to help people gain "affordable homes"? We think not. Their motivation is money. 6. The question of "affordable housing" what a joke. Build houses on brown belt land, were they are needed, which is not Wirral's green belt. We do not need or want them.

DOR REF	RESPONSE
DOR00085	I wish to register my objections to the release of all Green Belt land on Wirral and in particular Green House Farm Greasby. Why is there a need to build so many new houses? Walk down almost any road in the Borough and you will see houses for sale. Who is going to buy these new houses? Wirral is a small self-contained area. There are only so many jobs in the area. Many employees including the Council have reduced their staffing levels. If people don't have jobs they can't afford new houses. On one site alone in Greasby, there is a proposal to build 534 houses. This means a potential influx of 1000+ new residents. All these people will need access to doctors. It's hard enough to get an appointment at local surgeries as it is. There could be several hundred children needing school places. It is doubtful that the local schools could absorb those new pupils. The Council has previously declared in Policy OLE 18 that "it would afford a high degree of protection to sites of ecological importance. There will be a strong presumption against any development on or close enough to affect adversely sites of special scientific interest, local nature reserves, sites of biological or geological importance and other features or areas identified by the Council as being suitable for protection on nature conservation grounds. Wherever possible the network of linear natural habitats and wildlife corridors will be protected and enhanced". Greasby Copse and Green House Farm are definitely covered by this statement. The area is home to a wide variety of wildlife. Development would also mean loss of prime agricultural land. Surely with Brexit looming we need to retain our farms, not destroy them.
DOR00086	I am concerned about both housing and the fate of the Green Belt. In the past the green Belt was created by volunteers and council etc. with great enthusiasm and dedication and much time and money, wanting the best for Wirral people and visitors. Conservation of wildlife was a major issue. Many professionals and volunteers involved. In your planning please give priority to all brownfield sites before looking at green Belt. Please avoid spoiling historical, archaeological sites and most of all the future and protection of wildlife as far as possible.
DOR00087	I am extremely disappointed to see our local council on the threshold of folding under pressure from Central Government to allow unnecessary and unwanted housing developments on agrarian green belt areas notably in Pensby, Barnston and Thingwall. These open green spaces are the only visual respite from the urban sprawl that surrounds them. The green belt offers vital habitat for a plethora of wildlife, some of which may be endangered species. The land is more suited to farming and may offer valuable food sources in the future should our EU negotiations not be favourable. To lose it all to speculators and property developers would be folly. The question is why the Council isn't fighting tooth and nail to protect these areas, the existing brownfield sites and Wirral Waters should be sufficient to cover any housing needs for the future. There is no hard evidence to support the Government's arbitrary numbers policy. With regards to the proposed development site SP061 adjacent to Gills Lane is cause for concern. I believe any development in this area will have long term adverse effects on the living of the locals. Gills Lane, the only thoroughfare to the proposed site is far too narrow and winding to accommodate wide loud convoys of heavy articulated vehicles conveying plant machinery and building materials incessantly to and from the proposed sites, the traffic vibrations, noise and pollution will have an unrelenting and disruptive effect to everybody in the area not just for a few months but perhaps 5 years. Motorists, bus routes, pedestrians, refuse services, deliveries, school children, pensioners who rely on prescription deliveries, care workers and emergency services will all experience delays and traffic congestions on a regular basis; some perhaps life threatening. Thorncroft Drive numbers 1-11 share boundaries with the proposed site at the rear of their houses, the gardens or rear land areas are particularly small. Such close proximity to any building development would be totally unacceptable to any of the residents. The level of noise, vibration and pollution created from the site would cause considerable distress, allowing the residents to extend their boundaries at the rear of their properties by several metres would and could be the only solution to lessen the impact of a project of such magnitude; perhaps, to ensure that the residents are fairly treated, the Council could make that a condition of the planning application, after all, why should the speculators and developers get everything leaving the residents with nothing, their investments devalued, their views and space gone.
DOR00088	Plans for East of Ferry Road, Parcel Ref SP055 opposite to Eastham Lodge Golf Club and adjacent to the QEII Dock are not acceptable to us. 1. The road will be elevated and the height of any housing development will tower above this bungalow denying us light and warmth. The varying levels of land demand a site visit. 2. There are two active pipe lines crossing this land, from Tranmere to Shell and to Nu Star. They are not very deep in the ground. 3. When the QE Dock was built, information from the Manchester Ship Canal, now Peel Holdings Environmental described the setting as a dock in a rural landscape. It made up of land and green belt much neglected. The Government White Paper incorporated in the 1949 Manchester Ship Canal Act of Parliament specified that views had to be maintained and there is no doubt that walkers down Ferry Road appreciate the open views after the build-up areas. 4. The reason we live here is because my husband's family farmed at Bankfields on this land before the Manchester Ship Canal was built. His great uncle, grandfather and great grandfather lived through this construction 1887-1894. His father and family suffered the building of the QEII dock 1949 –1954. Now more worries are ahead of us in old age.
DOR00089	I am writing to object to the planned building of flats next to my house. SHLAA1127 is its site reference. It is at the top of Church Street and Liscard Rd. I have several objections. 1. I own the property, on Liscard Rd and the proposed building would be next door. It is to be rented accommodation and has the ability lower the price of my house on the market for this reason I am against it. 2. There is only a small amount of top soil, then its sandstone. Due to the age of my house, building this close to it, can and will cause land movement which would be damaging to my property. 3. My property extends 4 ft. around my house, land which the Council has tried to adopt. The plan is that this land will be used to grant all of the homes access to the rear of our properties. This is something that I do not wish to happen as it is to be fenced off as soon as the land changes hands or is disturbed in any way as I will be claiming my land back. Also this piece of land would then be the only entrance and exit point to the back of my and other's property which with no proposed form of gating would provide a security problem to my property as any could gain access to the back of all the houses without being observed.

DOR REF	RESPONSE
	<p>4. Marks the land that has been adopted by myself and has looked after by only myself for the last 12 years. It has a cultivated garden on it and has been a space I have grown a herb garden and other produce year after year. It is also partitioned off with low wooden planking.</p> <p>5. This land has been adopted by my neighbours for at least the last 15 years.</p> <p>6. The proposed parking arrangement for all 10 flats, 8 parking spaces, and this area already has insufficient parking for the houses that are here already. Thus attempt to provide adequate spaces is not good enough and would place more strain on the already overtaxed space available. The small amount of space remaining must be kept clear for ambulance access to the home over the road and on Liscard Road; no more space can be taken as it's a crossing with restricted access in the first place.</p> <p>7. Some of the site is the space that the homes on Liscard Road have been allocated to leave out bins. They can't be left on Liscard Road as it would block the crossing and the proposed design would give us residents no access to this area and nowhere to leave our bins for collection that would not be a safety issue.</p> <p>8. It is written into my Land Deeds that I have the right to build non-permanent structures over this whole piece of land which I have done in the past and will continue to do in the future obviously building here would violate my rights in this respect.</p> <p>9. The group that proposes to build here used to be Liverpool Housing Trust and have always been ridiculed for their lack of maintenance on their properties (even in National papers). The Land in question has very poor drainage and is prone to flooding. Nobody has mentioned how they propose to build safely on the old well, I believe is on the property. There will be Privacy issues as it will be overlooking the bathrooms of all the houses and allow others to see into all of our property yards. As the building is for 'open rent' there is no telling what type of person would be granted a view into our houses and property [A site plan was also submitted providing a visual context for the objection].</p>
DOR00090	We write with regard to the above planning and building proposal for the properties at the rear of Pensby Children's Centre. Fishers Lane. To this end we are lodging an official objection to the building of these two-storey properties directly at the end of our gardens. Therefore overlooking all of our retirement bungalows on the right hand side of Copeland Close affecting 13 properties in total. Whilst we understand the need for 13,000 affordable houses have to be built within the Wirral area by 2035, why is it necessary to build in our village therefore creating more traffic on Fishers Lane which is busy enough as it is now. We have counted the allocated parking areas which come with the proposed properties and it equates to 70 cars as extra traffic along our roads. This is the second time that we have voiced our objection to this proposal and would appreciate if this matter could be shelved permanently. Surely it is not necessary to build on these fields. A better proposal would be to allow the existing community to use the fields for its children.
DOR00091	same as DOR00090
DOR00092	same as DOR00090
DOR00093	same as DOR00090
DOR00094	same as DOR00090
DOR00095	same as DOR00090
DOR00096	same as DOR00090
DOR00097	same as DOR00090
DOR00098	We as a community within the area of Pensby Village object to the proposed development of the playing fields at the rear of the Children's Centre on Fishers Lane. The fact that we are a village and not a town should be acknowledged and respected by the government and we should be allowed to stay as we are. A Village. Whilst we understand the need for 13,000 affordable houses have to be built within the Wirral area by 2035, why is it necessary to build in our village therefore creating more traffic on Fishers Lane which is busy enough as it is now. We have counted the allocated parking areas which come with the proposed properties and it equates to 70 cars as extra traffic along our roads. As Pensby Boys School is now closed cannot half or all of the playing fields there be used, if you are insistent on developing here? This is the second time that we have voiced our objection to this proposal and would appreciate if this matter could be shelved permanently. Surely it is not necessary to build on these fields. A better proposal would be to allow the existing community to use the fields for its children.
DOR00099	same as DOR00098
DOR00100	same as DOR00098
DOR00101	same as DOR00098

DOR REF	RESPONSE
DOR00102	<p>I am writing due to concerns I have regarding building work proposed. We have been using this area as a communal area with a garden and play area for our children. After much discussion it was decided we would try to purchase this land. I have been trying to purchase this land for a number of years, knowing we can't build anything substantial due to the structure of the ground, suddenly; an entire block of flats is to be built there? I managed to contact the people involved in this proposal only to find out they don't even want all of it! With the old well and drainage issues due to the sandstone and brown land, how close they want to build doesn't take into account the lack of foundation on not just on my property but our neighbours also. We aren't able to build permanent structures on this ground for specifically these reasons. The drainage issues themselves would be horrendous and the angle of the ground with it being stone with no significant ground cover makes for rain water to easily penetrate the top soil that is there, to pool between the rock and soil, would cause the ground to drain straight to our garden and house causing massive damp issues to already vulnerable brick due to its age alone. With no foundation on our property or indeed any of our terrace there is no resistance to land or ground movement of which there would be significant amounts, especially with how close they propose to build. They are also talking about building so close that a portion of the land we own would then become common entry for all the properties! So just immediately looking at the proposed plans there is no allowance for bins. When you look at the size of this proposal bin collection point is not of sufficient size when you think a potential 3 bins x 4 houses. This is not an area of a public crossing on a main road with regular and heavy traffic which has lorries and buses on it and also a bus stop just at the end of the terraces also is not a safe or appropriate place for bins or people or indeed a bin lorry to stop. This is a 3-way intersection on 2 school routes, with a palliative care home on the corner which requires regular ambulance visits. It is also only about big enough to hold one bin, not 12. There is a protective fencing for the public crossing which reduces the proposed area even further and is also next to our front room window. The only window we have on our ground floor and would prevent us using the window especially during warmer months when we would want to have the window open to circulate air. This would necessitate a significant change to the bins, times, days, location, access to all the properties and use of and would significantly alter the visual aspects of the area. Then there is the issue of parking. There is a proposal of 10 flats. Potentially 2 cars per flat is 20 cars with 8 parking spaces. Parking is already an issue within the immediate area as existing residents already don't have enough space with flats of 3 stories over the road plus the flats all up and down the road, Church Street, Water Street going down to King Street, the vast majority of these properties are flats of multiple adults all with their individual parking. Adding 20 or more cars right on this intersection is simply not feasible. Also when considering how traffic is on the school run on this road and rush hour. Not to mention the effect on the value of our home. Also bearing in mind these properties are to be 2-bedroom flats, miserly 50 sq. m and expecting families to live in this is laughable at best. These are expected to contribute towards affordable housing? For the people formerly known as Liverpool Housing Trust, they have an already tarnished reputation and disreputable reputation for their upkeep on their properties. A family vehicle, a small one, takes up 11.5 sq. m. I find this laughable that a family with children would be able to comfortably live in such a tiny space. When all the families who could live here have realised, yes they may be able to afford it but it offers no value to their lives, especially a growing family. They will move out and word would spread about tiny they are and at that point you have a population who is willing to live in such a small space are going to be of disreputable disposition and there is already a significant amount of antisocial behaviour with drugs and drinking involved and this would have a direct expansion of these problems and most likely it would end up as a property similar to run down, filthy and disused HMO's. We already have issues with noisy groups of people of all ages causing a feeling of lack of security in our own homes already. We regularly look out our window to witness gatherings of drunken violent people causing damage to people and property. Another reason I wanted to create a safe green place for all the little ones in my life. So I am very concerned on several levels about there being flats being built on this little bit of brown land which is no good for building permanent structures. So if you go as far as to think that perhaps my own Council would still after all this, allow this to continue, to let Liverpool Council lean on us this way, would a proposal of alterations to the plans occur. [A site plan was also submitted providing a visual context for the objection]</p>
DOR00103	same as DOR00098
DOR00104	same as DOR00098
DOR00105	same as DOR00098
DOR00106	same as DOR00098
DOR00107	same as DOR00098
DOR00108	same as DOR00098
DOR00109	same as DOR00098
DOR00110	same as DOR00098
DOR00111	same as DOR00098
DOR00112	same as DOR00098
DOR00113	same as DOR00098
DOR00114	same as DOR00098
DOR00115	same as DOR00098
DOR00116	same as DOR00098

DOR REF	RESPONSE
DOR00117	same as DOR00098
DOR00118	same as DOR00098
DOR00119	same as DOR00098
DOR00120	same as DOR00098
DOR00121	same as DOR00098
DOR00122	same as DOR00098
DOR00123	same as DOR00098
DOR00124	same as DOR00098
DOR00125	same as DOR00098
DOR00126	same as DOR00098
DOR00127	same as DOR00098
DOR00128	same as DOR00098
DOR00129	same as DOR00098
DOR00130	same as DOR00098
DOR00131	same as DOR00098
DOR00132	same as DOR00098
DOR00133	You will now have received the response sent on behalf of "Barnston Conservation Society" to the development options to the Green Belt review for my area. I am a long standing member of this group I fully support its outline recommendations and urge you to give it your full consideration.
DOR00134	<p>Loss of green belt should not be allowed at any cost. Loss of green Belt is forever. Our children and future generations will miss out on Wirral's unique heritage. There is plenty of brown site land that should be developed first. My own property backs onto Green Belt, and with other GB sites the following are my objections.</p> <ul style="list-style-type: none"> a. Horrendous increase of traffic on already busy roads (Green Belt behind me is adjacent to busy Irby Road) b. Loss of wild life, we have foxes, badgers, bats, birds of prey and newts. Loss of flora and fauna. c. Inadequate schools, GPs and other facilities. d. Are thousands of houses really necessary on Wirral? e. The housing targets identified by the Powers that be are out of step with local population growth figures. <p>Loss of Green belt is forever. Please, please reconsider. Profit is not everything in this life.</p>
DOR00135	I am writing to protest most strongly about your plans for future development on Green Belt land - in general terms and in particular in relation to where I reside in Barnston. As you can see by my address I live very close to your potential "infill Village" which will have a major impact on my life in the future. Please register my objections on your records.
DOR00136	I wish to express my total opposition to any alteration to the status of ANY GREENBELT land on the Wirral. The idea is catastrophic ill thought out and plain wrong. There are many unoccupied houses on Wirral and many brownfield sites which can be used without even dreaming of touching the areas which some dunderheaded nincompoop has thought of. The people of Westminster need to be told our views and oppositions to these plans. The whole idea needs to be condemned locally, bounced right out of the Council Chamber and bounced back to Westminster and filed in the nearest dustbin. These plans must never be allowed to come to fruition.
DOR00137	I strongly oppose the Council's proposal to build on Green Belt land in Eastham, and the removal of hundreds of mature trees which will drastically destroy a beautiful area. I understand there are hundreds of unoccupied properties in Wirral which could be renovated which would go a long way to save Eastham from destruction.
DOR00138	I am writing to express my deep concern at the plans to build on Wirral's Green Belt. Having previously lived in London for 30 years, I appreciate the beauty of the Wirral. Plans, such as you have put forward, will destroy the sense of villages surrounded by Green Belt, instead making it feel like a peninsular of housing estates. Surely, one of the greatest legacies we can leave to our future generations is the beauty of "England's green and pleasant land". I recognise the need for housing but surely brownfield sites could be considered first, even smaller derelict buildings and areas. Surely you do not want to be known as the Council which took the Green Belt away from the children of the future.

DOR REF	RESPONSE
DOR00139	Regarding the proposal to release the Green Belt land under Draft Local Plan, I strongly object to any building on the Green Bet while so much Brownfield land is available and so many commercial buildings are empty and unused. I realise that developers would rather build on virgin land. If the Council heeds the wishes of the people they are supposed to represent they will refuse permission to build on the green Belt and developers will be forced to build on Brownfield Sites. Please endeavour to preserve the beauty of Wirral's green spaces.
DOR00140	May we make reference to Saughall Massie Village conservation Area Society leaflet and autumn copy of Moreton Messenger, which both refer in some detail to identification by Wirral Council of potential sites for housing development? The Metropolitan borough of Wirral map of Saughall Massie shows details of between 889 and 921 proposed dwellings. Are they flats blocks, detached or semi-detached or terraced houses or bungalows? if Wirral is a Viking historical area of interest, including Greasby, adjacent to Saughall Massie, have all history societies with especial Viking interests had their opinion counselled as well Wirral Footpath Association with regard to re-routing of various footpath to and from Saughall Massie itself. These dwellings would constitute homes for an estimation of perhaps 2769 persons; our calculations based on average of 3 persons each dwelling. Where is the infrastructure to cater for so many persons? We think this scheme is flawed from the outset and are totally against bastardy of Green Belt purposes for the profit of individuals.
DOR00141	I was extremely upset when I heard that the Council planned to release large swathes of our precious Green Belt land for future house building. Most importantly, the protection of the Green Belt which has held firm for about 60 years has resulted in great benefits for all of Wirral's population by way of fresher air (a green lung) and opportunities for relaxation and enjoyment in the countryside. It has also allowed our farmers to diversify and provide welcome refreshment and fresh produce in their farm shops and pick your own fields. Secondly, as I have learnt more, the whole project seems entirely unnecessary and based on very faulty evidence. The 21st September ONS household projections for Wirral suggest 393 houses per annum requirement. This means that the proposed house building already projected by Peel and the use of other identified ex-industrial land for building leaves Wirral with absolutely no need to destroy part of its important Green Belt land. I most urgently request that the whole unnecessary idea of cutting into our important Green Belt is rejected immediately. I protest most strongly to any idea of destroying the car park in Bromborough and then knocking down the Civic Centre, just to add to a very few more houses to your very inaccurate plan for houses needed on the Wirral. Bromborough Village is a thriving and much loved centre for shopping and local business. I believe it provides about 400 local jobs. Without the carpark it would become inaccessible to many people, resulting in most shops and banks having to close down and adding many car or bus miles to access these facilities. As for knocking down the Civic Centre, which is an excellent and comparatively recent building, which would probably cost millions to replace and which is used by many local groups and classes, this seems a totally ridiculous idea! I cannot believe that this is a genuine plan and most strongly suggest that it is dropped immediately. As for knocking down the Civic Centre, which is an excellent and comparatively recent building, which would probably cost millions to replace and which is used by many local groups and classes, this seems a totally ridiculous idea! I cannot believe that this is a genuine plan and most strongly suggest that it is dropped immediately.
DOR00142	I have recently become a resident of the Wirral. I decided on the Wirral because of its location, close to the large centres of Liverpool, Manchester and Chester and, of course, because of the diversity within the Wirral itself. Very important for me was the scale of the green open spaces between attractive towns and villages. I am dismayed to read that the Council are considering the possibility of building on Green Belt land. In particular the potential infill at Oxford Drive, Thornton Hough. Thornton Hough is a beautiful village; it must be one of the key visitor sites in the Wirral. The charm lies not only the architecture but its location within agricultural land and green belt. It is unbelievable to me that the Council could contemplate an infill, ribbon development which would cut through this green open space and thereby destroy the very thing which makes it so special. At present Oxford Road is a small established development which is surrounded on 3 sides by agricultural land. This land is currently a viable use. In my view it is shameful to wantonly destroy this land. I have done some research on the Council's proposals and I would make the following additional observations. I believe the dwelling requirement figures of the Wirral for the next 15 years should be corrected to reflect new information from the Office for National Statistics. This makes it clear that the projected figures for new homes are far less than previously stated. Also, there is significant building proposed in other areas of the Wirral, for example, Wirral Waters, which should adequately cover the housing requirements. More importantly, there are brownfield sites which could and should be brought into habitable use, and this should be a policy vigorously pursued by the Council. Once it use green belt and agricultural land it is lost forever and this should never be allowed to happen whilst neglected brownfield sites become eyesores on the landscape. Surely it is, your, and our duty to retain and protect the rural landscape which makes the Wirral such a special place in which to live and to visit. I urge you to conserve this acre between Thornton Hough and Oxford Road for present and future generations.
DOR00143	We write to say WHY take green belt land for houses? Is it because it's easy to build on or what? In Moreton alone we have at least 3 sites for filling in. 2 schools were knocked down, Doubles Drive and beside the library also Cadbury's land. How much more is needed in the Moreton, Saughall Massie area. Then there's the infrastructure. Can it all cope all the utilities, Dr's? etc. Empty houses could be renovated. Birkenhead have the old "Leasage" ground. Most of the buildings or units are empty and could be converted, what all area to live in by the river. As you can see from the address we farm our grounds on 7th generation. Only 2 farms left in Saughall Massie Village if planning was given there would be none it would finish us both. The fire station is already an eyesore and there's talk of widening the lane from 3 lanes end to Blackhorse School. This lane gives the area a country feel is this so the fire engine can travel faster or to do with the proposed Hoylake Golf Course. A farmer, Ma Smith who farmed many years ago between Cow Lane and Millhouse Lane Moreton where his land went said this is only the beginning it will be concrete from here to Chester in 1970ish. This prediction could come true we hope not. [Petition against removal of Greenbelt protection around Saughall Massie attached]

DOR REF	RESPONSE
DOR00144	I wish to object, in the strongest terms, to the Council's Development Review which addresses greenbelt and agricultural land. The Wirral is a special place with beautiful countryside, coastline, charming towns and villages and large areas of green space. As a long term resident of the Wirral, I urge the Council to protect this extraordinary environment. Any local plan should both challenge unreasonable projections of future housing needs, as well as seeking to meet housing needs through development of brownfield sites. I write to you in the hope that the Council will seek to protect both green belt and viable agricultural land.
DOR00145	Please do not spoil Thornton Hough village by unnecessarily encroaching on the green belt and agricultural land for housing development. Surely the Wirral Water development, along with the many empty units which exist and could be made habitable, would suffice.
DOR00146	I am very concerned about the proposed plans' effect on our local community. New Ferry has lost its best since suffering an explosion. Bebington is very quiet since the closure of the Co-op supermarket. I can't believe the Council are considering doing this Bromborough Village. Bromborough Village is a thriving village centre with a committed community group looking after its interests. I regularly shop in the Village and use the hairdressers. The car park is well used on a daily basis, if it was closed cars would be parked in nearby roads causing inconvenience to residents. I have limited mobility awaiting a hip replacement and need to park near the shops as do high proportion of older and disabled residents. I am very worried about potential closure of shops if this goes ahead causing damage to the local economy as well as hardships to retailers and inconvenience to residents. I urge you to reconsider.
DOR00147	<p>I believe that the people of Wirral do not want this to happen, as was made clear to the Council at its various recent public presentations on the matter. Our green belt is a vital, life giving resource. Much loved, treasured, used and enjoyed by all, I'll say again ALL, its residents and not just the few lucky enough to be living around its fringes. I believe that sufficient brownfield sites have already been identified and made available on Wirral to meet the National Government target for new dwellings over the next 15 years. I've heard mention of a requirement for under 500 dwellings p.a. i.e. 7,500 homes over 15 years. Meanwhile I understand that 'Wirral Waters' project alone is expected to result in 13,500 new dwellings. This plus of course those others (3,000 i.e. 6 years supply) already contracted to be built on other brownfield sites over the planning period. The answer to the inactivity of developers of existing brown field sites should not be the release of further green field sites. It's easy to imagine their expected response. The Council's own Appendix 19 says it all. There is no requirement for any encroachment into the green belt. The Council's SHMLA of May 2016 for Wirral indicated an increasingly elderly population, a significant reduction in the number of people of working age and a reduction in jobs able to be supported by the local community. So where is the demand (for more homes)? Where is the means (to buy them)? In one of its presentations, the Council made mention of the consultation where the developer Peel indicated that they would not seek to build more than 100 houses each year in any one location to avoid market saturation. Apparently, another indication of expected poor demand? So where is the sense in needlessly releasing green belt land to the detriment of the community? Turning to the proposal for sites SP061 and SP062, two sites in the vicinity of my home. In its presentation entitled development options review – Initial green belt review methodology, of September 2018, the Council indicated that it would focus on the five purposes for the green belt, on not reducing the separation between settlements and upon the strongest boundaries. Then in the Core Strategy Plan – Development Option Review – Summary of Initial Green Belt Assessment of September 2018 it was recognized, in relation to SP061 and SP062, that the impact of the loss of best and most versatile land, as well as highway and transport capacity would require independent appraisal before their (SP061 and SP062) release from the green belt. Furthermore that in the case of SP062, that any such development would result in the merging and enclosure of Barnston Village with Heswall and Pensby. At the same time the Council's UDP Policy CM61 calls the need to protect the domestic scale and quiet character of Barnston as an historic rural village – hardly possible when surrounded by a housing estate. The NPPF framework requires that the Council checks the unrestricted sprawl of built up areas; prevents neighbouring towns merging together; assists in safeguarding the land for countryside use and to preserve the setting and special character of historic towns and villages.</p> <p>In relation to the special character of the land and the requirement to assist in safeguarding it for countryside use I would refer to the Council's Initial Review Revised Methodology on the subject of High Quality Agricultural Land (Appendix 7) and the subject of Core Bio Diversity (Appendix 5). Appendix 7 recognises that much of the land in both SP061 and SP062 to be of high quality agricultural land; whilst Appendix 5 attributes them to include areas of core biodiversity. Further reasons for these 2 sites not to be released for development. In relation to the requirement to prevent neighbouring towns merging together and the importance of sound boundaries. It is self-evident that any development of SP061 and SP062 would be contrary to both (a) checking of sprawl of large built up areas i.e. Heswall, Pensby and Thingwall, and (b) the preservation of the setting and character of Barnston Village. At the same time the current system of durable hard surfaced, adopted public roads around both sites provide a clear and appropriate (in view of the aforesaid) and supporting delineation for both sites to be maintained as green belt. Appendix 20 on the subject of Accessibility, contained in the Council's Development Options Review documents – initial green belt review background report, evidences the acute traffic (accessibility) problems that already exist and would be made significantly worse should these two sites be developed for housing. The sites are encompassed by just 4 roads i.e. A551 (Barnston Road), the B5138 (Pensby Road), Whitefield Lane and Barnsdale Avenue and separated by Gills Lane. Both Pensby Road and Barnston Road are in heavy use, significantly by residents commuting to work (both north and south along the M53 motorway) and these and their access roads (Gills Lane, Whitfield Lane and Storeton Lang are already the subject of congestion mornings and evenings. How much more so should SP061 and SP062 be allowed to be developed, either separately or together? Barnston Road (A551) is also a designated accident blackspot with restriction already in place on its use by heavy goods vehicles through the Barnston Conservation Area. Wirral's green belt, its trees, plants, agricultural activity provide the very air we all breathe. It is our 'lungs' as it were. We shouldn't permit it to be built upon. Its beauty, tranquillity, restorative power lost forever under tarmac, housing estates, noise and yet more pollution. For our Borough to become just a place to exist in but no longer one to enjoy living in. Please don't release it unnecessarily just so as to meet questionable targets based on possibly flawed projections.</p>

DOR REF	RESPONSE
DOR00148	Although the Government says Wirral Council must build 12,000 houses in the next 15 years they added the important directive “right homes in the right places”. If Wirral’s plans are put into operation this will not be achieved.
DOR00148	Their own projection for population growth during this period does not warrant the need for 12,000 homes. To fulfil this alleged requirement Wirral Council are prepared to use green belt land although there are enough brown field sites. Their own projection for population growth during this period does not warrant the need for 12,000 homes. To fulfil this alleged requirement Wirral Council are prepared to use green belt land although there are enough brown field sites. The green belt should be totally protected. 1. It prevents areas of population from amalgamating into large conurbations 2. It maintains a healthier environment with regard to clean air, so less pollution. 3. It helps to prevent climate change which is very important 4. It allows wildlife, plant and animal to survive and thrive 5. The small gardens of modern houses are no compensation. They are often concreted over for further car parking. 6. The reduction of open ground for drainage makes flooding more likely. 7. I notice that Site SP013, west of Column Road, West Kirby is designated site for development. Its position beside Stapledon Woods would cause great disturbance there. The destruction of green belt sites anywhere on Wirral should be prevented, including green field sites that are agricultural and likely to be vital in the future. They are certainly not “the right place” for any development.
DOR00149	My objections to the plan outline in your presentation at Hulme hall several weeks ago support those made by the voters present then. Firstly that the statistics and building figures imposed upon Wirral by the Central Government need very rigorous challenging by a neutral party. They have the power to reduce the attractiveness of a part of Wirral, CH63 which only a year or two years ago was voted the most desirable place in England to live in, one of the those attractions mentioned being its green spaces. These are the very places you acquiesce in losing because Central Government tells you to. Secondly, your arbitrary and self-imposed notions that any such potential area should be already be enclosed or be bound by a hard border, e.g. the area east of the M53. Please say why? Other than these notions allow you to slew your choice of suitable land towards Bebington, keeping wealthier parts of the borough relatively free from loss of amenity. There is also, in passing, the consideration that two university academics and one ex-army gentleman have long been making a strong case that the targeted area of Storeton, Brackenwood and Bromborough is the site of the important pre-conquest Battle of Brunanburh (Bromborough) in 937. They have a strong and growing following and findings are soon to be revealed following ground radar tests in certain Bebington locations. You should be preparing to build a Visitor Centre never mind a concrete jungle. But my chief objection is that despite their wholesale acceptance of central Government predictions as to our future housing needs, local councillors of the two main political parties, failing apparently to think about our future needs themselves, have placed beyond use large brownfield areas upon which many dwellings could be built, placed then beyond use by happily selling them off to the largest land acquiring business in the UK – Peel Holdings. With no binding preconditions set as to the use the land should be put to. Only based on promises which keep changing. I asked a young man at the meeting why Peel Holdings could not build all the housing required on their easily acquired land, the answer was that even if they could be persuaded, a very big IF, it would necessarily mean high rise, high density housing and the Council is committed to building family homes. If instead of placing families in high/medium rise flats, they were built to be suitable for and available to over 60’s owner. I think many, many older singles or empty-nest older couples might be happy to downsize to a comfortable, safe, well catered for property in a gated community, leaving their own two, three and four bed house throughout Wirral available for families. They could realise a lot of capital this way. High density building therefore can have the result of freeing up family housing. Problem solved. Or is that easy. Perhaps the Councillors who were so ready to lose us our brownfield sites because Peel Holdings were going, at one point, to create an exciting luxury Shanghai style stretch of waterfront properties will step forward and explain to their votes how they are going to reverse the damage they have laid them, the residents of Bebington, Bromborough and Eastham, open to as a result of their reckless choices.
DOR00150	same as DOR00098
DOR00151	same as DOR00098
DOR00152	same as DOR00098
DOR00153	same as DOR00098
DOR00154	same as DOR00098
DOR00155	same as DOR00098
DOR00156	same as DOR00098
DOR00157	same as DOR00098
DOR00158	same as DOR00098
DOR00159	same as DOR00098
DOR00160	I write to strongly object to the release of Green Belt land in Wirral, notably the area in Heswall designated SP071 on the Forward Planning proposals for new housing. Green belt land around towns is necessary to prevent urban sprawl while its use for farming should be encouraged in order to help feed the population in future. With reference to the open letter from Council Leader dated August 2018, any need for housing development is not sound enough reason to release Green Belt to fulfil Wirral’s Local Plan. The stated figures are apparently not based upon the demand for new housing which is primarily linked with industrial and employment growth. House building on the proposed scale would therefore lead to an increase in the number of empty properties, particularly in areas which are currently in need of regeneration. The fact there there is a perceived shortfall of house building in the recent past supports the hypothesis that demand for housing on Wirral is

DOR REF	RESPONSE
	<p>not rising to the extent anticipated.</p> <p>The excellent joint “Wirral Waters” initiative between Wirral Council and Peel holdings regarding the “Brownfield “ development of the Birkenhead docks area will provide both jobs and housing. The Council’s first priority must surely be to ensure that this initiative successfully delivers both industrial growth and the housing expansion envisaged in the Local Plan. I understand that it is a clear objective of Government to protect the nation’s Green Belt, virtually at any cost and to encourage developers to build on Brown Field sites and, to that end, that a press release on 5 March 2018 from the Ministry of Housing, Communities and Local Government had emphasised that councils should prioritise Brown Field sites for redevelopment. The release emphasised that Green Belt land should be preserved and protected and that urban sprawl should be limited as much as possible; thus only in the most exceptional circumstance could any type of development be approved on Green Belt land.</p> <p>Furthermore, I understand that, in July 2018, the Government published guidance in the National Planning Policy Framework aimed at protecting green Belt land, para. 145 stating that development of Green Belt areas could only be approved in very special circumstances which outweigh the resulting harm to the environment. I particularly object to the development of the area in Heswall designated SP07. This plot is alongside the Chester Road (A540) and, other than the existing ribbon development alongside the road, has much inherent natural beauty, ecological value and agricultural purpose with little, if any, scrub land. In addition to the adverse impact on the environment of building a new housing development in this area:</p> <ol style="list-style-type: none"> Any new access route via Suncroft Road through the existing residential area would be dangerous. Existing roads in the area are narrow and suffer from a large number of cars accessing Barnston Primary School, safe parking proving difficult to find. The main A540 is already busy with dangerous junctions, in particular at Gayton roundabout. I understand that outline planning permission has already been given for the building of 35 homes on a piece of land alongside the road, a short distance away within Cheshire, which will exacerbate the danger.
DOR00161	same as DOR00098
DOR00162	same as DOR00098
DOR00163	same as DOR00098
DOR00164	same as DOR00098
DOR00165	same as DOR00098
DOR00166	<p>Special character of Wirral – historic villages, Viking heritage and archaeological sites, open spaces, wildlife, outdoor leisure activities, all promoted by council to encourage tourism. I disagree that any green belt land needs to be released at this stage as the figures have been widely disputed and many houses would be built unnecessarily, resulting in a surplus in the local area. The Council must first make every effort first to reduce the number of empty properties, take into account the applications that are currently in the planning system and those planning application that have been approved but not yet started. Wirral Council’s stated aim is to build as many houses as possible on West Wirral so as to maximise the Council’s income from Council Tax revenues. This is counter to the wishes of many Wirral residents and is insufficient reason to build valuable houses on green belt land. It would be unlikely to fulfil the need for affordable homes. The council has failed to demonstrate any ‘exceptional circumstance’ required to justify breaching green belt land. Release of the proposed sites would contravene all 5 purposes of green belt. The merger of separate settlement area is disputed by residents who were not consulted when the Council did this some 5 years ago. I maintain that Irby, Thingwall, Pensby, Barnston and Heswall are separate settlements and have always been considered as such by residents. Therefore the continuous corridor of green belt should remain. <u>Infrastructure</u>: No green belt land should be released for building until Government funding has been agreed for building the essential infrastructure and necessary amenities: extra roads, schools, doctors’ surgeries, public transport hubs, community centres, emergency services stations, hospital, parks etc. Without these extra resources there would be huge pressure on existing amenities, shops and core services as well as accessing them.</p> <p><u>Demographics</u>: Local estate agents reported earlier this month that most house moves (85%) on Wirral are moves within Wirral and the local population has been reducing for some years. Widely available figures of local population growth do not substantiate the housing targets identified by the Council. The population of Britain as a whole is ageing, with a comparatively higher number of retirees on Wirral that general trends across the country. This suggests more of a need for care homes and sheltered accommodation than family housing and would require far fewer new builds and reduced land requirements than proposed. <u>Traffic</u>: Because Wirral is a peninsula with areas of common land that cannot be crossed by road, the proposed vast increase in households created by ‘filling in the spaces’ between villages would create more congestion that the Wirral area could cope with. Especially as people will be forced to use their cars to access facilities due to the isolated nature of green field sites, as has been reported this week in other areas across the county. This is a time when Wirral Council is committed to reducing pollution, not adding to it. Employment opportunities and economic impact: The proposed sizeable increase in family housing and creating new neighbourhoods is not supported by the number of employment opportunities across the Borough or in nearby areas. Many of the proposed sites are used by businesses such as farms and livery yards. Their change of use to housing would result in the loss of these businesses, the jobs they provide and income they generate. Biodiversity and public amenities: Wirral has a good percentage of open spaces which are well used, valued and enjoyed by residents and visitors. It is widely known and accepted that access to natural habitats such as footpaths, woodlands, bridleways etc. is beneficial to peoples’ mental and physical health. Wirral’s open spaces are the home to a wide variety of vegetation and wildlife. They provide feeding and breeding grounds for many diverse species, some of them protected, as well as being enjoyed by humans. A loss of these areas would have a negative impact on people and the environment alike.</p>

DOR REF	RESPONSE
	<p>ISSUES RELATING TO SPECIFIC AREAS OF GREENBELT LAND AT SP059B AND SP060. I live [in proximity to] SP060 and very close to SP059 so I have some detailed knowledge of the area and some major concerns. <u>Flood Risk</u>: My biggest concern is the very real prospect of my house and others flooding. The Environment Agency website shows a medium to high risk of flooding from rivers to those homes close to the brook along South Hey, Porto hey and the end of Woodlands Road. I am aware that properties Woodlands road has been flooded in the past. The Agency's website shows there is also a flood risk from surface water along Woodland road itself. It is currently low, rising to medium outside my house to the end of the road. Our front gardens regularly flood from surface water to the extent my neighbour uses a pump to expel excess water. In a rainstorm at the end of the dry spell in August this year, the road flooded. The land review of SP060, along with Harrock Wood, absorbs a great deal of surface water including run-off from the higher ground on Irby Hill, as do surrounding gardens and other trees in the vicinity. The land at SP059B, C, D and E also absorbs surface water and has drainage problems as it is low-lying and wet. This can't be seen clearly from ponding, the type of bog vegetation growing among the grass and measures taken by some of the landowners (one has recently installed a large sump) to mitigate the problem. Changing the use of this land from open ground to hard surface will remove the buffer zone and put my own and other properties at a much higher risk of flooding. National Policy states that inappropriate development in areas at risk of flooding should be avoided. While it may be possible to flood-proof newly built homes to some extent, it is not possible to protect existing properties. <u>Local Land Use</u>: The land at SP060 is high-quality, well-maintained farmland used in food production. There is currently a great deal of concern over Britain's food security with Brexit imminent so it is prudent to encroach on farmland a very last resort. The Council could consider taking over the farm and running it as a tenanted farm themselves, with a view to allowing young people to gain a foothold in agriculture. Another appropriate use for lower grade open land in some areas of the local plan may be to encourage greater leisure use. Statistics from University of Liverpool show that there is a higher density of horses per head of population in the Wirral than anywhere else in the country. Wirral would be an ideal place to create a major equestrian centre catering to a range of horse sports with space for cross country and show jumping courses. This would keep much of the land 'open' and would allow it to be changed back to agricultural use if future national policy shows that the need arises. This land has a network of footpaths and access to open spaces for walkers and dog walkers and is very well-used and enjoyed by many people. Their loss would certainly put pressure on nearby sensitive areas such as Thurstaston Hill and contribute to its erosion. <u>Wildlife, biodiversity and nature conservation</u>: There are bats and badgers near my home, both species habitats being protected by law. The fields at SP060 are an important autumn migration ground for many hundreds of pink-footed geese that feed on the wet land. The diverse range of habitats locally makes for an equally diverse spectrum of wildlife and vegetation. A nature trail and bird watching 'hides' across the swampy fields leading into Harrock Wood would relieve some of the pressure on more sensitive areas and would preserve precious habitats while allowing people to appreciate them and allow children to learn outside the classroom. Other consideration: the lower end of Woodlands Road is unsuitable for through traffic. It is single-track and cannot be easily widened as the strip of land between the houses and the fields is unadopted. The only way in and out by vehicles is from Irby Road which is difficult at certain times of day. Further development in the area would increase the traffic on Irby Road and significantly restrict access to an already busy road that serves Pensby School in one direction and a junior school, day nursery and village shops and library in the other. There are likely to be similar problems to traffic flow on other roads in the vicinity. There is already a reasonable case for traffic lights at the junction of Thingwall Road/Irby Road. A great deal of money will have to be spent, plus a detailed study into traffic flow and amenities is needed before committing to remove the green belt status.</p>
DOR00167	<p>Save our Green belt land – don't sleepwalk into ruining Wirral forever! I am particularly concerned about land in the Irby area as this is where I live and will have the biggest impact on me and my family. However I don't want to see any of Wirral destroyed. 1. My family keep rescue horses on a rented field in Irby. The horses need the field as their home. 2. We ride through the woods following the bridle paths – enjoying the beauty nearly every day – people needs space to ride safely off roads especially children. 3. We also walk our dogs through the woods and fields. People would lose their places to walk. 4. Wildlife lives in the woods and fields. Rare birds and flowers will lose their habitat. 5. Flooding – we get lots of flooding in the area due to the ground being clay. The stream often overflows after heavy rain and the fields gets surface water just sitting on top. 6. Impact on local facilities. It is already hard to get an appointment at the doctors'. Schools (primary) are full. 7. It would become more like a town – not a village. In Irby people know each other and friendly and talk to each other. Many families have spent their whole life here. 8. House value: We have recently bought a house in Irby and have a large mortgage. We don't want to see a drop in the value of the house if more affordable housing is built. 9. Air pollution: I avoid going to Birkenhead as it makes my chest heavy. I was told by a doctor it was congestion caused by pollution. Don't increase pollution in Irby. Before you even consider using any Green Belt land, you need to: ● Get the figures straight; ● Utilise empty houses; ● Use derelict waste land which will improve those new areas while providing houses; ● Make Wirral Waters stick to their original plans. Don't give our land to builders – the choices you make now will affect our future forever.</p>
DOR00168	<p>I am saddened and alarmed at the Council's proposal to sell off/use green belt land for housing development. I live in the Wirral because I like and value our open green spaces and woodlands which are a haven for wildlife, nature-lovers, ramblers, horse riders, cyclists and family walks. If these areas are used for housing our future generations will be deprived of the pleasures others have been able to enjoy. The use of the outdoors should be encouraged not taken away. As far as I understand from newspaper reports and the views of various Councillors, the projected housing need has been grossly exaggerated and can be met by the use of brown field sites, of which there are many. There are areas of Seacombe and Birkenhead badly in need of redevelopment, areas which have fallen into disuse and areas where buildings have been demolished and the land left wasted. Please concentrate house building in such areas as these, which is blight on the landscape and leave the green belt land alone. Make sure Peel Holdings build the houses they are supposed to build. Once green belt land is used it will be lost forever as will the special nature of Wirral.</p>
DOR00169	<p>I am exceedingly distressed by recent proposal to release green belt land in Wirral, for the purposes of building houses. The Wirral is a beautiful place to live with many spectacular views and a vast array of wildlife. I have grown up here, in Irby and can honestly say that I have never been anywhere else in the country that had so much to offer its inhabitants whilst still retaining all of the natural</p>

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	<p>beauty of the countryside. Having the ability to ramble/run/cycle or horse ride through fields of grass or along woodland paths is of enormous benefit to both physical and mental health. Access to free and enjoyable exercise routes encourages families to participate in activities together. It also builds a sense of community as people regularly meet and interact with each other whilst walking their dogs etc. If you allow thousands of houses to destroy our green belt, forcing us to move from living in friendly, close-knit communities, into sprawling towns, we will lose everything that we value about where we live and our way of life. Additionally, lack of exercise leads to obesity, ill health and depression which are strains on our already struggling NHS. Furthermore, there has been a steady decline in the numbers of wild animals with some close to being added to the list of endangered species. Building on green belt will destroy millions of habitats and cost many animals their lives. This year there has been a significant reduction in crop production due to several months of excessively hot temperatures during summer. As a horse owner, I have found it extremely difficult to source hay and straw for the coming winter months and the cost of bales has more than doubled from many suppliers. If we lose ever more land to houses, how do you propose that we continue to feed ourselves and our animals? In conclusion, I hope that the Government reconsider their plans to release green belt for building on. There are numerous sites on the Wirral for example, walking around Wallasey, Seacombe and Birkenhead, where land has been developed and then allowed to fall derelict or where whole streets of houses have been demolished and the land left barren. It would be far more feasible to rejuvenate these areas than to destroy well established, natural habitats or crop fields, running beautiful hamlets in the process. Perhaps, financial incentives could be given to encourage people to extend existing properties and for families to live together?</p>
DOR00170	<p>I am writing to you about the concern of Green Belt land being built on. My main concern is Irby area as this is where I live and will have the biggest impact on me and my family. However I don't want to see any of Wirral destroyed. Irby: We keep horses on a rented field in Irby near the woods most are retired but some we can ride and they need it as their home; the woods and our fields often flood despite having drainage under them; often after heavy rains the stream, near our horse field, over flows flooding the field and woods even more; the woods surrounding our field is home to rare birds of prey, like hen harriers and buzzards and you will be turning Irby from a village into a town, and not everyone likes living in towns. Wirral: We need the wood and fields to have a safe area to ride of the road across especially children who ride; loads of people go on walks through the woods and over fields not only to get exercise but also to take in the scenery; we need to protect our environment, not destroy it; people choose to live in the Wirral for the beautiful scenery and sometimes for the peace and quiet; by building on green belt you will be wrecking the Wirral for this generation and also future generations. They are just a small fraction of the reasons why you cannot build on Wirral's green belt. Instead of building on green belt build on the rubble land and do up the old derelict buildings. It would make more sense doing up the old, ugly places and making them look nice and pretty than wrecking Green Belt. DO NOT build on any Green belt until every other possible option has been used.</p>
DOR00171	<p>Please do not take our Green Belt land away from us! It is our future - when it has gone it has gone forever! We keep horses on a field in Irby some of the horses are retired rescue horse and others we are able to ride I love looking at all the trees, plants and wildlife. We get mandarin ducks on the pond in the fields and have seen Hen harriers which are rare birds. We also see pheasants, Buzzards and Newts. Please think about all the habitats you would be disturbing. At my school, we've been learning about protecting our environment and by doing this you're harming it instead and I want green belt to stay so future generations to enjoy as I am. Why don't you build on the messy land around the docks and make that a better place to live and why don't you do up all the empty derelict houses in the towns instead of turning places like Irby into towns. Not everyone likes living in towns.</p>
DOR00172	<p>I am horrified at the proposed development of this Greenbelt land. I live adjacent to [local area]. I moved here some thirty years ago because my property looked out onto the natural beauty of these fields opposite. This land forms a welcome natural break from the urban sprawl in Upton and Moreton. It is the very nature of these pockets of green and that makes the Wirral what it is. Many birds frequent this land including Herons, Heron gulls, Ducks and Canada Geese. To build on it would wipe out an important natural habitat for these birds and other animals. This would be a greater personal detriment to me and also my neighbours but more importantly to the Wirral as a whole. This land forms a natural flood plain for the Arrow Brook which regularly floods and breaks its banks during winter rains and storms. The houses in Sycamore Avenue are either level to or below the height of the Arrow Brook's bank opposite them. If this land was built upon and the brook breaks its banks, there will be nowhere for the water to go and our houses will be flooded. I would urge you to reject these planning proposals to build on our valuable and beautiful Greenbelt land. It has been here forever and it will be lost forever should these proposals be approved. [Additional photos attached to show extent of previous flooding in the parcel]</p>
DOR00173	<p>Although we do not appear to be directly affected by the current proposals, nonetheless we wish to object in the strongest possible terms to the proposed release of huge swathes of Green Belt land within the Borough. Whilst there is a little point in dwelling on what is past, there appears to have been inadequate consideration given to the progression of development of sites which already have the benefit of planning permission or to the release of brownfield sites as an alternative to the incursion into Green Belt land. Increased development as proposed will create a massive strain on the Borough's infrastructure in matters such as drainage, sewage and in particular traffic density. There is considerable pressure already on all roads leading out of Lower Heswall and this can only be worsened by increased development in the areas beyond. Traffic congestion arising from recent residential development (and further ongoing development) in the area of St. Peter's primary Schools is a source of huge concern to all local residents as it appears inevitable that serious and possible fatal accidents will occur as a result of the increased volume this has created.</p>
DOR00174	<p>We are not surprised but disheartened that Site "SP071 – land at Chester Road, Gayton" is being considered to be withdrawn from the protection of the Green Belt due to it scoring 73% of its potential to have the lowest impact on restricting urban sprawl (Background Report September 2018 page 12) and that it would be the fifth in line to the top four contained within Table 1. We would therefore like to comment on the proposal and present our concerns for the site being removed from the protection of the Green Belt in particular SHLAA1549 as this surrounds our property on three sites. Although we recognise that the Green Belt boundaries are not about protecting landscape, wildlife and the countryside in itself, but more about preventing urban sprawl and coalescence</p>

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	<p>of settlements however the impact of developing SP071 should be considered to the local amenity and despite being farmed its supports a number of unique and established natural areas that benefit the community by their openness and local character. In summary, our concerns lie within the following: ● Can it be truly be determined and demonstrated that there is an exceptional need for 281 executive homes within this area that outweigh the essential characteristics of Green Belts that are their openness and their performance. ● Accessibility (Appendix 20) – The area is not served well by public transport, one bus service per hour (Heswall to Chester), an indirect train services from Barnston (1.3 miles away) and Heswall Bus Station (1.4 miles away). ● Highways – the A540 Chester Road is exceptionally busy highway that would be able to safely sustain the influx of 500 plus additional private cars (1,000 movements per day based on a two car family), delivery and services without significant changes to the flow and infrastructure on Chester Road. ● Impact that the development of an addition of 281 house would have on the combined sewer maintained and operated by Welsh Water that runs down Chester Road. ● Loss of high quality farm land and sustainable production of locally sourced products. ● Impact to local broadband speed (Open Reach are the only provider of infrastructure to this area). ● Impact to the local amenity and openness. ● Disruption during the construction phase (highways, deliveries, upgrades of sewerage, provision of services etc.). ● Noise impact during construction. ● Loss of privacy during construction. ● Noise impact during occupation. ● loss of privacy to ourselves. ● Loss of amenity to ourselves. ● Light pollution.</p> <p>We have noted that page 135 and 136 of “Summary of Initial Green Belt Assessment for Public Consultation” has identified SP071 as a site that scores well in terms of potential for development and that if needed could be released from Green Belt with capacity for the construction of 281 dwellings with a proportion (10% as intimated verbally by one of your Forward Planning Team) of these being designated as “Affordable Homes”. Community and Visitors. Site SP071 extends to 28.12 hectares with 15.07 hectares of valuable, prime agricultural land (grade 3a and 3b) and provides a unique aspect as well as rural outlook for the benefit of the local community, users of Chester Road and visitors to the Wirral who are staying at the Premier Inn. The families staying at the Premier Inn can often be seen walking along the road looking at the Alpacas at Gayton Stables and watching the activity on the surrounding farmland. The land includes three naturally formed meres surrounded by native woodland, with two of the meres being rented, stocked and maintained by the Rookery Fishing Club in Irby, although we would add that the heron and wildlife have far more success with the anglers. At night you can often see the Barn owls sitting on the fence post during the day the buzzards circling high above in sky it truly provides a rural setting in close proximity to Heswall. Our property is encompassed by this unique aspect that allows to enjoy extended privacy and tranquillity of being surround on three sides by agricultural land, with one of the woodland enclosed meres and most active in terms of wildlife being immediately behind our property, this has not been included within Appendix 5 – Map of Core Biodiversity Areas.</p> <p><u>Impact to Wildlife.</u> The area is a wonderful natural habitat for England’s indigenous species of trees, wild flowers, wild animals, birds and insects that would be lost forever if the area were to be developed for residential housing. The area supports a significant number of pollinating insects and other wildlife that would be lost due to their natural habitat being irrevocably destroyed. Loss of Valuable Prime Agricultural Land. With the thought that UK could leave the EU next year surely it was within the public interest and one of sustainability to retain as much of the UK’s prime agricultural land and not reduce it. Logically it is pointless to house more people in executive homes if when cannot provide a sustainable means for feeding the population. This is an irreversible process that reduces our farmland and locks us into a nation in terms of reliance on imported products. It increases our carbon footprint and our reliance on imported products. It increases our carbon footprint and our reliance on transported products from other nations when this could be provided from locally grown and sourced produce.</p> <p><u>Environmental Impact Assessment.</u> Through our historical and recent good natured dealings with Wirral Planning Council team we are confident that a full environmental assessment will be required as part of the process and that English Nature would engaged as a consultee prior to the area being considered to be removed from the protection of the Green Belt and certainly a planning consent being granted. Accessibility. Appendix 20 Area of Highest Accessibility, denotes that SP071 is one of the areas of Highest Accessibility, there appears to be no definition for “Highest Accessibility” within the review documentation however for the purpose of this correspondence we have presumed that his means well served in terms of public transport. Although we choose to walk the 1.4 miles to Heswall Bus Station to use public transport to travel to Liverpool, it would be difficult to suggest that the area (SP071) is served well by public transport. The train service from Barnston (1.3 miles from our home) doesn’t have direct links to either Chester or Liverpool and the hourly bus service to Chester (22) was recently nearly lost when Avon went into administration thankfully this service was rescued by Stagecoach however it takes over an hour to travel 12 miles. Therefore, for the sake of convenience we would conclude that the only practicable and viable means of transport and routes of least resistance for the majority of people moving to the development will be by car. Clearly we are aware that the Highways Authority will be engaged in the consultation process as they are statutory consultee however for the completeness, we have the following comments and observations.</p> <p><u>Highways.</u> There will be significant impact from vehicle movements during construction.</p> <p><u>Highway safety/impact to highway long term</u> – if 281 houses were developed on the site then there potentially there could be an additional 562 vehicles to accommodate (in excess of 1,000 vehicle movements per day) on an already very busy road. As it is we struggle to exit our property from 8am onwards and our ability to turn right out of our property is severely limited during the hours of 8am to 6pm. The main issues terms from an uninterrupted flow of southbound and northbound traffic. In particular the southbound traffic from Gayton roundabout that is fed by Barnston, Brimstage and Heswall as these are the main routes that serve to access the M53, Heswall, Irby, West Kirby and Caldy. There are no traffic control measures or lights to interrupt the flow from Barnston or Brimstage and the first set of lights (aside from one set of pedestrian lights) in Heswall are at Heswall Cross. The route not only carries the main flow of traffic commuting to M53, Chester and Deeside but includes all HGV traffic serving the Aldi Distribution site at Neston as their routes were restricted as part of the consent granted for the use of the facility. These issues will need to be considered and addressed to provide a safe and sustainable plan. Beneficially we would hope to expect that the Highway Authority would require the current speed limit on the A540 to be reduced from the current 50mph limit to that of a 30mph one. Clearly this would be an advantage.</p>

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	<p><u>Drainage/Sewerage Considerations.</u> Welsh Water should be consulted as they manage the combined effluent/surface water sewer not United Utilities. United Utilities brings in the potable water and should be consulted for this purpose. The main sewer managed by Welsh Water down Chester Road to the treatment works should have to be upgraded as it backs up on a regular basis with the existing demand. Particularly during a period of heavy rainfall as it is a combined sewer. We have had to install two non-return valves on our drainage systems to prevent the effluent from the main sewer backing up into our property. We experienced this when we first built our house and rectified the situation immediately, however there is localised flooding to Queensway and overflow from the drainage system during these downfalls. Please note that we recover all the rainwater and have no surface water run-off from our site as we have a separate rainwater management system. Careful consideration would have to be given to existing drainage system contained with SHLAA1549 prior to the site being considered suitable for development and the developers' drainage philosophy and management plan reviewed in detail as the area (SHLAA1549) has a high-water table. The ground water is less than 500mm from the surface therefore traditional soak away type systems would not work. We also have a concern as the area currently farmed has numerous land drains that flow to the two naturally formed meres and drainage ditches. In the event that the drainage is severed and the meres removed there is a potential for the water table to rise impacting neighbouring sites as there is low lying clay and aquifers that form the basis for the ground strata.</p> <p><u>Impact on [property](Encompassed by SHLAA1549)</u> In the event that the SHLAA1549 is removed from the Green Belt and a planning application made we will be carefully examining and seeking advice that the impact of the development has on our property and in particular the following:</p> <ul style="list-style-type: none"> • Loss of Privacy – it is surrounded on three sides by SGLAA1549 and we have no neighbouring properties • Loss of amenity – ability for us to enjoy unfettered access to all of our garden area without being overlooked • Noise and disruption on completion of construction • Design of proposed landscape and proposed green areas • Design of the development (layout and density) • Design of lighting and light pollution (there is little if no light pollution to the rear of our property) • Proximity of the nearest developments • Visual amenity • Loss of light or overshadowing • Loss of trees • Mitigation of noise and disruption during construction • Traffic generation during construction • Construction and delivery hours • Highway safety during construction • Traffic generation on completion of construction • Highway safety on completion of construction • Waste management and litter control during construction and wind-blown construction material
DOR00175	<p>We vigorously oppose the atrocious planning proposals for Green Belt development in the Wirral Peninsula with particular reference to Barnston, Thingwall, Heswall and Pensby (SP061, SP062, SP063, SP064 and SP065). All of Wirral Council consultation meetings have been based on one incorrect and misleading assertion which claims that Wirral Borough Council cannot meet the Government's requirements without major incursion into the Green Belt. At the first of the consultation meetings, on the 3rd September at the Town hall, the Assistant Director for Planning and his supporting officers provided residents with incorrect information by claiming that:</p> <ul style="list-style-type: none"> • There is insufficient brown land available • They are unable to force Peel Holdings (who owns a significant area of East Wirral; Wirral Waters) to complete their build of 13,000 houses before 2035. <p>As the meeting and subsequent publicity unfolded, the following evidence has emerged:</p> <ul style="list-style-type: none"> • The Leader of the Council wrote to Wirral residents, again with misleading and incorrect information. • Peel Holdings has written a response to the letter from the Council Leader which confirms that the information given to residents is incorrect and which refutes his claims. • The initial requirement of 13,000 houses is incorrect. • Under green Belt Criterion 1 re urban sprawl, it has emerged that in 2012, the Council agreed settlement areas where, for example, the village of Barnston was joined to Thingwall, Heswall and Pensby. The current proposals will join the villages of Heswall, Barnston, Pensby, Irby and Thingwall together. The Council claimed it has consulted on the establishment of settlement areas but no evidence of this consultation has emerged and local residents have no knowledge of it. • There are many sites on Wirral owned by developers who are sitting on the land and not developing it (and that this can't be taken into the figures). • Leverhulme Trust has expressed concern about the way they are being portrayed by the Council. <p>The evidence to stop these proposals NOW is overwhelmingly powerful as follows:</p> <p><u>The Greenbelt Criteria (NPPF).</u> None of the five criteria are met.</p> <p><u>Environmental Impact Assessment.</u> The priority attached to the protection of agricultural enterprise in AGR1 reflects the continuing important of agriculture to the local economy and the special contribution that agriculture makes to maintaining the character and landscape of Wirral's rural areas. The Bird Conservation Targeting Project (BCTP) produces breeding distribution maps for rare and declining farmland and woodlands birds. The following species are identified in the designated areas: tree sparrow, redshank, grey partridge, lapwing, corn bunting, and bats – a number of varieties.</p> <p><u>Biodiversity.</u> The UDP Topic: Agriculture: AGR1 the Protection of Agriculture Strategic Policy States expresses that in considering proposals for development on agricultural land the local planning authority will seek to prevent:</p> <ul style="list-style-type: none"> • The loss of Wirral's best and most versatile agricultural land. • The severance or fragmentation of farm holding. • Unacceptable nuisance or disturbance to exiting agricultural enterprise. <p>Where development on the best and most versatile agricultural land is unavoidable such development should be directed to the lowest possible grade. WHY?</p> <ul style="list-style-type: none"> • Data proves that agriculture is still of considerable significance in terms of its impact on the economy of Wirral. • Policy AGR1 emphasises that national planning policy places upon sustaining the rural economy and protecting the countryside. All Wirral's rural areas fall within the Green Belt. • In Wirral over half of the land used for agricultural is classified within the ministry of Agriculture, Fisheries and Food (MAFF). Land of this quality is of national important which should normally be protected from development. • AGR1 seeks to protect the land of poorer quality to protect parcels of land incapable of future agricultural use due to fragmentation. • Adjacent development disturbance can have operational implications for cropping patterns and livestock husbandry. The Secretary of State's Strategic Guidance for Merseyside specifically states that development allowed near farms needs to be such as to avoid incompatible land use. <p><u>TRANSPORT.</u> Barnston, Thingwall, Heswall and Pensby, situated on Deeside, are served by limited exit routes to Chester and Liverpool. All residents on Deeside have exit by travelling through the Merseyside urban area to reach either of the two Mersey tunnels to Liverpool (one in Birkenhead and one in Wallasey) or the foot ferry. People living West of the M53 (Barnston, Thingwall, Heswall</p>

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	<p>and Pensby) are in effect, landlocked – one way in and one way out. However, on the Merseyside aspect of the Peninsula, where there is significant brown belt land available, additional, closer options to Liverpool are available.</p> <p>To consider developing SP061-065 is flawed by unacceptable infrastructure and health and safety problems. Should these proposals go ahead, this would be the impact on roads: ● There is factual evidence to identify the additional cars on the roads in areas SP061, SP062 and SP063 with range of 1653-2486 using the Transport National Travel Survey and RAC forecast. ● The A551 has been designated an accident alert route with fatalities over recent years. ● Due to the fact that Barnston Village has four farms and lanes and road structures on commuter routes that cause congestion and danger on a daily basis now. ● On several roads, within the space of a less than half a mile, speed restrictions range from 20mph to 30mph to 40mph to 30mph to 20mph. ● Traffic counts show high density on the commuter routes through the lanes. ● The A551 is the main route for emergency vehicles to the main A and E hospital (Arrowe Park – also in West Wirral) that serves the whole of Wirral. ● The A551 is a commuter route to Liverpool via Junction 3 of the M53. ● Buses are available to Liverpool from Heswall via the A450 and as a consequence, commuters are already turning the A450 into a car park where their cars are left all day. ● There is no direct train link to Liverpool from Heswall Hills Station. ● Commuters already face long queues at peak times to get to the motorway.</p> <p><u>Drainage And Sewage.</u> ● Barnston Dale (served by the A450) was formed in the Ice Age and is a steep U-shaped valley. ● The stream in the valley and its unnamed tributaries drain most of Central Wirral. ● The present bridge was built in 1875 ● The Dale is an ancient woodland with 3 sites of biological importance. ● A sewer was constructed in c1900 which was enlarged in the 1960s ● The streams drain half of SP062, all of SP061 and also Thingwall. ● United Utilities were required to undertake repairs to sink hole (some 3 ft. deep) in 2015 following intervention by Esther McVey. ● Discharges from Thingwall Reservoir (opened in 1918) have caused major erosion. ● The flow from the reservoir was found to have major construction defects in 2017, and, as a result, the weir (constructed to stop erosion) has been rendered useless. ● The sewer from the treatment plant at Barnston Storm Tanks overflows into stream and is regarded locally as a serious health risk. ● The sewer is near full capacity due to other branches joining it within the designated areas. ● The A551 already floods by the entrance to the Dale ● Should high tides and heavy rain combine, serious flooding occurs. ● Brimstage Brook (SP062) is liable to flooding ● Lorries attempting to reach the M53 via A5137 regularly get stuck under 2 low bridges with Broad under one always flooding in heavy rains when the road is then closed. ● The field alongside A551 regularly floods. Should these proposals go ahead there would be further impact on drainage and sewage which is currently affected by the following: ○ There is lack of maintenance/inspection of the steam for blockage; ○ There is lack of the inspection of the sewer; ○ Inspection shafts erode into the stream; ○ There is excessive discharge into one of the streams; ○ Sewage related discharge is evident into Prenton Brook; ○ There would be increased likelihood of flooding; ○ Rich ancient hedgerows that form valuable wildlife corridors would be decimated; ○ Wildlife, currently preserved in the Dale including badgers sets would be stranded; ○ Brimstage Brook (westerly SP062) would be subject to further flooding; ○ The reservoir which apparently in an emergency would need to be emptied, is adjacent to a proposed new development of 504 houses.</p> <p><u>Schools.</u> All of the primary schools in the designated area are full to capacity in some or all year groups in F2 and KS1 i.e. where schools cannot exceed classes of 30 for children below the age of 7 years. Where schools can accept over 30 in a class in Key Stage 2, the schools have had to accept pupils over the net capacity calculation. Ref.: the latest Local Authority published dated (2017) It is acknowledged that the numbers vary year on year but traditionally these schools reflect the birth rate. When the birth rate is normal or high, the schools are well over-subscribed. Should these proposals go ahead, there would be further impact on the limited capacity of these schools and admission of further pupils would prejudice the education of all pupils.</p> <p><u>Historical Significance.</u> The areas indicated by SP061, SP062 and SP063 would fall with the HER designation. ● Only c7348 has. of the HLC type fall into this category across Cheshire. There are approximately 16 hectares of Town Field in Barnston; ● The field systems have the potential to contain rich habitats; archaeological remains and historic artefacts. NB Pingvoller – Ancient Norse Assembly Ground: Thingwall; and ● In addition, there is the potential of ridges and furrow to be discovered as well as earthworks e.g. HER2 ANCIENT FIELD SYSTEMS. These field systems are largely characterised by irregular and semi-irregular field patterns associated with a network of winding paths, tracks and lanes serving hamlets and villages. Other facts in addition to the above are: ● There is very little employment in Wirra, other than the service industries, as people work in Liverpool, Manchester and Chester. ● Young people leave the Wirral to seek work; ● Wirral has an ageing, declining population; ● The Green Belt is enjoyed by ALL Wirral residents – accessible due to the size of the Borough; and ● The landowners are demonstrating disregard for viable farms by not renewing tenancies. When asked at the first consultation meeting what would happen if a wealthy resident bought some of the proposed land for development and they didn't develop it out of choice, the planning officer, [council officer] said that this has happened all over Wirral and nothing could be done.</p> <p>When asked how then, in releasing Green Belt to developers, could the Council be sure to meet the Government target, the answer was that it couldn't. So the Green Belt status could be lost for no useful purpose whatsoever and Wirral Council is prepared to take that risk rather than have a realistic approach to the development of Brownfield sites.</p> <p>In conclusion, something needs to be done regarding the special circumstances that Wirral is places in, which the Council is studiously ignoring. We have nothing to gain by this madness as the decay in some shockingly poor areas of East Wirral remains unaddressed. It is a commonly held view that Wirral Council is disregarding the opportunity to upgrade run down areas and at the price of savaging the beauty and unique qualities of the Green Belt, something which benefits all who lives in Wirral. The process of consultation has been flawed from beginning to end which renders any decisions made based on this, unlawful.</p>
DOR00176	I wish to object to your proposals to reclassify huge areas of the Green Belt. The Green Belt is one of the key factors that make the Wirral so special and to go ahead with your plans would create a huge urban sprawl spreading out from Birkenhead to the Dee. Thus going directly against four of the key purposes that the Government has set down for the existence of the Green Belt. Your plans

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	<p>would not:</p> <ul style="list-style-type: none"> • Check the unrestricted sprawl of large built-up areas from the north and east of the Wirral; • Prevent neighbouring towns merging i.e. Irby, Pensby, Thingwall, Barnston and Heswall; • Safeguard the countryside from encroachment; and • Preserve the setting and character of historic towns. <p>It seems completely wrong to build on Green Belt when there are so many brownfield sites, when large areas of the Wirral are in desperate need of regeneration and when there is anything from 4,000 to 6,000 empty homes on the Wirral. I read in the local press that Peel Holdings, in Wirral Waters, are more than willing to meet much of the housing needs of the Wirral over the next 15 to 30 years. There appears to be a breakdown in communication and possibly cooperation between Peel Holdings and Wirral Council. This needs to be resolved if Wirral is to preserve its special character and to regenerate run down areas of Wirral. It also seems wrong, if not immoral, to build on Green Belt land when more needs to be done to prevent climate change by protecting green spaces. Particularly land that is valuable farmland supplying food to local consumers.</p> <p>With regard to the number of homes I am pleased to read that the Council is challenging the figure in the light of revised ONS figures. The original figure of 12,000 new homes over the next 15 years, even to a lay person, seemed completely ridiculous. The population of the Wirral is fairly static and Brexit will have a negative economic impact on our area, even the Government admits that areas like the North will take a hit. We could even see a decline in population as people are forced to move to look for work.</p> <p>With particular reference to the area I live in, Barnston (Plots SPO61 to SPO65), my concerns focus on the following aspects:</p> <ul style="list-style-type: none"> • The road infrastructure: Barnston Road and Brimstage Road already struggle to cope with the volume of traffic that use them at the moment. Should the proposed 2000+ homes be built bringing with it an increased number of cars to the area there will be major problems. Barnston Road is classified as an accident route and it is impossible to widen the road in the Conservation Area. Whitehouse Lane and Acre Lane have already become 'rat runs' from Barnston Road to Brimstage Road and the motorway. Cars cut through to and from Barnston Road and Pensby Road via Milner Road/Whitfield Lane. Again, these roads are totally unsuitable for heavy traffic. Whilst Milner Road could possibly be widened it just leads into the bottleneck of Whitfield Lane. I can envisage gridlock in the area, increased accidents, major difficulty for emergency vehicles to navigate their way through the area and increased pollution. Not helped by the poor public transport links (bus and train) that serve the area. • Farmland: There are 4 farms in this area. Farms that supply food to the local community and as businesses bring in wealth to the area. They also protect and preserve the environment, wildlife and footpaths. Plots SPO61 to SPO65 threaten to break up farms leaving what is left of the farm economically unviable. Leading to the inevitable conclusion that what is left of the farm will eventually be built on thus further decimating the Green Belt. • Schools: Is the Council prepared to spend money on enlarging school buildings/building new schools? The existing schools in the area are already operating at capacity. • Drainage/Sewage: Is the council prepared to spend money improving an already failing system? Barnston Dale frequently floods and the sewer system for the area is full to capacity and frequently leaks. Evidence of this is well documented by the Barnston Conservation Society. The effect of building 2000+ homes in the area would lead to serious flooding, environmental and health issues. Has the Council carried out surveys of the land in the area to evaluate these threats? • The impact on the Conservation Area: Building on Plots SPO061-SPO065 threatens the very special nature of the Conservation Area. It is an historic area, mentioned in the Domesday Book. To surround it with housing would destroy 'the setting and special character of an historic town'. <p>I would ask the Council to reconsider its plans for the Green Belt. Once the green Belt is gone it is gone forever. Is this the legacy we wish to leave our children?</p>
DOR00177	<p>I/We live within the boundary of the Saughall Massie Village Conservation Area society which is surrounded by green belt which separates our Conservation Area from the urban sprawl of Moreton. Removing adjacent farmland from Green Belt protection will inevitably expose that land to urban infill development. The principal reason for conserving Saughall Massie Village has been to protect its semi-rural character, which includes farms, an equestrian centre and many listed farming and non-farming related buildings and structures.</p> <p>The Green Belt fields surrounding our village are an integral part aspect of conserving the village character. If Green Belt protection is removed then development is certain. Absentee landlords have already sold options to developers should planning be made easier through removing local fields from Green Belt protection. Without the fields, the farms and their buildings will cease to be economically viable, and the semi-rural aspect of the conservation area will collapse. This would be a complete breach of the founding principles established by WMBC when the Conservation Area Society was first established. Most importantly the largest field in Saughall Massie, earmarked for potential development sits on the flood plain of the Arrow Brook. That field area is a critical run off area at the moment of high water. If it was protected from flowing, water would likely flood the adjacent housing estate on the opposite bank.</p> <p>On the wide principle of addressing housing need and identifying appropriate building land we would ask you to consider the following: ● The Office of National Statistics has reduced our projected housing need for Wirral from 800 new builds per annum to only 449. It seems likely that Westminster will reduce the WMBC new build requirement. ● A Sky News national housing survey indicated that the numerical supply of houses in Wirral is high, and more than adequate to satisfy demand. However, it identifies the poor quality of private rented housing in areas such as Birkenhead as the</p>

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	<p>primary housing problem, not the absence of new build in Green Belt areas. ● The Development Director of Peel Holdings confirms they can build 1500 new units by 2022 and 6450 by 2033 with an ultimate goal of 13,000 new homes on the brown field Birkenhead sites of Wirral Waters. ● The short term Wirral housing need is the improvement of private rented accommodation in areas such as Birkenhead, Ne Brighton, Egremont, Rock Ferry, New Ferry, Transmere. The need isn't in Green Belt areas. Those in most need could not afford to buy the houses that would be built on the proposed green Belt area sites. ● Until recently Wirral planning policy was to disallow any housing development west of the M53, which encompasses the greater part of Wirral's Green Belt. the Council at that point having reviewed housing requirements, clearly felt that housing needs could be accommodated by developing brown field sites on the eastern side of the M53. What has changed?</p> <p>Conclusion There are many unexploited brown field sites east of the M53 and some west of it, which have been offered up as potential development. Wirral Waters is the major site. In view of the lower ONC new-build target it seems perfectly possible, as the Labour of WMBC has admitted that "no incursion in the Green Belt might be required". Given the locality of those who are in most housing need, wouldn't he be better employed developing these areas rather than the Green Belt? We hope that WMBC aren't using the Local Plan consultation process as a prelude to reviewing the Green Belt boundaries anyway. Could it be that financial reasons are driving the review of Green Belt boundaries, not housing need? Are anticipated budgetary pressures encouraging higher value house building in the Green Belt that will generate additional council tax revenue? Whilst Green Belt can be built on if 'special circumstance' can be proved, and dire housing need might be such a circumstance, subsidising future budget overspend by WMBC certainly isn't. As per our conservation constitution, we seek to conserve the semi-rural aspect of Saughall Massie Village and can't see any pressing imperative to revise the protection of our green spaces by redrawing the boundaries of our local or indeed the wider Wirral Green Belt. The current urgency in addressing the compilation of a WMBC Local Plan has caused unnecessary public concern. It would have been handled in a more measured way if WMBC had not been negligent in not compiling this plan sooner. Other Councils started and finished this process 13 years ago! We the undersigned wish to raise our objections to the removal of Green Belt protection in the adjacent areas of Saughall Massie Village.</p>
DOR00178	same as above (DOR00177)
DOR00179	<p>We object to the current proposals in the Wirral Local Plan – Development Options Review. In particular those involving unwarranted intrusion into the open green spaces surrounding West Kirby, Caldy, Heswall and Greasby/Saughall Massey. These proposals give the impression of being poorly thought out and biased against brown land development; favouring development in open green spaces. These spaces are the lung of Merseyside and a playground for those in Merseyside. This seems to be the taking of an advantage of a Government decree to cause unwarranted intrusion into the Green Belt Area. As such it is my submission that these proposals are challengeable at law. The last thing anyone wants is to see these proposals hung up for many years in legal challenge with the blight that that brings. Although the current proposal is the product of a Government decree there is no proven need for development of this type in this area. Furthermore, if there were shown to be any need the need is not in the area proposed and certainly not of the type of the current developments. The proposals are therefore challengeable on need grounds alone. The proposed area is without the required infrastructure with reference to roads. This makes the proposal unjustified because of inability to persuade people onto public transport as opposed to reliance upon self-transport. Drainage and water infrastructure would be unable to cope with the influx currently proposed. No infrastructure proposals are put forward. The construction of such infrastructure is without design and how this will be provided is unplanned and un-costed. It will bring chaos to the area for a very substantial period and as such is unwarranted. An example is of the 300-home village proposed at Pikes Hey Road, Caldy. The only two exits from such village would be on to a small country lane or onto an A-Road already boasting signs as to be an accident blackspot. Three hundred houses will produce something in the region of three thousand six hundred vehicle movements a day on to those roads which on any basis are inadequate to cope. These issues would be replicated at each junction as the traffic moves away from the area. The schooling in the area will be unable to cope with such a large influx of people which will cast an unwarranted burden upon the local authority to create new schools quickly in the area at a time when financial resources are stretched and inadequate. Similarly doctors and dentists will become overstretched; at a time the NHS resources are severely stretched and at a time it is proving difficult to attract people into General Practice. The current generation is only the guardian of the open spaces and the flora and fauna of the area for the period of their life time. Once destroyed it has gone for ever and can never be replicated. It is lost to all generations to come who will never know that green and open space. In short to act in such a manner in an area already the subject of large tracts of concrete is little short of vandalism particularly when no one can speak for the fauna and flora of the areas chosen. There is stark conflict drawn between the areas chosen and other potential development sites in or around the chosen areas; where the chosen areas are permitted for development, but smaller isolated sites are not and there is no indication as to how this conflict will be resolved. There are other more relevant sites; particularly of brown land. It is suggested that these sites are in the ownership of a wealthy private conglomerate which is not prepared to release these sites. It is noted that apparently that company is in discussion over purchase of other valuable developments out of area. If it really is that conglomerates stated position not to allow development of those sites, then they ought to be the subject of compulsory purchase. Furthermore, such a company ought to look at its own ethos if it is forcing a local authority into pouring concrete into green and open spaces in preference to providing a small part of its land bank consisting of brown land into redevelopment and regeneration. The areas proposed for construction are a playground and are enjoyed by many within and indeed without Merseyside and is, in effect the lung of Merseyside. This benefit will be lost forever if concrete is poured into these open spaces. There will be no benefit other than to one or two wealthy landowners and many in the community will lose their playground. We would ask that these points be duly considered.</p>
DOR00180	As a resident of the Conservation Area of Thornton Hough I would like to register my strong opposition to the release of any Green Belt land in and immediately surrounding our village and also more broadly across Wirral. I understand the necessity for more available homes within Wirral both currently and over the coming years. It does appear to be clear however that based upon recent figures

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	<p>from the Office of National Statistics, the area's projected population growth provided by Council and thus the need for housing, are very much greater than the reality. I also understand that Peel Holdings dispute the level suggested by the Council and additionally that their multiple Planning Applications for the Wirral Waters scheme are still awaiting review from March 2018 (information accurate September 2018). In addition there are many brown field sites and empty properties available within the Borough whose viability should be reviewed before considering eating into the valuable Green Belt that Wirral is so admired for. Regeneration of these areas would also add positively to the environment for those already living there. Such an approach has been very well demonstrated in Liverpool where areas that had been allowed to become "run-down" have been re-developed with a broad mixture of available home types and communities are being re-established. The inner city areas around Dingle, Great Homer Street and Chinatown strongly demonstrate this success. Thornton Hough: 1. The Conservation Area Appraisal and Management Plan of 2007 illustrates clearly the high standard of care and continuity for the fabric of the village. It also highlights the importance of Landscapes and Vistas (3.0) and the Green Space within the whole village. I understand that the recommendation of Council 2009 (Wirral.org) was to adopt this review to inform the evidence base of future planning. 2. Development of the land offered by Leverhulme Estates for consideration would severely impact the current status of the village. Its' layout is sensitive to expansion and would reduce its distinctiveness. The current population is relatively small, just 770 in 2001 census, and one must assume limited growth in subsequent years. Any residential development would have immediate implications upon the infrastructure with additional roads, increased traffic levels as a minimum and therefore would undoubtedly alter the fabric of the village. 3. Finally and very importantly, more than ever this country needs to preserve its' agricultural land for the future. We need to be able to produce our own food supply wherever possible. On the precious farmland in and around the village, Lord Leverhulme's agricultural village, crops are grown and dairy cattle graze on the feed grown here. It is imperative that this legacy is protected. Thank you for considering my views and I do hope that they will help to inform the Councils decision toward the protection of our Green Belt.</p>
DOR00181	<p>Bromborough U3A is one of over 1000 groups in the country, 6 of which are on the Wirral. All of them need a large hall to accommodate their members. We have met in Bromborough Civic Centre for 20 years. I have listed below some of the questions I would like to ask you as well as the reason for our protest. 1. Who owns the land of SHLAA2024? 2. How can the Council afford to destroy such a well-built and useful building? 3. How will the Council replace the largest hall in the area? Where would we go in this area for our meetings? Our members average the age of 70+ and many do not have their own transport. They walk, take a bus or accept lifts. Bus routes to Bebington or Eastham have recently been reduced or cancelled. 4. Ours, although the biggest, is not the only group to rely on the two halls. These are yoga classes, line-dancing, Zumba, RSPB meet there and Slimmer's world. There are attic sales and the occasional lecture. It is the community centre for Bromborough. How could any sane and sensible Council remove such a facility? 5. It is so conveniently placed in the centre of the Village, and so well-designed with a kitchen between the two halls. It is the heart of Bromborough. I am writing on behalf of Bromborough U3A (University of the Third Age) , as its previous chairman, to protest at the possibility of the re-use of Bromborough Car park. I am also writing on behalf of the many people who use that car park frequently. I have listed below some of the questions I would like to ask you as well as the reason for my/our protest. 1. Who owns the land of SHLAA2025? 2. What would happen to the Co-op and its car park? This is the only large store in the Village and even more people would be forced to go the Croft Retail Park. Bad news for Bromborough. 3. Where will people park their cars when they come to Bromborough? The roads are already full of parked cars. 4. Why would they come into Bromborough? If you can't park you go elsewhere. Take away the car park and you stop people going into the Village. 5. Imagine what would happen to Bebington or Heswall if their car parks were taken to be built on. Please be aware that Bromborough still exists as a village and no one wants it to lose its character [Petition attached]</p>
DOR00182	<p>We would like to state our objections to the Green Belt area near our property being designated part of the infill plan for development on the following grounds: 1. We have lived at our property for 48 years and this is the first time that the area surrounding Oxford, Eton and Radley Drives has been brought to our attention as being a potential infill area. We always understood that the fields adjacent to Eton Drive was prime agriculture lands and as such would not be built upon. We are horrified at the thought of these fields being built upon. 2. In the summary of the Green Belt review these fields have been identified as being of "good quality" with a strategy of "conserve". Any major changes would impact and reduce the local distinctiveness of our village of Thornton Hough with its many listed buildings. In our opinion it is not suitable for being released from the Green Belt. 3. With Brexit looming on the horizon it is imperative that agricultural land be maintained at the status quo so that we as a nation can be as self-sufficient as possible and less reliant on the EEC countries for our everyday needs. Using such "good quality" agricultural land for building is plainly not in the best interest of Britain. Clearly the council needs to be forward thinking and give real consideration to what will happen in the future. 4. Enlarging the estate would be in itself bring hazards and danger to the residents of our small village through extra traffic. We have very little public transport serving this community. Only one bus route comes through Thornton Hough. Consequently new residents would need to have their own transport thus compounding road safety issues. 5. Extending the estate onto the fields adjacent to Eton Drive would almost certainly have a detrimental effect on the value of our property and our neighbours' properties, through diminishing the openness of its surroundings. 6. In the light of recent figures released by the Office of National Statistics it is clear that dwelling requirements in Wirral should be downgraded and we look to the Council to undertake a review of their plans and inform the Wirral Residents of such changes. 7. It has been brought to our attention that Wirral has sufficient land available for meeting the requirements of approx.. 7000 units through the development at Wirral Waters, brownfield sites and existing empty properties without the need for building on Green Belt land. 8. Consideration should also be given to protecting the wildlife in the neighbourhood. Extending not only the estate here but also in the Green Belt in general, would have a detrimental effect on their habitat, reducing the trees and undergrowth which is so vital for the birds, insects and the small native animals. Our Council should be proactive in their planning and think about the effect of decisions made now which could have disastrous consequences in the future. We look forward to receiving confirmation of new figures being adopted by the Council and changes being made to their Local Plan.</p>

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DOR00183	<p>Following the IPCC conference in Seoul, the last thing any Council should be planning to do in in preparing their local plan which covers the next 15 years is getting rid of trees, hedgerows or indeed any green spaces. This is especially significant in the case of Wirral Council as 43% of the borough is built on – more than 7 times the national average. Any move to build further on the little remaining undeveloped land would be an act of environmental vandalism and leave the council open to future legal challenge, not to mention ridicule. It is encouraging that the council says it is challenging the figure of 12,000 new homes (800 per year for 15 years) as this is clearly not a credible figure. Recently revised ONS forecasts should yield a more sensible figure. As well as finding the overall concept of the Local Plan unrealistic, I have very strong objections to the proposals in so far as they impact on Barnston i.e. SP061-065.</p> <p>My main concerns are:</p> <ol style="list-style-type: none"> 1. Environmental Impact Assessment. I understand that the Council has carried out no impact assessments on the environmental impact on releasing the parcels of land identified in and around Barnston from the greenbelt. 2. Agriculture. The parcels of land you have identified in Barnston area are currently farmed which, while enhancing the landscape, more significantly they contribute to Wirral's economy. Provision of food, important as it is now, will take on far greater significance once we leave the EU. Much of the Barnston farming is of high quality – we can ill afford to lose such farming. 3. Infrastructure <ol style="list-style-type: none"> a. Roads. Barnston Road has already been identified by WBC as inadequate for certain classes of HGV. Where the road goes through the conservation area, by the Fox and hounds, it is so narrow that 2 cars cannot pass safely if one of them is larger than a normal family car. In the case of Storeton Lane (where it joins Barnston Road) it is wide enough for just one vehicle. These pinch points plus current volumes of traffic already cause congestion. Adding thousands more vehicles would be foolish in the extreme. Emergency vehicles e.g. ambulances heading to Arrow Park hospital, which currently find this situation difficult would find it nigh on impossible, with the inevitable increased risk. Public transport does not help as it is poor. Trains to Liverpool are only every hour with a change at Bidston. The car par at Heswall is small and the bus service is not much better. b. Sewers. The sewers in Barnston are at or near their maximum handling capability. Residents have reported raw sewage escaping into the stream running through the Dale – a serious health risk. This currently very old system (one is 120 years old, the other 70 years old) could not cope with waste from more dwellings. c. Public Health Services. Your plan could see in excess of 2,200 new homes being built in and around the Barnston area. The pressure this additional 5,000 (approx..) people (assuming 2.2. people /dwelling) would put on local doctors' surgeries, dental surgeries and Arrow Park hospital would be unsustainable. d. Schools. All of the primary schools servicing this area are now at or near capacity. All the above could, no doubt, be addressed by building new roads, drains, sewers, hospitals, doctors and dental surgeries and schools – but at what cost? 4. Flooding. There is already a significant risk in Barnston. Brimstage Brook floods as does Barnston Road south of the Church. Concreting over many acres of farmland will greatly exacerbate this risk. 5. Conservation Area. Barnston is a conservation area which brings additional responsibilities for WBC. Your policies should work for the preservation and enhancement of the area and not its detriment. What you are proposing is the exact opposite of your responsibilities as it will lead to the conservation area being swallowed up in urban sprawl. 6. History. The village of Barnston is in the Domesday Book and the area surrounding it has many ancient field systems and sites of archaeological interest. 7. Ecology. Many rare and endangered species of birds have been seen in the parcels of land around Barnston that you propose developing. There are also badgers and many ancient hedgerows. The Council wishes to promote Wirral as a leisure destination and wants to attract more tourists – witness your proposed golf resort. Much of Wirral's appeal is its open spaces. Decimating the Green Belt will not only decimate the quality of life for Wirral's residents it will kill it as a tourist destination. Instead of looking for the easy option – developers must be queueing up to snap up the green field sites you wish to remove from the Green Belt. <p>The Council should be:</p> <ol style="list-style-type: none"> a. Vigorously challenging the 12,000 homes figure; b. Working very closely with Peel Holdings to maximise the number of units they can deliver; c. Identifying the brownfield sites to build the type of home Peel will not be providing.²⁷ attached] <p>The figures you have used to arrive at this total of 12,000 new homes are questionable. You are projecting substantial jobs growth at a time when the latest government forecasts are showing a negative growth scenario post Brexit of between -2.5% and -12%. How secure do we think Vauxhall Ellesmere Port will be after Brexit? As for population growth, the population of the Wirral has hardly changed over the last 15 years yet you are projecting substantial growth over the next 15. Why? How? Even within your own figures there is such a wide range from low to high within each category and you appear to have opted for the high end. Quite frankly, Phil, these figures make absolutely no sense. Andy Burnham in Manchester has taken the common sense decision to review his figures in light of lower than anticipated growth in order to achieve "a substantial reduction in the loss of greenbelt". You have every right to order a similar review of your figures - in fact you have a duty to do so.</p>

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DOR00184	<p>Being unable to download the relevant documents, I viewed the copies at Heswall Library. You will be aware that there are 10 volumes in all, amounting to over 1,000 pages. There are also appendices and maps, all of which have to be studied in depth in order to appreciate the complexities of the issues before us. Most of the documents were published in September 2018. It is unlikely that many Wirral residents have the time to study these documents in order to make a considered reply within the time allowed for this consultation process. Wirral Council might be complying with the letter but certainly not the spirit of the law which insists that residents be informed about, and consulted on policy changes which might affect their local environment. While I understand the nation's need to build more homes and accept that Wirral must make a contribution to this programme, having read the documents available, I do not accept the inevitability that Green Belt Land must or should be used for this purpose. There appears to be some confusion as to the number of houses which Wirral is required to build between now and 2035 but, in his letter to Wirral residents of August 2018, Cllr inform us "Government ministers have set a housing need targets of Wirral of 800 new homes each year for the lifetime of the plan. This means we must identify enough land available for at least 12,000 homes to be built in Wirral by 2035". Although I understand, it is policy of the Council to use brownfield and urban sites for this housing development I am unable to discover just how many homes might be built on such land. Leader Council's letter doesn't make this clear. However, he does indicate that, potentially, 13,000 new homes might be built on the Wirral Water site. His suggestion that Peel Group has reneged on a promise given in 2010 and is now undertaking to build 2,400 homes is disputed by the Development Director of Wirral Waters. In his letter to the Leader of 10 September 2018, He writes "with the support and cooperation of you and the Council you lead, we could build up to 6,450 (homes) in the next 15 years to reach our ultimate goal of 13,000 homes. The figures we have provided have been grossly misrepresented in your letter to local residents. he continues: Your actions do nothing to encourage much needed outside investment into Birkenhead and put potential funding from public and private sectors in jeopardy. Given the way you have conducted yourself in recent months, and the very misleading public statements you have made, we ask that you stop this campaign of misinformation, be honest with the people of Wirral and correct the misleading information you are distributing. The Council, it appears to me, should strive to improve its relationship with Peel Group with a view encouraging further building to take place with the next 15 years. It should also issue a statement to residents to correct the misleading information which has previously been distributed. In any event, the fact that 13,000 homes might be built at the Wirral Waters development is a clear and indisputable indication that there is indeed sufficient brownfield land available in Wirral to meet its housing needs. I have been unable to find a definitive figure for the number of currently unoccupied homes in Wirral although I know that the Council is taking steps to re-utilise such properties. I urge the Council to continue with this process which should lead to a reduction in its housing shortfall. Consequently it is clear there is no need for Wirral to consider re-designating green belt land and making it available to property developers and speculators.</p> <p>Paragraph 6.4 states: Land to the west of Wirral Way has not be included because of the role of the Wirral Way in defining a clear physical edge to the existing urban area and the constraints associated with the national and international designation of the Dee coastline. In this letter, Council Leader writes "A local plan shapes the policies which guide and determine how a borough like Wirral can be developed and if done properly, can protect the character of historic towns, help prevent urban sprawl and safeguard the countryside". The document, summary of Initial Green Belt Assessment (September 2018) makes fascinating reading. It refers specifically to parcels of land (SP096 to SP106) to the west of the Wirral Way in the area of Lower Heswall. In each case, under Commentary and Summary of Potential, the land is shown as Not Suitable for release from the Green Belt. However each is potentially identified as a new Infill Village in the Green Belt and, in some instances an indication is given as to the number of properties which might be built for example: SP097 – Dee Coast (South of Broad Lane) possible new Infill Village ...which could provide additional capacity of up to 98 dwellings. SP099, SP100 and SP101 which taken together cover Dee Coast (Park West to Seabank road) 117 dwellings. SP104 – Dee Coast (South of Riverbank road) 45 dwellings. I understand that such Infill Villages might be built within Green Belt without first re-designating the land. This appears to be a convenient way of circumventing difficult procedures which might involve further public consultation. However, allowing for the development of this land in Lower Heswall would lead to urban sprawl and certainly does not constitute infill as there are currently few if any properties in this area. For example, on the west of Davenport Road and the top of Riverbank Road, which incidentally are a part of the Wirral Way, there are currently four Victorian semi-detached houses near the corner with Park West and a small bungalow between the top of Seabank Road and the point where Riverbank Road turns towards the shore. Apart from these, Wirral Way users have an uninterrupted view of the river and the Welsh coastline beyond. The land to the left of Riverbank Road as it turns right towards the River Dee is undeveloped agricultural land is designated as Green Belt and borders the Wirral Way. If all the proposed Infill Villages are built, a total of 255 dwellings, the land to the west of the Wirral Way in Lower Heswall will become one large housing development. I am informed that some of this land, previously belonging to McDermott of Meols, was bought by a property developer before the publication of Wirral's documents in September 2018. I imagine the developer was given some encouragement to believe that the land would soon become available for development and this suggests that the Council has already reached a decision about the building of Infill Villages. I must urge the Council to resist all Infill Village proposals in this area for, I believe, if only one small development is allowed, a precedent will be set and future applications for building will be difficult if not impossible to reject. This will lead to a situation which is counter to Wirral's current policies on maintaining the Green Belt's open and undeveloped nature of the area to the west of the Wirral Way. I have particular concerns about my own and neighbouring properties towards the bottom of Seabank Road. For many years it was evident that the main drain taking waste water and sewage towards the treatment works in Target Road was not effective. There were occasions when the smell from the drain at the end of the road was most unpleasant. You will be aware that Welsh Water has undertaken a major building project and installed a storm drain in the land on the north side of Riverbank Road. This work has led to improvement but there are still occasions when the drain at the bottom of Seabank road has to be attended and cleaned out to prevent flooding and the unmistakable smell of sewage.</p>

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DOR00185	<p>I am writing in response to the letter sent to us regarding the potential to build on land close to Oxford Drive, Thornton Hough, which we strongly oppose. The estate is surrounded on three sides by agriculture land and the B5136 on the fourth side and to build on this area would greatly impact agricultural land and affect the openness of the green belt. In summary of Initial Green Belt Review it is stated that “the area is part of the Thornton Hough Rural Farmland landscape character area where the quality and condition of the landscape is good and the landscape strategy for the character area is ‘conserve’. This character area is sensitive to any changes which would reduce the local distinctiveness of villages or increase the prominence of roads or urban edges”. It is therefore not suitable for release from greenbelt, or to be built on. It is imperative that the unique character of Thornton Hough is retained for all to enjoy. It is clear now that the dwelling requirements in Wirral for the next 15 years should be downgraded due to the recent figures released by the ONS and in light of this new information can the Council give an undertaking that Green Belt boundaries will not be redrawn. We have been informed that the development at Wirral Waters, along with brownfield site availability and the 4000-6000 empty units that exist that could be brought back into habitable use will more than suffice the requirement of 7320 units over the 15 year period.</p>
DOR00186	<p>I am horrified and angry that despite clear significant reduction in the forecast need for new houses in the Wirral, you plough on with plans to build on Green Belt land between the Wirral Way and the coast. This time the plan has assumed the guise of “infill” sites and “infill” villages without any meaningful definition. The need for green belt remains the same: a. Provide essential open space for residents and visitors, b. Essential to fighting pollution, c. Essential visual d. Provide open space between urban areas e. Provide habitat for wildlife amenity. Often prime agricultural land The arguments for Green Belt are overwhelming. The area to the West of the Wirral Way forms part of the Dee Coastal strip which has always been accepted, as essential green Belt. The use of the term “infill” is not defined and to the best of my knowledge has never been used to refer to any part of the Coastal strip. All this land is Green Belt and if a parcel called “in fill” or anything else you may wish to call it, it still remains Green Belt and is not a vehicle for development by the back door. Turning a single parcel into a housing estate will destroy the Green belt with its all its benefits. Calling a parcel of Green Belt land, “infill” will not make it easier to get permission for housing development.</p> <p>The rules for seeking development permission of infill sites, set out in your own documentation are as follows:</p> <ol style="list-style-type: none"> 1. There should always be a presumption against approving development 2. Approval should only be agreed in exceptional circumstances 3. Any proposal must be based on benefits which are fully evidenced and justified 4. Any proposal must demonstrate that the existing openness must be maintained 5. Any proposal must demonstrate that the development proposal cannot be met by alternative means. In this case there is ample brown field site capacity to meet the forecast housing need. <p>The case for so called “in fill” development would fail all the Council’s own conditions. The government has not lost interest in maintenance of the Green Belt. Their priority is to develop Green Belt sites to help counter pollution and to encourage local agriculture to counter the impact of Brexit on our food supply.</p> <p>There is no case for development on Green Belt sites, including so called infill parcels. All reference to development on Green Belt land should be removed from the local plan since it will never be a realistic option during the period covered by the plan. While it remains as an apparently credible option, developers will continue to make bids for planning permission until one way or another they succeed. I understand that already at least one parcel of Green Belt land has recently been sold to a developer. The developer clearly thinks that planning permission will follow at some point.</p>
DOR00187	<p>My initial comments relate to the methodology which was applied in identifying these sites in preference to the many other sites that were proposed by landowners and developers in response to the Councils call for sites exercise. I responded to the consultation exercise regarding this methodology on 5th December 2017 detailing numerous reasons as to why it was flawed in terms of its interpretation of NPPF guidelines and therefore unfit for purpose. For the avoidance of doubt, I attach a copy of that submission for which I have an acknowledgement of receipt. Copied below (in italics) are paragraphs from the sections headed Objectives and Parcel Size that have relevance to the Councils identification of the sites proposed for further consultation. The scope of the methodology as defined in para J.2 limits the process to identifying only constraints of sites that the council is satisfied should be including within the Green Belt, rather than any opportunities that may exist. This broader approach should be acceptable, particularly given the statement in para 2.7 that this review process will not commit the Council to any future land release. Until a more positive approach is proposed, the claim in para 2.8 that the review will enable the Council to demonstrate that all available alternatives have been properly assessed cannot be correct. Furthermore, para 2.9 and 2.10 explains that whilst sites within the Green Belt have already been submitted to the Council for consideration they will not be considered prior to a review of the entire Green Belt being carried out but then also states that the review will seek to identify any potential constraints beyond their designation as Green Belt land that could still prevent development for other reasons. The methodology seems to be neither a high-level strategic review or search for opportunities, or a detailed parcel assessment. This approach seems contradictory and appears to seek only the restriction of any development. For the reasons set out above and below, it is considered that the approach of the Council is incorrect, including the three stages set out at paragraph 3.14. There is also a total lack of transparency about the approach the Council intends to adopt on the strategic purpose of the green belt, or the assessment of individual parcels. We do not consider that the parcels identified in Appendix 2 of the assessment will result in a balanced assessment of all the sites and will distort the assessment by having irregular and irrational parcel sizes. Furthermore, para 4.10 then takes this already narrow approach to parcel size definition and further restricts it by explaining that rather than identifying physical features that are readily recognisable and likely to be permanent, the methodology will use the “clearest and strongest boundaries available, mainly roads and railways” - there is no justification for the exclusion of other boundary features that meet the guidance in the NPPF which could reasonably include features such as but not limited to hedgerows, treelines, walls, fences, buildings, watercourses and footpaths. There is no basis to suggest</p>

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	<p>that a parcel should grow until the strongest possible boundaries are hit, as this will falsely create oversized parcels and thus distort the assessment of the individual pieces of land within those parcels which might be defined by otherwise strong boundaries. It is agreed that all land that has been submitted by landowners should be part of the proposed assessment. However, it is considered that each of those suggestions should be considered in isolation as a parcel as they are likely to represent land parcels defined by physical features on the ground.</p> <p>This narrow approach to parcel size definition falls short of the approach which Wirral Council should take and results in generally large parcels and will result in smaller, site specific characteristics being more easily overlooked. In addition, these larger parcel sizes will result in the categories defined in Purpose 1 (from para 5-3 to 5.12) being a poor representation of the facts. This again could result in sustainable development options being disregarded. There is a dichotomy in the methodology between for example the parcels that have been identified and the reference to SHLAA sites (para 4.14). It is considered that for an assessment to be robust the smallest reasonable parcel sizes should be adopted, and only combined where there is a specific rationale for so doing. An examination of the Council's map of the proposed Green Belt sites for further consideration utilised at their Public Briefings, confirms that the methodology has been utilised in a manner to bring forward a preponderance of sites in areas in which the Council has consistently attempted by other means to encourage development, rather than adopting a Borough wide approach to meeting identified need. For example there are no meaningful, available and achievable sites identified in Hoylake in spite of an area of some 428 hectares of Green Belt in the area. This outcome was foreseen in my submission of the 5th December 2017 which is reproduced below and therefore casts into doubt the robustness and validity of the exercise. The above comments demonstrate that the Initial Green Belt Review Proposed Methodology is not fit for purpose - it operates within a selective and over-reaching remit that appears to have been designed to severely limit the possibility of any sites being identified that could reasonably be released from the Green Belt to deliver sustainable development. Even the potential for such sites to exist should be viewed as a positive opportunity in that it could result in the delivery of housing or other development in areas in which development opportunities are limited but sorely needed to meet the aims and objectives of the Council's Local Plan. The methodology should be reformulated to have a positive and proactive approach in order to meet the requirements of the development opportunities review. There are two further areas of concern that call into question the application of the methodology, one is site specific and the other procedural. As mentioned earlier there are no meaningful sites proposed for release in Hoylake. However, the Green Belt area designated as SP015 which comprises some 428 hectares which has an urban enclosure index of 65% should have been taken into consideration for release. By utilising the flawed methodology this large area of green belt was removed from consideration whilst at the same time the council was promoting through its agents, CBRE the marketing of 160 homes on this green belt site. Either by design or oversight this surely is a dichotomy.</p> <p>On a point of robust procedure and in order to ensure that all sites proposed by landowners and developers under the call for sites but currently within the Green Belt were properly assessed then a review of their inclusion or otherwise on the Brownfield Register should have taken place. Furthermore, para 2.9 and 2.10 of the methodology explains that whilst sites within the Green Belt have already been submitted to the Council for consideration they will not be considered prior to a review of the entire Green Belt being carried out but then also states that the review will seek to identify any potential constraints beyond their designation as Green Belt land that could still prevent development for other reasons. There must undoubtedly be sites that do not have any constraint other than being included in the Green Belt that should have been identified for further Sustainable, deliverable and achievable brownfield sites which were originally not included on The Register due to also being in the Green Belt would therefore have been considered more appropriate for release rather than verdant greenfield sites. This has not taken place and again calls into question the methodology of the exercise. The consequence of both the flawed methodology and the lack of a review of brownfield sites mean that the majority of sites being proposed for consideration fall into this green field category and in many cases are productive agricultural land. Surely not the preferred outcome of the exercise nor one that is recommended in both the NPPF guidelines and the Local Government Association Green Belt Guidance Booklet. Moving from the general to the specific in relation to the lack of release of suitable land for development in Hoylake I would bring to your attention the site at Carr Lane designated as SHLAA627. The reason given for not releasing the site at Carr Lane which was included in Area SP015 Upper Birket Valley, in the Summary of Initial Green Belt Assessment for Public Consultation was 'it would form a discordant intrusion of urban development in an otherwise flat and open landscape'. However, the site itself is enclosed on all four boundaries. To the north west by the existing urban boundary, to the north by hedgerows and a permanent water course, to the south by woodland and to the south west by a public right of way whose edges are delineated by mature poplars to one side and hedgerows to the other. By releasing the site for development any extension to the existing urban boundary would be restricted and well screened from the surrounding area and could not be considered a discordant intrusion as the boundaries of that 'intrusion' already exist. Therefore, it should not have been amalgamated into the wider area of SP015. It is assumed that a Local Plan Inspector will wish to examine this in light of the lack of any other meaningful sites in Hoylake being considered. Additionally, this is the exact area that the council have designate for the Hoylake Golf Resort with all its associated commercial and residential buildings. Furthermore the Council have also commissioned CBRE to market elements of the Resort for the development of 160 executive homes. This together with the Council acquiring land to consolidate the area for this development (Cabinet Meeting 13 March 2014) and voting funds to facilitate the development (Cabinet Meeting 18 December 2017) surely indicates the firm intention that in the near future it will no longer be a flat and open landscape thereby obviating the albeit flawed reasoning detailed above. The site is in a sustainable location, as determined by the Inspector at a Public Inquiry (APP/W4325/A/12/2184753) not in the Flood Plan, is registered as derelict land on the National Land Usage Database and a site designated as B019 for inclusion in Part 1 of the Wirral Brownfield Register it should have been at the forefront of sites considered for release. Had the Brownfield Review which should have preceded the Green Belt review taken place, in order to demonstrate and comply with NPPF guidelines that all available sites had been considered prior to a release of Proposed Green Belt Sites, then the site would have been released for further consideration. This has not been the case. Looking at the bigger picture it is apparent that no meaningful sites have been identified in Hoylake for release that would meet the urgent need for housing in general and affordable housing in particular. That the Carr Lane site would address such needs is amply demonstrated by the comments contained in the initial SHLAA site</p>

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	<p>assessment undertaken [consultant] (SHLAA ref 627) which states 'excellent achievability (can be used for five year supply)' This view is strongly supported the Planning Inspectors decision at a Public Inquiry (APP/W4325/A/12/218753) which states 'On the other hand, I have concluded that significant weight should be afforded to the contribution which the appeal site would make towards addressing the shortfall of housing within the Borough. In addition, I have concluded that significant weight should also be afforded to the contribution which the appeal site would make towards addressing the shortfall of affordable housing in the Borough and that limited weight in favour of the proposal is afforded by the reuse of previously developed land on the appeal site. In addition to the above, other benefits that would accrue to the community at large are as follows. Firstly, it would make a make a significant and immediate contribution to the Council achieving its published aim of delivering 3500 new homes in the borough by 2020 (Council Housing Strategy 2020 Vision). Secondly the size of the site together with its location make it ideally adaptable for delivering a mixed use three generation development, with for example the provision of a Care Home, Nursery and recreational facilities. Thirdly by exploring such options there would be the opportunity of providing training and employment in social services areas which are already recognised as much needed throughout the borough. Finally releasing the site for development would not only meet the urgent demand for new homes in Hoylake but would address that in a way which would not increase the density of housing and its consequent increased traffic problems in the overcrowded other areas of the town, something already concerning residents and councillors. Given all the above together with commitment from a number of developers and Housing Associations to immediately commence building homes it is mystifying as to why the site has not been considered for release alongside or in preference to those proposed.</p> <p>Initial Green Belt Review, Background Report, September 2018</p> <p>Para 1.4. The outline of the methodology adopted whilst selectively quoting National Policy in respect of boundaries is unduly restrictive. Reference to this was contained in my Response to proposed Methodology Consultation of the 5th December 2017 and has not been into consideration in this exercise and is something I have no doubt a Local Plan Inspector will wish to examine. I reproduce below my comments from that submission in the context of responding to this consultation.</p> <p>The scope of the methodology as defined in para 1.2 limits the process to identifying only constraints of sites that the council is satisfied should be including within the Green Belt, rather than any opportunities that may exist. This broader approach should be acceptable, particularly given the statement in para 2.7 that his review process will not commit the Council to any future land release. Until a more positive approach is proposed, the claim in para 2.8 that the review will enable the Council to demonstrate that all available alternatives have been properly assessed cannot be correct. Furthermore, para 2.9 and 2.10 explains that whilst sites within the Green Belt have already been submitted to the Council for consideration they will not be considered prior to review of the entire Green Belt being carried out but then also states that the review will seek to identify any potential constraints beyond their designation as Green Belt land that could still prevent development for other reasons. The methodology seems to be neither a high-level strategic preview or search for opportunities or a detailed parcel assessment. This approach seems contradictory and appears to seek only the restriction of any development.</p> <p>Para 1.5. The constraints applied by the policy outlined in para 1.4 make the statement in para 1.5 redundant. The application of this overly restrictive methodology will result in the restriction of potentially more appropriate sustainable, achievable and deliverable parcels not being considered for release. Yet this deliverability is something which the Council have stressed in their Open Day presentation to the public at large as key importance.</p> <p>Thus, sites within the Green Belt submitted by landowners and developers for consideration that have no other high level of constraints other than their inclusion within the Green Belt will be immediately debarred from consideration by not having a main road, railway, river bounding the proposed site. Consequently a Local Plan Inspector will conclude that all possible and reasonable options and parcels have not been considered.</p> <p>Para 1.14. My views on the findings of this report are encapsulated in my response to paras. 1.4-5. The methodology being used in the assessment of available land parcels within the Green Belt is fundamentally flawed and as such negates the robustness and validity of the vast majority of the extrapolated data.</p> <p>Para 1.15. Notwithstanding my response to the para above in response to this para I draw your attention to site SHLAA627 at Carr Lane Hoylake. As part of the decision reach at a Public Inquiry (APP/W4325/A/12/184753) it was concluded that the site was in a sustainable location and furthermore the following was also noted.</p> <p>'On the other hand, I have concluded that significant weight should be afforded to the contribution which the appeal site would make towards addressing the shortfall of housing with the Borough. In addition, I have concluded that significant weight should also be afforded to the contribution which the appeal site would make towards addressing the shortfall of affordable housing the Borough and that limited weight in favour of the proposal is afforded by the reuse of previously developed land on the appeal site'</p> <p>I can also confirm there are no constraints that could influence limit or prevent its future delivery. Such potential constraints were examined through the information submitted at the public inquiry and confirmed in the subsequent judgement as not being limiting factors.</p> <p>Para 1.16 The baseline data contained in the [consultant] SHLAA report on site ref 627 (which is attached) remains the same. I would draw your attention to its availability and achievability result which is excellent achievability (can be used for five year supply). In response to the other three points in this paragraph I would again draw your attention to the comments of the Inspector at the Public Inquiry relating the significant weight that should be attached to the provision of homes and affordable homes in particular and that evidence produced at the inquiry confirmed there were no other constraints applying to the site other than its inclusion in the Green Belt.</p> <p>Other benefits that would accrue to the community at large are as follows: Firstly, it would make a significant and immediate contribution to the Council achieving its published aim of delivering 3,500 new homes in the borough by 2020 (Council Housing Strategy 2020 vision). Secondly, the size of the site together with its location make it ideally adaptable for delivering a mixed use three</p>

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	<p>generation development, with for example the provision of a care home, nursery and recreational facilities. Thirdly, by exploring such options there would be the opportunity of providing training and employment in social services areas which are already recognised as much need throughout the Borough. Finally, releasing the site for development would only meet the urgent demand for new home in Hoylake but would address in a way which would not increase the density of housing and its consequent increased traffic problems in the already overcrowded other areas of the town. Something already concerning residents and councillors.</p> <p>Para 2.11. in responding to the five purposes of why land should be in the Green Belt I make the following observations as to how the Carr Lane site respond to those purposes. To check the unrestricted sprawl of large built up area. The site itself is restricted on all four boundaries. To the north west by the existing urban boundary, to the north by hedgerows and a permanent water course, to the south by the woodland and to the south west by a public right of way whose edges are delineated by mature poplars to one side and hedgerows to the other. By releasing the site for development any extension to the existing urban boundary would be restricted and well screened from the surrounding areas and could not be considered a discordant intrusion as that 'intrusion' already exists.</p> <ul style="list-style-type: none"> • To prevent neighbouring towns merging into one another. The councils own data in Table 3 indicates that the release of the site would not contribute to such merging. • To assist in safeguarding the countryside from encroachment. As outlined above the site is already highly enclosed and the comments in response to point 5 questions whether it can be classed as countryside. • To preserve the setting and special character of historic towns. The site abuts an existing council estate and is accessed via the Carr Lane Trading Estate on this basis it is arguable whether there are any special or unusual characteristics that may need to be safeguarded. Nevertheless, a planning inspector will assess any planning application in this context and direct what may or may not be acceptable. • To assist in urban regeneration by the recycling of derelict and other urban land. Whilst the site is within the existing urban boundary it is however registered on the National Land Usage Database as derelict land and it is acknowledged that a significant part of the site is previously developed/brownfield land. The recycling of the site would greatly assist the Council in meeting the housing requirement in the OAN. <p>Para 3.3-3.6. Response to the methodology used in these restrictive and inappropriate policies are contained in my submission to para 1.4</p> <p>SHLAA site ref 627 is in a sustainable location, as determined by the Inspector at a Public Inquiry (APP/W4325/A12/2184753) not in the Flood Plan, is registered as derelict land on the National Land Usage Database and a site designated as B019 for inclusion in Part 1 of the Wirral Brownfield Register it should have been at the forefront of sites considered for release. It should not be debarred from consideration by a narrow and flawed interpretation of NPPF guidelines.</p> <p>Further had the brownfield review which should have preceded the Green Belt review taken place, in order to demonstrate and comply with NPPF guidelines that all available sites had been considered prior to a release of proposed green belt sites, then given all of the above the site should have been released for further consideration.</p> <p>My initial comments relate to the methodology which was applied in identifying these sites in preference to the many other sites that were proposed by landowners and developers in response to the Councils call for sites exercise. I responded to the consultation exercise regarding this methodology on 5th December 2017 detailing numerous reasons as to why it was flawed in terms of its interpretation of NPPF guidelines and therefore unfit for purpose.</p> <p>For the avoidance of doubt, I attach a copy of that submission for which I have an acknowledgement of receipt. Copied below (in italics) are paragraphs from the sections headed Objectives and Parcel Size that have relevance to the Councils identification of the sites proposed for further consultation.</p> <p>The scope of the methodology as defined in para 1.2 limits the process to identifying only constraints of sites that the council is satisfied should be including within the Green Belt, rather than any opportunities that may exist. This broader approach should be acceptable, particularly given the statement in para 2.7 that this review process will not commit the Council to any future land release. Until a more positive approach is proposed, the claim in para 2.8 that the review will enable the Council to demonstrate that all available alternatives have been properly assessed cannot be correct. Furthermore, para 2.9 and 2.10 explains that whilst sites within the Green Belt have already been submitted to the Council for consideration they will not be considered prior to a review of the entire Green Belt being carried out but then also states that the review will seek to identify any potential constraints beyond their designation as Green Belt land that could still prevent development for other reasons. The methodology seems to be neither a high-level strategic review or search for opportunities, or a detailed parcel assessment. This approach seems contradictory and appears to seek only the restriction of any development.</p> <p>For the reasons set out above and below, it is considered that the approach of the Council is incorrect, including the three stages set out at paragraph 3.14. There is also a total lack of transparency about the approach the Council intends to adopt on the strategic purpose of the green belt, or the assessment of individual parcels.</p> <p>We do not consider that the parcels identified in Appendix 2 of the assessment will result in a balanced assessment of all the sites and will distort the assessment by having irregular and irrational parcel sizes.</p> <p>Furthermore, para 4.10 then takes this already narrow approach to parcel size definition and further restricts it by explaining that rather than identifying physical features that are readily recognisable and likely to be permanent, the methodology will use the "clearest and strongest boundaries available, mainly roads and railways" — there is no justification for the exclusion of other</p>

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	<p>boundary features that meet the guidance in the NPPF which could reasonably include features such as but not limited to hedgerows, treelines, walls, fences, buildings, watercourses and footpaths. There is no basis to suggest that a parcel should grow until the strongest possible boundaries are hit, as this will falsely create oversized parcels and thus distort the assessment of the individual pieces of land within those parcels which might be defined by otherwise strong boundaries.</p> <p>It is agreed that all land that has been submitted by landowners should be part of the proposed assessment. However, it is considered that each of those suggestions should be considered in isolation as a parcel as they are likely to represent land parcels defined by physical features on the ground.</p> <p>This narrow approach to parcel size definition falls short of the approach which Wirral Council should take and results in generally large parcels and will result in smaller, site specific characteristics being more easily overlooked. In addition, these larger parcel sizes will result in the categories defined in Purpose 1 (from para 5-3 to 5.12) being a poor representation of the facts. This again could result in sustainable development options being disregarded.</p> <p>There is a dichotomy in the methodology between for example the parcels that have been identified and the reference to SHLAA sites (para 4.14). It is considered that for an assessment to be robust the smallest reasonable parcel sizes should be adopted, and only combined where there is a specific rationale for so doing.</p> <p>An examination of the Councils map of the proposed Green Belt sites for further consideration utilised at their Public Briefings, confirms that the methodology has been utilised in a manner to bring forward a preponderance of sites in areas in which the Council has consistently attempted by other means to encourage development, rather than adopting a Borough wide approach to meeting identified need. For example there are no meaningful, available and achievable sites identified in Hoylake in spite of an area of some 428 hectares of Green Belt in the area.</p> <p>This outcome was foreseen in my submission of the 5th December 2017 which is reproduced below and therefore casts into doubt the robustness and validity of the exercise</p> <p>The above comments demonstrate that the Initial Green Belt Review Proposed Methodology is not fit for purpose — it operates within a selective and over-reaching remit that appears to have been designed to severely limit the possibility of any sites being identified that could reasonably be released from the Green Belt to deliver sustainable development. Even the potential for such sites to exist should be viewed as a positive opportunity in that it could result in the delivery of housing or other development in areas in which development opportunities are limited but sorely needed to meet the aims and objectives of the Council's Local Plan. The methodology should be reformulated to have a positive and proactive approach in order to meet the requirements of the development opportunities review.</p> <p>There are two further areas of concern that call into question the application of the methodology, one is site specific and the other procedural. As mentioned earlier there are no meaningful sites proposed for release in Hoylake. However, the Green Belt area designated as SP015 which comprises some 428 hectares which has an urban enclosure index of 65% should have been taken into consideration for release. By utilising the flawed methodology this large area of green belt was removed from consideration whilst at the same time the council was promoting through its agents, CBRE the marketing of 160 homes on this green belt site. Either by design or oversight this surely is a dichotomy.</p> <p>On a point of robust procedure and in order to ensure that all sites proposed by landowners and developers under the call for sites but currently within the Green Belt were properly assessed then a review of their inclusion or otherwise on the Brownfield Register should have taken place.</p> <p>Furthermore, para 2.9 and 2.10 of the methodology explains that whilst sites within the Green Belt have already been submitted to the Council for consideration they will not be considered prior to a review of the entire Green Belt being carried out but then also states that the review will seek to identify any potential constraints beyond their designation as Green Belt land that could still prevent development for other reasons. There must undoubtedly be sites that do not have any constraint other than being included in the Green Belt that should have been identified for further consideration and I detail below one such site.</p> <p>Sustainable, deliverable and achievable brownfield sites which were originally not included on The Register due to also being in the Green Belt would therefore have been considered more appropriate for release rather than verdant greenfield sites. This has not taken place and again calls into question the methodology of the exercise. The consequence of both the flawed methodology and the lack of a review of brownfield sites means that the majority of sites being proposed for consideration fall into this green field category and in many cases are productive agricultural land. Surely not the preferred outcome of the exercise nor one that is recommended in both the NPPF guidelines and the Local Government Association Green Belt Guide SHLAA627</p> <p>The reason given for not releasing the site at Carr Lane which was included in Area SP015 Upper Birket Valley, in the Summary of Initial Green Belt Assessment for Public Consultation was 'it would form a discordant intrusion of urban development in an otherwise flat and open landscape'</p> <p>However, the site itself is enclosed on all four boundaries. To the north west by the existing urban boundary, to the north by hedgerows and a permanent water course, to the south by woodland and to the south west by a public right of way whose edges are delineated by mature poplars to one side and hedgerows to the other. By releasing the site for development any extension to the existing urban boundary would be restricted and well screened from the surrounding area and could not be considered a discordant intrusion as the boundaries of that 'intrusion' already exist. Therefore, it should not have been amalgamated into the wider area of SP015. It assumed that a Local Plan Inspector will wish to examine this in light of the lack of any other meaningful sites in Hoylake being considered.</p> <p>Additionally, this is the exact area that the council have designate for the Hoylake Golf Resort with all its associated commercial and residential buildings. Furthermore the Council have also commissioned CBRE to market elements of the Resort for the development of 160 executive homes. This together with the Council acquiring land to consolidate the area for this development (Cabinet Meeting 13 March 2014) and voting funds to facilitate the development (Cabinet Meeting 18 December 2017) surely indicates the firm intention that in the near future it will no longer be a</p>

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	<p>flat and open landscape thereby obviating the albeit flawed reasoning detailed above.</p> <p>The site is in a sustainable location, as determined by the Inspector at a Public Inquiry (APP/W4325/A/12/2184753) not in the Flood Plan, is registered as derelict land on the National Land Usage Database and a site designated as B019 for inclusion in Part 1 of the Wirral Brownfield Register it should have been at the forefront of sites considered for release.</p> <p>Had the Brownfield Review which should have preceded the Green Belt review taken place, in order to demonstrate and comply with NPPF guidelines that all available sites had been considered prior to a release of Proposed Green Belt Sites, then the site would have been released for further consideration. This has not been the case.</p> <p>Looking at the bigger picture it is apparent that no meaningful sites have been identified in Hoylake for release that would meet the urgent need for housing in general and affordable housing in particular. That the Carr Lane site would address such needs is amply demonstrated by the comments contained in the initial SHLAA site assessment undertaken by [consultant] (SHLAA ref 627) which states 'excellent achievability (can be used for five year supply)'</p> <p>This view is strongly supported the Planning Inspectors decision at a Public Inquiry (APP/W4325/A/12/218753) which states 'On the other hand, I have concluded that significant weight should be afforded to the contribution which the appeal site would make towards addressing the shortfall of housing within the Borough. In addition, I have concluded that significant weight should also be afforded to the contribution which the appeal site would make towards addressing the shortfall of affordable housing in the Borough and that limited weight in favour of the proposal is afforded by the reuse of previously developed land on the appeal site.'</p> <p>In addition to the above, other benefits that would accrue to the community at large are as follows. Firstly, it would make a make a significant and immediate contribution to the Council achieving its published aim of delivering 3500 new homes in the borough by 2020 (Council Housing Strategy 2020 Vision). Secondly the size of the site together with its location make it ideally adaptable for delivering a mixed use three generation development, with for example the provision of a Care Home, Nursery and recreational facilities. Thirdly by exploring such options there would be the opportunity of providing training and employment in social services areas which are already recognised as much needed throughout the borough. Finally releasing the site for development would not only meet the urgent demand for new homes in Hoylake but would address that in a way which would not increase the density of housing and its consequent increased traffic problems in the overcrowded other areas of the town, something already concerning residents and councillors.</p> <p>Given all the above together with commitment from a number of developers and Housing Associations to immediately commence building homes it is mystifying as to why the site has not been considered for release alongside or in preference to those proposed.</p> <p>[Baseline data from SHLAA2010 site 627 attached]</p> <p>[SHLAA site assessment for former [Ellerman Lines Sports Ground attached]</p> <p><u>Preface</u></p> <p>Paragraph 1.2 sets out the objective and scope of the assessment. That scope suggests the assessment will do more than simply consider the purposes of the green belt. It is unclear as to what identify any other physical or policy constraints that may be relevant to take into account" means and how it will influence the assessment of the green belt. It should not be necessary for other policies to influence the green belt assessment, albeit it can be appropriate to consider other constraint information to discount sites from the assessment. This should be based on facts and not the application / interpretation of policy or guidance.</p> <p><u>Introduction</u></p> <p>In terms of paragraph 2.2, the assumptions and spatial distribution of development made in the previous submission draft Core Strategy should not influence the assessment of Green Belt in an evidence based document. The purpose of this document is to inform decisions made through the Local Plan process, and not to pre-judge that process by the application of policies and assumptions.</p> <p>For example, it is the purpose of the Sustainability Appraisal which accompanies any future plan to assess "the likely consequences for sustainable development". It should be made clear that the Introduction section is simply background rather than part of the methodology. This should not be perceived as backfilling the evidence base.</p> <p><u>Objectives</u></p> <p>The scope of the methodology as defined in para 1.2 limits the process to identifying only constraints of sites that the council is satisfied should be including within the Green Belt, rather than any opportunities that may exist. This more broad approach should be acceptable, particularly given the statement in para 2.7 that this review process will not commit the Council to any future land release. Until a more positive approach is proposed, the claim in para 2.8 that the review will enable the Council to demonstrate that all available alternatives have been properly assessed cannot be correct.</p> <p>Furthermore, para 2.9 and 2.10 explains that whilst sites within the Green Belt have already been submitted to the Council for consideration they will not be considered prior to a review of the entire Green Belt being carried out but then also states that the review will seek to identify any potential constraints beyond their designation as Green Belt land that could still prevent development for other reasons. The methodology seems to be neither a high level strategic review or search for opportunities, or a detailed parcel assessment. This approach seems contradictory and appears to seek only the restriction of any development.</p> <p>For the reasons set out above and below, it is considered that the approach of the Council is incorrect, including the three stages set out at paragraph 3.14. There is also a total lack of transparency</p>

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	<p>about the approach the Council intends to adopt on the strategic purpose of the green belt, or the assessment of individual parcels. An approach that allows both opportunities as well as constraints to be identified and understood will more accurately meet the intended aims of the development options review for Wirral. The process should not be prejudiced by an assumption that could result in sustainable development options being disregarded.</p> <p><u>Parcel Size</u></p> <p>The settlement areas have no basis for this assessment and will distort the outcome of the assessment and thus its validity as an evidenced based document. The boundaries of the green belt assessment should consider all land within the Green Belt having regard to physical features rather than artificial boundaries such as parish, ward or settlement boundaries. When justifying the identification of Green Belt parcels, the methodology makes reference to para 85 of the NPPF and quotes only the sixth of six individual considerations that local planning authorities should have regard to, this being the element which has regard to physical features that are readily recognisable and likely to be permanent. The methodology then uses this as the basis for the justification of the assessment of boundary strength for these parcels. This approach omits the other five requirements when defining boundaries which, in brief, relate to: meeting requirements for sustainable development as set out in the Local Plan; not including land which it is unnecessary to keep permanently open; the use of 'safeguarded land' designations instead, in order to meet longer-term development needs; clarification of the function 'safeguarded land'; and, the integrity of the Green Belt boundaries within the lifetime of the development plan. We do not consider that the parcels identified in Appendix 2 of the assessment will result in a balanced assessment of all the sites and will distort the assessment by having irregular and irrational parcel sizes.</p> <p>Furthermore, para 4.10 then takes this already narrow approach to parcel size definition and further restricts it by explaining that rather than identifying physical features that are readily recognisable and likely to be permanent, the methodology will use the "clearest and strongest boundaries available, mainly roads and railways" — there is no justification for the exclusion of other boundary features that meet the guidance in the NPPF which could reasonably include features such as but not limited to hedgerows, treelines, walls, fences, buildings, watercourses and footpaths. There is no basis to suggest that a parcel should grow until the strongest possible boundaries are hit, as this will falsely create oversized parcels and thus distort the assessment of the individual pieces of land within those parcels which might be defined by otherwise strong boundaries.</p> <p>It is agreed that all land that has been submitted by landowners should be part of the proposed assessment. However, it is considered that each of those suggestions should be considered in isolation as a parcel as they are likely to represent land parcels defined by physical features on the ground.</p> <p>Para 5.27 proposed that boundary corrections will be made where the existing Green Belt boundaries may need to be corrected without any direct references to the method that would be used. Presumably the intention is that the method described in the wider proposal would be used — the comments made in this representation would apply to any such corrective mechanism. This narrow approach to parcel size definition falls short of the approach which Wirral Council should take and results in generally large parcels will result in smaller, site specific characteristics being more easily overlooked. In addition, these larger parcel sizes will result in the categories defined in Purpose 1 (from para 5-3 to 5.12) being a poor representation of the facts. This again could result in sustainable development options being disregarded.</p> <p>There is a dichotomy in the methodology between for example the parcels that have been identified and the reference to SHLAA sites (para 4.14). It is considered that for an assessment to be robust the smallest reasonable parcel sizes should be adopted, and only combined where there is a specific rationale for so doing.</p> <p>We have set out above our concerns regarding the assessment of the strength of boundaries, and the lack of clarity in the application of this aspect of the methodology, exemplified by the Councils approach to identifying oversized parcels. It is not considered that durable features should just be taken as existing urbanising features, and there is no basis to suggest that trees, woodland and hedgerows cannot be durable features.</p> <p><u>The Scope of the Methodology</u></p> <p>Stage 2 (from para 6.1) of the report states that the Green Belt parcels will also need to be assessed to anticipate any other constraints which would prevent sites from being considered for new development, including but not limited to considerations relating to flood risk, the agricultural quality of the land, infrastructure development potential and ecology. These considerations are fundamentally beyond the scope of the purposed of the Green Belt review as based on the five purposes of the Green Belt set out in para 80 of the NPPF, and should therefore not be included in the proposed methodology.</p> <p>This is unless there is intended to be a filtering process where land that is realistically undevelopable or so isolated so as to not be well located for any development is excluded from the process so as to ensure that the assessment is not a waste of time. For example, sites that are in a functional flood plan, SSSI, SAC, SPA and Ramsar should be used to either define the parcels in the first place, or exclude land and parcels from the assessment. The parcels should be identified that the assessment will not be adversely affected by constraints on a wider site that would have little if any bearing on the development of the smaller parcel.</p> <p>Agricultural land quality should only be a significant influencing factor where the land in question is grade 1 and part of a larger area of valuable land. Care should be taken not to discount land too early, for example flood zone 2 should not be used as a basis to discount land. Landscape character should not be a factor that influences the green belt assessment.</p> <p>In order to inform such assessments of constraints the Council should use evidence from planning applications on that land where that is relevant.</p>

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	<p>We have set out above why we think it is inappropriate to include stage 3 in this process and therefore this step should be omitted. It is unclear how the next steps, including specifically those set out at paragraph 8.3 will relate to this assessment. Fundamentally it is considered that this should be incorporated in the current assessment, or a methodology should be set out now to proceed that that stage in due course. This way consultees will have a full understanding of the proposed scope of the assessment. It is not possible to undertake the task set out at 8.4 currently without this intermediary step, which appears to be outside the scope of the work envisaged.</p> <p><u>Conclusion</u></p> <p>The above comments demonstrate that the Initial Green Belt Review Proposed Methodology is not fit for purpose — it operates within a selective and over-reaching remit that appears to have been designed to severely limit the possibility of any sites being identified that could reasonably be released from the Green Belt to deliver sustainable development. Even the potential for such sites to exist should be viewed as a positive opportunity in that it could result in the delivery of housing or other development in areas in which development opportunities are limited but sorely needed to meet the aims and objectives of the Council's Local Plan. The methodology should be reformulated to have a positive and proactive approach in order to meet the requirements of the development opportunities review.</p>
DOR00188	same as DOR00177
DOR00189	<p>I wish to draw your attention to the article by Clare Rainsford published in the Heswall Magazine October 2018, in which she presents cogent reasons for preserving Wirral's Green Belt. By its nature as a peninsular, Wirral's landmass is finite. The existing balance of resources/amenities available to residents is threatened by the present proposals for reducing the Green Belt from 45% to a possible 23%. Once lost, the benefits of our existing Green Belt, with its contribution to a healthy planet and enhancement of the human environment, eroded over generations, cannot be regained. An influx of mass development would destabilise the local infrastructure: health and local transport services (public transport is virtually non-existent in some areas) are finding difficulty, increasingly, in meeting the needs of the population especially the isolated sick and elderly. Many roads, particularly zone 4, still echo their origins from the days of pastoral horse and cart transport. Apart from the evident struggle to maintain them, they are increasingly congested. A situation not improved by heavy goods transport which is seriously damaging surfaces in some areas eh: Caldý Road's very narrow S bend by Caldý Church. The latter road has become a short cut to West Kirby for traffic dependent on satnav (sixteen wheelers are known to jam at this point). The likely effects (volumes of traffic, increased pollution, added demands for all public services) of the proposed increase in population imposed on the green lungs of an already substantial community can barely be imagined. The present congestion experienced at the river tunnels, early and late in the date, is set to increase exponentially with an increased building programme adding to the volume of traffic and increased air pollution. [Attached article from Heswall Magazine, October 2018]</p>
DOR00190	same as DOR00177
DOR00191	<p>1. Wirral Local Plan Consultation Validity I believe that the current consultation process is critically flawed and therefore invalid. I consider that the Council's projected need to build 803 dwellings each year for the next 15 years is far too high. The entire consultation process and proposals put forward by the Council at all the public meetings have been based on a national government "broad-brush" approach figure of 803 dwelling per annum being required each year for the next 15 years. Whilst this figure may be approximate for some part of the country, I believe this figure is grossly in excess of what is required for the Wirral given its unique character as a peninsula and near static population and jobs forecast over the next 15 years (Wirral's population has fallen by around 20,000 since 1981, whereas the housing stock has increased). The figures have been challenged by [another respondent] as being wholly excessive, and none of the people attending the public meetings, or the local councillors who have spoken out on the issue, agree with the 803 dwellings a year requirement. Even the Council Leader Philip Jones has stated in a public letter to Wirral Households that he does not agree that this figure is correct. Despite requests at the public meetings, and repeated email requests to the Council's Major Growth projects and Housing Delivery Department, I have yet to see the Council produce any written justification to support the figure of 803 dwellings per year as appropriate for Wirral's needs. My letters and emails to the Council Leader throughout the consultation process requesting further information on this figure have gone completely unanswered. Using the broad-brush Government Standard Method calculation using the recently published ONS 2016 projections reduces the above housing requirement figure from 803 to 488 new dwellings per annum. This is nearly half the figure that the Council's consultation presentations have dogmatically adopted throughout the so-called consultation process – and probably still on the high side. Strangely, although the Council's officers were apparently aware that this new figures was due for publication, no mention was made of this during the public consultation meeting presentation? When there is so much uncertainty/inaccuracy in the figure underpinning the very justification for the release of green belt (and the current consultation process), how can any individual evaluate the facts and form an accurate opinion when the foundation information that has been presented to them is so wrong? How can the Council rely on these figures? The answer to both questions is, of course, that they can't! In my view the public have been misinformed with the key information that lies at the crux of the consultation. This undermines the whole process and grossly over-exaggerates the need to release green belt. In fact, I would go as far as to question the legal legitimacy of the current consultation. A new consultation process needs to be started when the Council has produced an accurate set of housing need projection figures bases on the Wirral's genuine needs, and when the detailed calculations and assumptions have been published so that the public can scrutinise it and comment on it properly. This must happen before any green belt is considered for release.</p> <p>2. Housing Land Availability. I believe that inadequate land to meet Wirral's housing requirements is already available. Even accepting the Government standard method for calculating housing requirements, and using the latest ONS 2016 figures above, the projected housing requirements for Wirral over the next 15 years is 488 x 15 – 7,320 new dwellings. The July 2018 Council Cabinet document (page 9) has already identified land supply (non-green belt) for an estimated 7,635 dwellings. If this is added to the most pessimistic forecast of an additional 1,100 dwellings associated</p>

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	<p>with Wirral Waters, equates to a forecast availability of 8,735 new dwellings. This represents a surplus of 1,415 dwellings (almost 20% over the projected government requirements. Clearly, there is no need or justification for the release of any green belt. Clearly, investors and developers will be keen to make a killing by making lucrative deals with green belt land owners and building far more profitable housing on green belt than on existing brown field sites that are crying out for development. No green belt should be even considered for release until all the available brown field sites have been developed, or are under development. To do otherwise will just dis-incentivise developers from building on brown field sites and undo the hard work and effort that the planners have put into trying to encourage brown field site development in the past. These are often in the most deprived areas of Wirral where undoubtedly investment and affordable housing is needed most.</p> <p>3. Green Belt Selection method. I believe that the method for Green Belt selection for consideration for release for housing is wrong/inappropriate. The primary role of the green belt is to prevent urban sprawl and prevent small settlements and villages (such as Irby, Pensby, Thingwall and Heswall) from losing their individual charm, character and community merging into one another to become a large continuous built-up conglomerate. This approach has traditionally been applied by Wirral Council's Planning Department when determining individual planning applications for house building on green belt for many years and as far as I am aware, this is still the case. However, this approach appears to have been abandoned by the Council when determining which areas of green belt should be selected/included for consideration for release under the current consultation exercise. Instead, the Council has chosen to adopt the much larger "Settlement Area" definition when applying the green belt test. This means that areas where development previously would have been classed as urban sprawl because they separated towns and villages (and therefore would never have been released for house building) are now being classed as in-fill within the larger settlement area and are now up for potential release – despite the damage this will do to the local amenity. I strongly disagree with this approach. This was never what was intended when the green belt was initially established. It merely serves as a convenience means for the Council to justify in their minds why certain green belt areas could be release for house building now, whereas previously it would have been considered to fly in the face of the fundamental green belt principle.</p> <p>4. Specific Land Parcels in Irby.</p> <p>I object to the release of this parcel of land SP059 from the green belt on the following grounds:</p> <ul style="list-style-type: none"> • The entire SP059 parcel of existing green belt land between Irby Road and Telegraph Road is highly sought after by housing developers. The release of any part of this land is likely to open the floodgates for more of the investors/developers to apply pressure to seek the release of further portions of the land on the bit-by-bit basis. As there is no clear boundary to the west of parcel SP059E it will be difficult to prevent/defend against further release under green belt rules. • The land is high quality arable land • The land borders onto Irby Hall, a scheduled monument, the character of which would be damaged by the construction of a large housing estate backing into its grounds. • The land borders onto Beckford Road pond, a site of biological interest, which a recent survey has confirmed contains the Great Crested Newts (protected species) and the SP059E parcel of land is directly within range of the newts foraging habitat. • There are no public transport, infrastructure, or employment opportunities in the vicinity to support up to 85 new dwellings at this location. • Properties at this location will not be affordable to first time buyers. • Access is likely to be via Penrhyd/Backford road, neither of which are substantial enough to withstand the additional daily traffic from up to 85 new dwellings. • The loss of this green belt land to housing would have a high detrimental effect on the visual impact of the landscape. • There is no shortage of existing housing for sale in the area already <p>I object to the release of this parcel of land SP060 – South of Thingwall Road, Irby from the green belt on the following grounds:</p> <ul style="list-style-type: none"> • This parcel of land currently separates the villages of Irby, Pensby and Thingwall. Release of all or part of this land would constitute urban sprawl and lead to further encroachment by housing between the villages, and reduce or even eliminate the open space separation altogether. This area of land is a prime example for the type of land that the green belt was established to protect. If it was not for the Council's adoption of the "Settlement Area Methodology" there is no way that this green belt area would be considered for large scale development under conventional green belt rules. Recently an adjacent parcel of land (SHLAA1980) on the opposite side of Irby Road, to the south of Townsend Road, had a house building application rejected by both the Council Planning Officers (OUT/15/01635) and also on appeal to the Planning Inspectorate (APP/W4325/W/17/3167893). It was rejected on the grounds that it would represent inappropriate development. It would be harmful to the green belt; and it would cause considerable harm to the openness, character and appearance of the area. I see no reason why the SP060 land, on the opposite side of the road to the above application, should be treated any differently – particularly as it is much bigger in comparison and therefore its adverse effect would be even greater and more unjustifiable. • The land is high quality arable land • There are no public transport, infrastructure or employment opportunities in the vicinity to support up to 846 new dwellings at this location. • Properties at this location will not be the type affordable to first time buyers. • The local road infrastructure is not substantial enough to withstand the additional daily traffic from up to 846 new dwellings. Existing roads around the area are already too busy.

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	<ul style="list-style-type: none"> • The loss of this green belt land to housing would have a high detrimental effect on the visual impact of the landscape. • This parcel of land contains Harrock Wood that would become an isolated thin wooded area amidst a busy housing real estate that would destroy its character and natural habitat and undoubtedly result in becoming over used and ruined. • There is no shortage of existing housing for sale in the area already
DOR00192	<p>I agree that more affordable housing is required and should be built, I am angered that so much of our precious Green Belt land (especially SP060) is being earmarked when many brownfield sites are still available. The green belt area is one of the main reasons I came to live here and I continue to enjoy the village life. The woodland areas are vitally important for their wildlife and are frequented by many local residents, dog walkers etc. I was very distressed when I heard that the whole Green Belt area between Pensby, Thingwall and Irby could now be considered for building. This is not acceptable and I shall explain why. ● After previous planning permission was rejected and even on appeal, the land was brought into the Green Belt to protect it. Surely this is a decisive factor. “The fundamental aim of green belt policy is to keep land permanently open and the important attribute to Green belts is their openness”. ● Menlo Avenue and Elm Road already have traffic problems. Cars cannot park on the road in Menlo Avenue because it is too narrow so they use Elm Road. This in turn causes problems for other residents and disrupts access for utility and delivery vehicles. ● Harrock Wood (which belongs to the National Trust) and Wych Elm are extremely popular and well used by residents. They are also a haven for our local wildlife: bats, ducks, geese, owls, woodpeckers, frogs and newts etc. Please protect them. ● I purchased my home for its situation and so that I could be part of a village community. I love the area and I know my neighbours feel the same way. If the plans were to go ahead, Pensby, Thingwall and Irby would become one concrete block with no individual identity and nowhere to breathe.</p>
DOR00193	<p>I wish to object to the desecration of Wirral’s green belt and indeed question the necessity for such a drastic course of action. I am led to believe that the projected population of Wirral is on the decline and the mathematics of building more homes for less people escapes me especially as there appears to be a considerable amount of brownfield sites available. However I do understand that they are not popular with developers. I also understand that the percentage of Green Belt land in Wirral is already considerably below the national average, this further proposal is not sustainable on such a small peninsula. The particular area that concerns me is that encompassing the land from the Glegg Arms to Beers industrial Site. These fields are home to a large variety of wildlife such as badgers, bats, foxes, hares, pheasants and many smaller animals. There are also considerable amount of mature trees such as oak. Apart from the children’s playground, even Heswall FC’s ground appears to be under threat. I would also point out that the only possible exit/entry from the Sandham Grove estate is a narrow road adjacent to Barnston Primary School. This would probably mean that all traffic would have to use Chester High Road an already congested thoroughfare with a potentially dangerous roundabout adjacent to the Glegg Arms.</p>
DOR00194	<p>We understand the reasons for the review but have great difficulty understanding why a working dairy farm should be under consideration when releasing land from greenbelt status. This has been high grade agricultural land for decades in an area of natural beauty. Greasby Copse is on this land and is home to a wide range of wildlife. I have frequently seen foxes, birds of prey, bats and owls in the fields and there is a course part of Chester-Meols Roman road which runs adjacent to and beyond the copse. Nearby there is the Mesolithic site (circa 8500 BC) verified by Liverpool Museum and this is signposted on all roads entering Greasby. The lad in this particular area of Greasby should be considered a heritage site and not threatened by the development of up to 534 houses. Although the above reasons for objection are the main reasons, the farmland is on raised land and the surrounding area towards Greasby Village is prone to flooding in heavy rain even though the pasture alleviates the problem. A housing scheme would exacerbate the problem as the existing drainage system could not cope with the surface water and the two adjacent roads (one basically a lane) would be inadequate for additional traffic. Simply state, the surrounding infrastructure is not there and its provision would add significantly to any development costs. If the drive is for affordable housing this would not be delivered by any developer on this land (re Upton Pines Development where houses are circa £300 to £400). It would be expensive housing provided at the expense of destruction of open space that has significant biodiversity, historic value, valuable flora, fauna and wildlife. Finally there has been significant development in Greasby Village for several years and the village is now in danger of merging with Saughall Massie, Upton and Irby. Some villages on the Wirral are losing their identity and this surely not the intention of the greenbelt review. It seems we do not even know how many homes need to be provided s the assessment methodology is non-specific.</p>
DOR00195	<p>I am writing to strongly object to Wirral Council Plans to release Wirral Green Belt for building houses. My reasons are as follows: ● Wirral already has a very large built up area of 43%. ● Wirral is ‘water locked’ on three sides and so can’t expand outwards. Our nearest neighbour Cheshire West is only 10% built up, England as a whole is 10.6% and the UK 6% - the fact that our area is so much more built up makes our Green Belt even more valuable to Wirral residents and visitors than when designated, as part of one of only 15 English Green Belt areas, over 50 years ago. ● The five stated purposes of green belt. Every one of these purposes is relevant to all of Wirral’s Green Belt and they are as compelling today as when set up over 50 years ago, perhaps more so. Green Belt also provides the following additional benefits: 1. Fresh air, open space and views, trees, hedgerows, plants, biodiverse wildlife and ancient footpaths – assets that are proven to be healthy and beneficial to Humans, physically, mentally and socially. As we are ‘water locked’ these assets take on even more positive significance and all the more reason to preserve them for ourselves and future generations. 2. Historic, rich and productive farmland that produces valuable food for local and national distribution – even more important post Brexit. 3. An attractive and unique landscape that undoubtedly helps draw visitors to Wirral providing quantifiable economic and employment benefits. 4. Areas that are subject to much less vehicle emission/urban pollution (e.g. light, noise, litter) within a relatively wide central North/South corridor that allows wildlife to thrive and stay away from built up areas. The Secretary of State wrote to Wirral Council (23rd March 2018) stating that Wirral “is not an area of high housing pressure”. This damns the subsequent claims of Wirral Council’s alarmist projections for future housing need and begs many questions as to possible agendas and/or competency. During many of the years since 2001 Wirral has experienced a net outflow of population with a small overall increase of just 2% from 2001 to 2018. Future Economic and population growth is likely to be more or less stable, based on recent historic data and observation, mainly due to the fact that Wirral is mainly a commuter belt for many parts of the</p>

DOR REF	RESPONSE
	<p>North West. Stability is something that we should be proud of and defend robustly as opposed to giving away irretrievable assets upon the fool's errand of ever increasing economic growth. Due to being 'water locked' Wirral has only two main exit/entry routes for the large numbers of commuters who choose to live here – the Mersey Tunnels to the North, which are natural constrictors of traffic flow, and the main routes through the South consisting of the M53, A41 and the Chester High Road which are heavily used and often constricted/gridlocked at peak times. Additional housing of the scale proposed by Wirral Council will produce an unsustainable increase in vehicles that will cause chaos, pollution and a much poorer standard of living for all. Wirral is operating at maximum capacity now if we consider peak traffic on these arteries and their feeder roads. There are absolutely no circumstances identifiable now, or in the foreseeable future, that can be remotely considered to be 'exceptional' in order to justify releasing any more of Wirral's Green Belt. There is a need for affordable housing for first time house buyers that can ideally be built on the many 'brownfield' sites in Wirral - regeneration in areas that are currently neglected yet have all the necessary services in place or easily reached – but many fewer homes than the already discredited numbers produced by Wirral Council. This may not be as nearly appealing to the rapacious national building companies, which are currently salivating at the thought of easy pickings from Green Belt, but we are neither here to serve them nor their shareholders. We, the residents and taxpayers, are the shareholders and caretakers of Wirral. We recognise that what remains of the green lungs of Wirral has immeasurable value. We recognise that which those with foresight saw over 50 years ago</p>
DOR00196	<p>This letter is to object strongly to the Council's proposal to allow building on green Belt land. The Council did not provide a Local Plan within the considerable time scale allowed and as a result, have been forced by government to produce a Plan in haste. The Council have proposed a set of figures for housing needs that many well informed people/organizations with planning knowledge think are wrong. It appears the Council are using the Green Belt as an easy way to produce a Local plan to satisfy Government. Wirral Green Belt could be slashed by 50%. The Council's figures for housing needs are exaggerated. Also, the Council is not taking into account potential housing provided from a variety of sources e.g. Wirral Waters, Brownfield sites, planning already approved etc. National Green Belt Policy is to prevent "urban sprawl and encroachment onto the countryside". Our Council SHOULD enforce this policy and as a result should NOT allow Green belt land to be built on.</p>
DOR00197	<p>The Oxford Drive area (SP072A) is a small mature development surrounded by agricultural land and to extend this estate would affect the agricultural land and spoil the open aspect of the green belt. Thornton Hough is a very special village with its own unique character and large scale build would change this drastically. This must not be allowed to happen. Over the whole of Wirral I believe there are already 4,000-6,000 empty units already available for development without it being necessary to make use of areas in or bordering on green belt land. I therefore reiterate my objection to any proposed developments in the immediate area around Thornton Hough or indeed on any green belt land.</p>
DOR00198	<p>Why Sub-Parcel SP010A (Greasby Copse) should not be released either wholly or in part from the green belt. According to local rumour, only the field at the south-west of site SP010A (bordered by The Close, Rigby Drive, Greasby Copse and Our Lady of Pity School) is being considered for release from the Green Belt. If this true, the resident who would be affected should have been informed well before the feedback deadline on 26 October 2018. There is no mention of a possible partial release of SP010A on the Council's website and documentation or in letters sent by the Council to residents on 3/9/2018. This field must not be sacrificed to 'save' the rest of the site. 'The area of very good quality land (Grade 2) is found on the slightly higher land in the western part of the site', 'the site is climatically Grade 1', 'Land of very good quality (Grade 2) occurs in the western part of the site' (ALC Report, June 1998). Good quality agricultural land is needed for food production now and in the uncertain future. The new Agriculture Bill makes this clear. Greenhouse Farm is a thriving concern, much appreciated by residents since its inception in the 1960's. None of its field should be released from the Green Belt.</p> <ul style="list-style-type: none"> • Greasby Copse is a Core Biodiversity Area. A 'buffer zone' around it would do little to protect its wildlife, trees and plants from the effects of so many new households e.g. predatory pets, bored youths. Nearby is a Mesolithic site and traces of the Chester-Meols Roman Road which follows the hedgerow down to Barker Lane. Of all the Greenhouse farm fields, the south-west field is nearest to the Copse. • The site is on an incline and new houses would look down into the back gardens of existing properties on Rigby Drive, particularly those at the upper end. Because of their elevated position the new-build houses would be an eyesore obscuring the view of the beautiful Copse from Hall Drive, Barker Lane and all around. Wirral Council refused Planning Permission (APP/98/05749) for a phone mast (19n February 1999) citing 'disturbance and loss of important flora and fauna, visually obtrusive and out of character with the surrounding area'. Why would a housing estate now be acceptable? • According to Wirral SHLAA2017 the optimum walking distance from housing estates to a high frequency bus route is 400 metres or less. The nearest point of Site SP010A is over 800 metres from the nearest 437 bust stop. • It has not been made clear if and where the site would be accessed from Rigby Drive. • Development would put more pressure on local schools and doctors' and dentists' surgery, would bring traffic congestion, noise and disturbance from building work plus loss of amenity and open space. More expensive infrastructure would be required. Green spaces are vital for residents' health and well-being. • The surrounds of SP010A would no longer be so attractive and existing properties could lose value, causing great distress to hard pressed elderly long-term residents and to families faced with negative equity or needing to move home to take up employment elsewhere. Greasby is already taken its fair share of development and is now a sprawl of housing estate around parade of shops. What little is left of its rural aspect must be saved. Keep sub-parcel SP010A in its entirety in the green belt.

DOR REF	RESPONSE
DOR00199	<p>1. Wirral's housing and employment needs were estimated and dictated by Central Government. However, in its Local Plan, Wirral Council does not consider sufficiently the adverse effects of proposing to build on green Belt land, nor does it pursue all avenues of using Brownfield sites, foremost at Wirral Waters. In fact, the housing needs were scaled down recently, to almost half the original figures, as Wirral's demographic and economic trends had previously been overestimated. In addition, the owner of Wirral Waters (Peel Port) has now shown willingness to release some land for house.</p> <p>2. I therefore urge the Council to remove all proposed building land allocation from the Green Belt and to re-affirm the original objectives behind the creation of Green Belt areas – to protect and safeguard countryside areas between settlements.</p> <p>3. Wirral being a peninsula, surrounded by open water on three sides, there is limited scope for growth in terms of more employment and housing space. The densely populated eastern side of Wirral along the Mersey needs open areas. These are provided by the central belt and the western pockets of Green Belt. These open stretches of land, including the corridor east of the M53, allow for informal recreation, on the quite generous provision of footpaths and in country parks. They must be retained in their integrity.</p> <p>4. Much of the Green Belt is high-quality farm land, has high landscape value and contributes to biodiversity. We cannot afford to sacrifice productive farm land when more, not less food is needed and as much as possible should be produced locally. It must be recognized that once good agricultural land has gone, it is lost forever. Although Green Belt is not a nature conservation designation, by being open land it helps to retain areas rich in wildlife, whether it covers farm land, woodland, meadows, hedges, heathland or water bodies. Trying to retain or recreate comparable biodiverse, habitats within housing or commercial developments is difficult, costly, often impossible.</p> <p>So keep Wirral's Green Belt as well as the wildlife-rich areas outside its boundaries.</p>
DOR00200	<p>We are lodging an official objection to the building of two-storey buildings directly at the end of our garden. Whilst we understand that there will be gardens separating the properties, the fact that these new builds will be two-storey properties means that the whole part of the back of our bungalow will be overlooked. We moved into this property in 1995 with the sole intention of it being our retirement residence. We have made improvements in order to make this happen before we retire and also have installed solar panels on the roof. With the solar panels in mind a two-storey residence within the back boundary will severely inhibit the production of these panels as they will cut out the sunlight in the mornings in particular and we would lose money in the process. Why the need for the building of these properties on this site is beyond our understanding, when there are other areas in Pensby that would be better, and could accommodate a larger amount of houses, for example the playing fields of Pensby Boys school which is now defunct. This, in our opinion would be a better proposal rather than building two-storey properties, especially overlooking all the retirement bungalows on the right hand side of Copeland Close affecting 13 properties in total. Whilst we understand the need for 13,000 affordable houses to be built within the Wirral area by 2035, why is it necessary in our village therefore creating more traffic on Fishers Lane which is busy enough as it is now. We have counted the allocated parking areas which come with the proposed properties and it equates to 70 cars as extra traffic along our roads. This is second time that we have written to object to this proposal and would appreciate if this matter could be shelved permanently. Surely it is not necessary to build on these fields. A better proposal would be to allow the existing community to use the fields for its children.</p>
DOR00201	<p>We wish to make the following comments:</p> <ol style="list-style-type: none"> The sacrifice of nearly a quarter of Wirral's green belt appears to be unnecessary in: <ul style="list-style-type: none"> The context of the number of houses required: The available brown field sites (particularly in Wirral Waters) are not being fully exploited. The projected reallocation to housing required for 12,000 homes, at approximately 6 dwellings per acre, would require only 500 of the ca.17, 000 acres identified in the options report. At 15 dwellings per acre, the average in the Wirral proposed housing allocation, only 80 acres would be required. The criteria for selecting land for reallocation run counter to the Council's duty to prevent urban sprawl. Green belt land already surrounded on three sides is the most vulnerable to the extension of urban development, leaving the area without any green space. If encroachment on the green belt is ever required, it has to be separate from existing built developments. <ul style="list-style-type: none"> The consultation process currently being undertaken is invalidated by the lack of clarity in the materials published. The documentation is disjointed and difficult to navigate, with cross reference between them and the textual information and the maps handicapped by the dual reference systems of SHLAA and SP numbering. The documents are not clearly described and no indication is given as to their purposes or how they will be applied. The Council website is badly organized so that, for example, there are two 'Development Options Review Documents' beneath 'Local Plans' >> 'Core Strategy Local Plan'. They link to different documents. Which list is presented depends on the links followed to reach the page in question. Both seem to contain relevant information and cause confusion because it is difficult to view them together or to establish what is actually applicable. The decision by the Council, in 2017, to establish a joint venture company for development on the Wirral appears to create a conflict in interest. The need to attract and reward a development partner and generate revenue for the Council seems to drive a prejudice in favour of appropriating green field sites from green belt land over exploiting existing brown field locations. While it is clear that council needs to encourage development on the Wirral, it also has a responsibility to conserve the environment for the future. The conflict between the roles of developer and regulator cannot be properly managed unless there is an independent entity that decides between them, responsible to local people and this will not function properly if the council undertakes both roles.

DOR REF	RESPONSE
DOR00202	same as DOR00201
DOR00203	<p>I do not believe the Local Plan has been positively prepared and derived in an unbiased way that is based on fact. Analyses on the need for the housing amounts required are flawed, overestimated by approximately two-thirds and therefore render the need to utilise Green Belt land, rather than brownfield land, spurious and ill conceived. Consequently, the Local Plan is inaccurate in determining the actual local needs for housing, land for businesses, community facilities, infrastructure (e.g. for transport, water, energy), education, shops, facilities for sport and leisure etc., which should have been identified through the studies which make up the evidence base. The Local Plan has been rushed through, as evidenced by the well-publicised debacles over its preparation, accusations of corruptive practices and the history behind its late submission. The chosen strategy of the Local Plan lacks justification and has not been shown to be the best one compared with the consideration of viable alternatives. For example, it is totally unclear how the Sustainability Appraisal has informed the Local Plan. The emphasis on utilising Green Belt land in the Local Plan flies in the face of Sustainability and therefore requires particularly rigorous justification: such justification is sadly lacking, especially in the light of flawed statistical analyses of needs. The Sustainability Appraisal report should set such justification out and can help compare alternative options: this has not been done. The Local Plan has not been prepared with sufficient participation of the Local Community and is clearly not founded on ample and accurate evidence. It is not backed up by well-established facts and cannot be justified or relied upon in its direction or determinations. The Local Plan is incomplete and lacks efficacy. There is no information on how the Plan will be delivered during its lifetime and it lacks any clear and comprehensible 'implementation plan'. Delivery partners (e.g. strategic highway authorities, the Environment Agency, water companies) are not signed up to the plan. There is no indication of when sites will come forward and the developers and their ambitions are opaque and nebulous. It is unclear how the Local Plan will be monitored. The Plan shows no sign of flexibility and would be unable to deal with changing circumstances (e.g. what if a big site doesn't come forward for development when expected). The Local Plan is inconsistent with National Policy as set out in the National Planning Policy Framework. It fails to reflect national guidelines on the use of Green Belt Land on all five counts. For example, it lacks sufficient justification to utilise such a precious resource as Green Belt land when viable alternatives such as available brownfield lands have not been adequately considered. Whilst it is acknowledged that the proposed use of this land is still under investigation according to the Local Plan, it is unclear why this is not already complete and included in the Local Plan. Why is this? Please reply in writing. Mention is made of the 'protect' category of Gayton Park, but this is not reflected on the Map of the pertaining Green Belt Site within the Local Plan. Gayton Park and its status as part of a Sport Covenant is not mentioned, nor the position and boundary of Gayton Park properly delineated and marked as an exclusion to the Local Plan. There is a distinct lack of clarity of what land is actually being proposed for use and development in terms of Green Belt. Please send me clarification in writing and amend the Local Plan accordingly. The bottom of Gayton Park at the Broadmead end is extremely wet and boggy. This used to be the site of ponds in the past and the topographical fall from the Chester Road increases water run-off into the bottom corner adjacent to the termination of Broadmead. The water table has been added to in this area by the more recent addition of a drainage system from Heswall Football Club. This has exacerbated the waterlogging, as no provision was made to improve an outlet for this additional run-off. If future development is planned, it should be recognised there will need to be adequate investment made to improve environmental drainage from this area with consequential expansion and amelioration of services to accommodate increased water flow and efficient hydrological dispersion. Has this need been factored into development costs for proposed future use in the SP071 portfolio? Please provide a written reply</p>
DOR00204	Same as DOR00177
DOR00205	Support for land West of Riveracre Road, Eastham. I have been a Wirral resident for my whole life. I've come to the point in my life where I'm now a mum. I feel Wirral would benefit from more affordable family housing. Especially for a first time buyer like myself with a small child.
DOR00206	Support for land West of Riveracre Road, Eastham. I need a new house and I'm happy to move soon in Eastham Support for Land west of Riveracre Road's inclusion in Local Plan. I believe in that land.
DOR00207	Support for new homes on land west of Riveracre Road, Eastham. I fully support the use of this land for family houses. People do not always want apartments on brownfield sites. This area has good access links to motorway so congestion should not be an issue.
DOR00208	Support for new homes on land west of Riveracre Road, Eastham. We fully support the building of this Estate [Petition in favour of development attached]
DOR00209	<p>We write to express our disagreement at the use of green belt land for building on the Wirral. Brownfield sites must be exhausted before Greenfield is even considered and also the empty properties in Wirral (in the region of 6,000) should be brought back into use. Affordable housing is definitely required in the country as a whole but as we all know building on the majority of earmarked sites on Wirral will not be "affordable" for first time buyers and if it is proposed to "bring in" so many extra people to the Wirral where are they to be employed, certainly not on the Wirral - public transport is limited and time consuming as well as costly to say Manchester. Also we do not have the infrastructure to cope with extra traffic on the roads - at the moment we have traffic queuing up to exit the motorway at junction 4 onto roads totally unsuitable for heavy traffic (A5137). In Barnston village the dale is totally unsuitable for any large increase in traffic and further housing on/around Barnston Road would cause absolute chaos - it is a very busy highway now, especially at rush hours. Services in the Heswall/Barnston area are already under pressure - Doctors surgeries seem to be unable to cope to an acceptable level with numbers of patients - hospitals are continually under pressure - there is now no Police station or Fire station in Heswall - where are the vital services to come from to cope with the extra houses proposed.? Surely the Wirral should not be considered in a national approach to housing as it is unique in the country in as much as it has water on three sides and is narrow (7 miles wide). We would question very strongly as to whether in fact 800 houses per year are necessary as the population has decreased over the last several years. Employers such as Unilever now have far fewer employees than they had fifteen/twenty years ago. Have Ministers sitting in London any real idea of our small peninsular? We would strongly urge you to put</p>

DOR REF	RESPONSE
	forward. Our disagreement to using so much greenfield land for building as it would change our beautiful environment for ever. Instead of communities such as Thingwall, Barnston, Pensby and Heswall we will have one large urban sprawl with roads snarled up with traffic and no countryside which is totally unacceptable.
DOR00210	I wish to place on record my objection, specifically Proposed Green Belt Site - SP010A. The plan detail looks for the development of this area with an alleged 550 homes on what is currently green belt protected land and a site of local interest. The area identified is also within a conservation area for the Greasby Copse. The development outlined would simply clear the area of agricultural activity and protected land. The development also raises serious questions for the surrounding infrastructure to handle additional residences, increase in transport, schools and environment elements. The existing infrastructure is insufficient to handle greater volumes with limited space for expansion. The proposed site was a contributory factor to the 2014 Moreton floods when a severe downpour caused excess water to enter the culvert and merge with Arrowe Brook. The development of current green belt land will increase the run off of water and increase the potential of floods. In addition the run-off water will increase the risk of flooding to Arrowebrook Farm. The development will also considerably alter the appearance of our land. The introduction of fencing will see the removal of hedges and associated natural inhabitants. We have a wide range of animals from Foxes, Rabbits, Voles, Pheasants, Hawks, Owls and a variety of birds that use and rely on these environments. Finally, Green House Farm has been farming the proposed for a number of years offering a range of services to the local community. The proposed development will close this local and family business from the landscape along with the associated benefits.
DOR00211	My first point is to question the need for extensive future residential building in the Wirral. Developers will be wary of this and Peel Group have indicated only a limited interest in the near future having considered market forces. I am sure that you must share these views. There is also a limited number of employment possibilities in the Borough. Liverpool is completely the opposite with a large demand for housing and this is the case in many areas of the UK. Central Government should be made fully aware of our particular circumstances. Our green belt is unique and important to tourism and it would not be appropriate to reduce it. We are very close to confirming that the Battle of Brunanburh in AD 937 took place in the Wirral. This was historically important. The success of this investigation would be very important for Tourism in the Borough with the prospects of a Visitor Centre and Battlefield “trial”. We are mapping out the site of the overall battle which continued over a large area and indicated by local folklore, field names, “finds” and geographical features which were related in the “Anglo-Saxon Chronicles”. This area would include parts of Clatterbridge, Brimstage, Barnston, Prenton and Storeton. Finally I must draw your attention to the wording in the document “National Planning Policy Framework” issued by the Ministry of Housing and Local Government in July 2018 contained in paragraph 16 on pages 54 and 55.
DOR00212	With reference to the land of Seabank Road for economic growth. I leave my house every day at 7:20 a.m. And it can take me 15 mins. To get going out on to Telegraph Road due to the amount of traffic coming on to the High Street from lower Heswall which is a nightmare and any further traffic does not bear thinking about. We do not need any more traffic to this already very congested roads.
DOR00213	I have been living in Napps Way for 31 years. I suffer from mental health issues including agoraphobia, therefore my home is my life. I have enclosed a photograph of the view from rear of my property. I am confined to my home 95% of the time. I watch the farm (Carnsdale) being farmed all year. I watch the livestock and wildlife. We have several birds of prey, owls, bats and dormice. The other thing that concerns me is the number of mature trees over 100 or more. Not to mention the miles of hedgerows which were only replanted a few years in some parts. I watched the R. Ho. Michael Gove talking on Andrew Marr show in which he said he wanted to keep hedgerows, trees, etc. for the safety of the environment. Why are Wirral Borough Council thinking of building on farmland. There are plenty of brownfield sites. Not to mention Wirral Waters which is owned by Peel Holdings [Attachments of many individual documents circulated to residents by various interest groups in the Borough]
DOR00214	I write to voice my concerns about Green Belt development. As ONS has published revised figures and it is obvious that WBC's growth predication are incorrect, surely it is time to revisit the issue. Please halt this unnecessary reduction of Green Belt that is there for the benefit of generations past, present and in the future. we are all custodians of this precious peninsula and should act accordingly
DOR00215	I write in connection with the above proposed green belt sites. I wish to object strongly to this proposal in this location. In-filling could ruin the character of the village, loss of hedges (a route for wildlife between different sites) and trees (loss of natural habitat for wildlife). The effect of drainage, as it will end up covered in concrete or tarmac. increased traffic, not just in the village but also its junctions. How do you intend to drain the land, as at the moment it will be self-draining, once houses, driveways and roads are built on it, where will all the surface water drain to? The extra traffic from these houses will be a massive increase for the village. Then there is the construction traffic, the village is not built to handle construction traffic, are we talking multiple lorries and trucks every day. Where will the contractors and staff going to park? Finally, please note then there is the effect it will have on a conservation area.
DOR00216	Same as DOR00177. Additional comments: What about all the related needs? Schools, Roads, Doctor Surgeries, Dentists etc.? This would increase Saughall Massie's population by what? 100. Where will all these people work?

DOR REF	RESPONSE
DOR00217	<p>I attended the consultation during which there was almost no mention of the Hoylake Golf Project. Given the impact such a scheme would have on the local environment, I feel this was a serious, if not an intentional, omission. I think it is fair to say that many people would have attended the meeting for that reason alone and that these people would also be aware of the impact we are having on the atmosphere of this finite planet. One of the most damaging things we can do as humans is to climb aboard an aircraft, thus putting detritus into the atmosphere, where it will cause most damage. That is precisely what Wirral council will encourage by persisting to doggedly promote (at huge tax payer's expense) the Hoylake golf project. In addition to the above, there is the almost permanent shadow on the horizon, which successive governments have not only refused to deal with but have actively encouraged, and that is immigration/invasion. The rate of this has placed intolerable pressures on housing, education, the NHS, employment and transport. Some areas of London endure worse conditions than Dickensian society, with massive overcrowding, slave gang masters and people trafficking. The projected number of immigrants this year alone is in the region of 600,000, which in the short time of three years, makes almost two million, which is enough to consume all the green belt in the country and is almost the combined population of Liverpool and Manchester. In view of this, your efforts to accede to government directives are profoundly futile, because the problem is stratospheric and is not going to even begin to recede until independence day on the 30th March 2019. Whenever we see large scale environmental injury, which is what this council is proposing, we will also see subversion of democracy. These things go hand in hand, they always do</p>
DOR00218	<p>I would like to add my objection to the proposals to alter the Green Belt in and around Eastham Village. My reason for moving here a few years ago was because in spite of previous attempts at alterations, the Village still had the feeling of a very old village with a community to suit, that combined to preserve history and to remind us what it was like living in this part of the world in the past, as far as I can see your plans are completely the opposite to the original provision for a green belt in and around Eastham..</p>
DOR00219	<p>There are a number of ecologically important sites that are up for consideration for development in Wirral. The most affected sites are Dibbinsdale Nature Reserve and Red Rocks, Royal Liverpool Golf Course (but I've been led to understand that these sites have been included because of the way a Green Belt reviews works). There are over 70 Sites of Biological Importance in Wirral but it appears that the most affected sites for proposed development include Storeton Woods, Harrock Wood and Eastham Country Park. These small areas of woodlands are home to legally protected species such as bats, and species of conservation concern such as barn owls, toads, and a variety of other bird species and flora, such as English Bluebells now endangered. Other wider environmental concerns for building on our green belt and SSSI sites include loss of high-quality farmland in a time of climate change which is already having adverse effects on our wildlife such as bees, our food supplies, increased air pollution, and risks of increased flooding. I understand the projected housing development numbers put forward by WBC do not match the population levels of Wirral; Wirral's population can be considered stable (in fact, it's slowly decreasing). Isn't this why schools such as The Dell Primary School and Rock Ferry High School, an asset to the community, was closed down and demolished (unless there was another reason not openly put forward to the community)? Basic research shows that Wirral already has over 50% of its land developed, should further development take place, that figure is set to rise over 60%. In areas where tourism has a hold insensitive development would harm what precious little tourism Wirral has. Furthermore, there are no major industries in Wirral therefore there is no rationale for the 800 per year building quota that WBC puts forward. In the light of the housing 'crisis', it is appropriate and expected that brownfield land should be developed first and there is enough in Wirral to fulfil the quota of houses thus far required. Peel Holding's Wirral Waters project would go a long way to closing the numbers gap. It is also common knowledge that green belt land will be developed for the luxury market leading to more land depletion for wildlife. Wirral, sadly, is already a region low on species diversity, therefore development on wildlife corridors must be taken into account. Biodiversity has declined globally over the last forty years. In the 1960's Rachel Carson pointed out to the decline of species due to poor agricultural practice and that decline has reached the Rubicon; it is now almost irreversible. Many of us are, against the odds, trying to mitigate further decline of species, but this can only happen with more trees and open spaces to off-set rising carbon and help species recover. New gardens will not be a significant help as fences, concrete posts and driveways block corridors for wildlife to hunt, feed, breed and survive; an example is the hedgehog, which, according to the British Trust for Ornithology calculates Britain has lost around 30% of this beloved mammal, equating to fewer than a million hedgehogs left in the UK today. Tragically, we are losing hedgehogs at the same rate as tigers are globally - at around 5% a year, both in rural and urban habitats. In Wirral, an East/West economic divide exists, with residents on the East side suffering some of the worst poverty in the United Kingdom. In Eastham, local school children compiled a project into pollution in the surrounding area. They found high levels of noise pollution, air pollution from automobiles and aviation and Eastham and Ellesmere Port oil refineries. A more consistent study was carried out by Mersey Forest and they calculated that every £1.00 spent on open space was worth £7.00 in savings to the NHS, an important consideration that cannot be ignored in these NHS cash-strapped times. If our Green Belt and special places are lost or reduced, the wildlife goes with it and our sense of place and purpose. A reduction of trees will equal more carbon, creating an unmitigated disaster. All life on earth is experiencing the sixth mass extinction due to human pressure and global climate change. WBC cannot afford to be idle or complacent in the face of such an urgent crisis.</p>
DOR00220	<p>same as DOR00219</p>
DOR00221	<p>I am totally opposed to the Government's top down plan for solving the UK's housing needs and in particular those affecting the Wirral. I object to the use of any greenbelt land which would significantly harm the character and appearance of the area. The pole tax was defeated. The dementia tax was defeated. The housing growth plan should be defeated in the same way. I fully support your policy of firstly using brown field sites but fear that now that developers know green field sites have Government approval then this is what they will wait for and insist on. Unfortunately my house is in Thingwall Road next to the proposed development site. I am advised that my house is now unattractive to a buyer looking for a Wirral lifestyle and by publicly publishing these plans have significantly reduced its value. Whatever happens I am in a loss-loss situation and so is the Wirral.</p>

DOR REF	RESPONSE
DOR00222	<p>As you are aware Network Rail is a statutory consultee for any planning applications within 10 metres of relevant railway land (as the Rail Infrastructure Managers for the railway, set out in Article 16 of the Development Management Procedure Order) and for any development likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway (as the Rail Network Operators, set out in Schedule 4 (J) of the Development Management Procedure Order); in addition you are required to consult the Office of Rail and Road (ORR).</p> <p>1. Development proposals should be accompanied by a TS/TA which includes consideration of the impact of proposals upon level crossing(s) within the Wirral Council area and with mitigation implemented as required. Network Rail would encourage the council to adopt specific policy wording to ensure that a. The impact of proposed new development (including cumulative impact) on the risk at existing level crossings is assessed by the developer(s), and b. Suitable mitigation incorporated within the development proposals and fully funded by the developer(s). TS/TAs should be undertaken in conjunction with the local highways authority with advice from Network Rail.</p> <p>2. Sustainable drainage proposals should take into account the impacts upon adjacent railway infrastructure, i.e. proposals must not import a risk of flooding, pollution, soil slippage onto the existing operational railway. Sustainable drainage systems within the Local Plan area should be directed away from the railway and should not use soakaways within 30m of the railway boundary. Attenuation ponds/basins on sites adjacent to or near to the railway boundary should only be included in proposals with the agreement of Network Rail and should not be included in proposals that are adjacent to a railway cutting.</p> <p>3. Consideration should be given in Transport Assessments to the potential for increased footfall at Railway Stations as a result of proposals for residential development / employment areas within the SHLAA area. Location of the proposal, accessibility and density of the development, trip generation data should be considered in relation to the station. Where proposals are likely to increase footfall and the need for car parking at the station; the council should include developer contributions (either via CIL, S106) to provide funding for enhancements as part of planning decisions.</p>
DOR00223	<p>I have lived in Greasby all my life and seen many developments take place over the years which have made Greasby into an attractive and thriving community. There is an excellent community spirit with many active groups which have banded together since the appalling decision to build a fire station slap bang in the centre of the village was overturned. We have a good range of shops, an efficient doctor's surgery with caring practitioners and a dentist. It is a nice place for children to live and grow up. I am however now extremely concerned for the future of Greasby. I have studied the proposals to allow green belt land behind Rigby drive and down Hambledon drive to allow additional housing to be built and I AM TOTALLY AGAINST THIS! 1. The land behind Rigby drive is prime farm land that has been successfully farmed by the Appleby family for years. If this land is developed they are out of business and their livelihood destroyed. 2. The area concerned which is, if we have been correctly advised, to have over 500 houses built on it contains an area of woodland that has been there for years. As a child it was always referred to as Hancock's wood but is now known as Greasby Copse. This woodland is home to a wide variety of wildlife and resident and migratory birds. Development of the land will destroy these habitats. 3. Part of this land is of great historical interest. There are hidden there the remains of an old Roman road which extended down to the coast. Sites have been looked at by archaeologists and interesting artefacts obtained. Some of these are on display in The Museum of Liverpool Life. These sites which could be required for excavation again sometime will be destroyed by development. 4. Of major concern to Greasby if the 2 Green belt sites are developed is the knock on effect to the schools, doctors, roads etc. in the area. They will just not cope. Hambledon Drive, and Arrowe Road where it is likely access to proposed new homes will be built are already heavy with traffic throughout the day. Imagine what they will be like with increased housing, and the dangers to children travelling to schools. 5. I do not want Greasby to be joined up by housing to other villages so that its identity is lost and Wirral becomes one enormous town. 6. Peel holdings own large sections of land already in Wirral and have promised to build houses on this land. Why isn't planning permission being granted. 7. There are many Brownfield sites on Wirral. Why doesn't the Council get its act together and obtain orders for these sites to be developed for housing? Why aren't the empty houses in Wirral, prepared for occupation by those in need. If houses are built on the proposed sites in Greasby they are not going to be affordable houses because the land on which they are built in is prime green land which will be sold for a price which will push the cost of the houses up. Wirral borough council appear to have been very neglectful in providing the government with its figures regarding projected housing available in future years in Wirral. It does not make things right by agreeing to allow prime green belt land to be made available to greedy developers and I strongly implore the council members to vote against this. To get the Peel holdings land developed and Brownfield sites used. PLEASE DO NOT ALLOW THE GREEN BELT LAND IN GREASBY TO BE DESTROYED!!!</p>
DOR00224	<p>I have been made aware of the potential future development over the next 15 years for the above plot of land. I would like to object to this proposal for various reasons. Primarily from a personal perspective my main source of light in my garden is from that direction and given my house is already overlooked by the side of an adjacent house, the construction of houses in this area will have a detrimental effect on my light and will therefore affect drainage in my garden which is already bad where the house overlooks my property. I purchased my property based on the fact that there was open land and a pleasant view, building on this land will have a detrimental effect on the market value of my property. From a general perspective, with the increasing popularity of Claremont Farm, Old Clatterbridge Road is already getting busier with traffic and therefore can ill afford increased traffic. In addition local schools, doctors and dentists are already over-subscribed, therefore introducing additional housing will only exacerbate this problem. The plot of land is only a small one and I can envisage that housing would be extremely cramped. I would therefore encourage the Council to consider previous suggestions whereby local residents affected by the building on this plot would purchase the land instead.</p>
DOR00225	<p>I wish to object to the proposed plan to develop large areas of green belt land in my area. I have lived in Heswall for nearly all of my 89 years and don't want to see the green belt land that has kept the individual villages separate as long as I can remember handed over to developers. I would also like to know where the demand is for all the new housing the council/government seems to think we need. It certainly isn't in Heswall and surrounding villages. If the need is in the other areas of the Wirral then build the houses there without destroying our beautiful countryside. I would like to know if builders/developers who have land banked large areas of land on the Wirral have been told to either develop the land now or face having planning permission withdrawn.</p>

DOR REF	RESPONSE
DOR00226	We are writing to object to the above planning proposal. Irby is already a very busy place with significant parking problems and traffic congestion. I feel the building of more houses in the area would have detrimental impact on the local environment, traffic issues and result in the local road becoming more dangerous. The above land is important green belt land and there are more suitable brown field sites for building houses in the area. Irby is currently geographically separate from Pensby, this development will result in the loss of the natural buffer between Irby, Thingwall, Pensby and Heswall which will make the whole area feel like a large town, risking the village atmosphere that Irby currently enjoys. The green belt land of the Wirral is precious and once it is built on it is gone forever. The proposed green belt site SP060 is outdoor space used regularly by local residents for walking and recreation. It is of vital importance that such areas are protected for the health and wellbeing of the local population. Consideration should be given to alternative brown field sites, of which there are many on Wirral, to meet the housing needs of the Borough.
DOR00227	We are writing to convey our strong objections to the release of green belt land for housing development on Wirral. We live in Spital and are particularly concerned about the areas of green belt parcels SP040, SP042 and SP043. Our objections are: <ul style="list-style-type: none"> • The loss of high-grade agricultural land (arable and livestock) and of Claremont Farm and its shop – a great asset to the community. • The impact on the road system, already overburdened, if a large number of houses are built. • The “knock on” effect on local services – school places and GP surgeries, our local surgery is having trouble now recruiting new GP to serve current demand. • Lack of sufficient parking at Spital Station means current demand cannot be met resulting in over-parking in nearby roads. • The visual impact on the environment and possible risk of flooding. We urge the council to exclude these three parcels of green belt from their deliberations.
DOR00228	<p>Proposals on land near to our property are being considered under site references SP060 and SP060B and invites our comments. These are as follows:</p> <ol style="list-style-type: none"> 1. Land described by site reference SP060 (and SP060B) is currently within the Wirral Green Belt. The purpose of the Green Belt is to safeguard the countryside and to check the unrestricted sprawl of built-up areas effectively merging neighbouring towns and villages into one another. Thus, the Green Belt should assist urban regeneration by encouraging development of brownfield and other urban land, of which there is no shortage on Wirral (Wirral Waters owned by Peel Holdings?). To start building large numbers of houses on land described by SP060 would contradict this very purpose in that Irby, Thingwall and Pensby would effectively be merged into a giant-sized conurbation. Irby, Thingwall and Pensby each have their own specific identity by way of libraries, village halls/community centres, shops, post offices, schools, etc. This proposal represents the clearest case we can imagine where losing a package of Green Belt (SP060) would cause three villages/towns to lose their identity. We moved to Irby in June 2015 because we liked it's 'village feel'; we do not want to live in a sprawling, identity-less, conurbation. 2. Harrock Wood is contained within SP060 and belongs to the National Trust. It comprises remnant Wych Elm woodland with other hardwoods such as oak, beech and ash standing alongside Arrowe Brook. Harrock Wood helps to break up the urban environment and gives an open feeling to the area which is much appreciated by the community. It is a key walking amenity for residents and a habitat for much wildlife, some of it relatively rare such as tawny owls. Any development within SP060 will clearly adversely affect this important amenity. 3. As far as we are aware, Elm Road represents the only current road access to SP060 other than from the main Irby Road. More particularly, it represents the only access to SHLAA892; a land package which forms part of SP060 and features in a list (Appendix 9) of greenfield Green Belt sites for possible development in the Strategic Housing Land Availability Assessment Update of 2016. Elm Road serves 10 properties and a further 10 properties in Menlo Avenue which runs off Elm Road (20 in total). Elm Road is only 5.5 metres wide and simply could not cope with any significant increase in traffic. Two modern (relatively wide) cars already struggle to pass and given that some houses have driveways barely long enough to take a car, Elm Road residents often park in the road. Menlo Avenue is even narrower at 3.5 metres and visitors to its residents often park in Elm Road. Thus, Elm Road simply could not cope with any increase in traffic (and will become dangerous), and the thought of site traffic down Elm Road simply doesn't bear thinking about! 4. Finally, we believe that the land package SHLAA892 is unsuitable for development because the land is liable to flood after heavy rain. For example, the attached photograph (1), taken from our front bedroom window, shows the 'dip' in SHLAA892 under considerable flood and rivulets of water running downhill to accumulate in the dip. Also, we have a minor stream at the end of our garden at it's boundary with SHLAA892; similarly, this is liable to flood into our garden after heavy rain (see photograph 2). These are the principal reasons that we believe development on SP060 should not occur and hence we believe strongly that SP060 should remain within Wirral's Green Belt. We ask respectfully that you consider seriously the points that we have made and request that you acknowledge receipt of this letter. [Photographs attached] <p>I have not received an acknowledgement from you and hence I am taking this opportunity to re-submit my response by email. My original letter and 2 supporting photographs are attached to this email. The attached response concentrates on land package SP060 (as your letter of 3.9.18 requested). However, I wish to make a second response about the Green Belt Review in general. The recent statistical release from the Office for National Statistics (ONS) entitled Household Projections in England: 2016-based concludes that the projected increase in the number of households in Wirral from 2016-2041 (25 years) will be 9,871. If you pro-rata this for 15 years, this equates to 5,923, which is less than half of the 12,000 target in 15 years (800/year) currently being used by Wirral Borough Council in the development of its long-overdue Local Development Plan. In the recent Green Belt review consultation meetings, [council officer] reported that the Council is confident of delivering 2,400 homes on brownfield sites and Director of Wirral Waters, Peel Holdings reported in his letter to the Council Leader (10.9.18) that he is confident that between 2,900 and 6,450 units will be delivered within the next 15 years. Thus, the worst case scenario is that brownfield development and Wirral Waters together will deliver 5,300 homes, whilst the best case scenario is that 8,850 homes will be delivered. Surely, with a little bit of give-and-take from WBC and Wirral Waters, the ONS revised target of 5,923 homes in 15 years can be achieved without building on any green belt land. Release of any land will change our environment for the worse, and can never be reversed. Accordingly, I urge that the Green Belt review is stopped immediately.</p>

DOR REF	RESPONSE
DOR00229	<ol style="list-style-type: none"> 1. I attended the public meeting at Pensby school on Wednesday this week and would like to make the following comments. 2. The planning officer who gave the presentation was an employee of the council and I am certain he had been given an agenda he was instructed to follow - as an employee he has to do as instructed. Did the council not have the guts to send a Labour councillor who was not limited by terms of employment. Your projections for population on the Wirral are totally flawed. Your own population projections from 2018 to 2038 shows a growth of just 5,500 or an average of 275 per year. Given that the average family size in the UK as projected by the ONS is 2.4 - to accommodate 275 people just over 100 houses would need to be built per years for 20 years. That is just 2,000 houses in total. 3. My understanding is that what is needed everywhere is affordable houses may to allow young people onto the housing ladder. Your own population figures by age group actually forecast that at every age level apart from the 15/19 group and 40/44 group will fall over the next 20 years. 4. You apparently want to pay an expert to review the figures - money that could be better spent on things like Wirral's roads. You already have an expert opinion from [another respondent]. 5. Your economic forecasts for Wirral are also flawed according to many independent opinions. 6. Any development needs to be made in Birkenhead, Wallasey and along the Mersey. Building on Green Land is cheaper for developers - they are more interested in greed than need. 7. Why has the Council totally lacked the guts to challenge the government? 8. Wirral's Green Belt is a major attraction - it contains much wildlife, clean air and open space for recreation for the present and the future. 9. Much of Wirral is low lying and more building on the Green Belt will increase flood risk. It will also add much pressure to many of the already congested roads and pressure the hard pressed health services. 10. Many labour councillors say they are against building on the Green Belt but when challenged and asked if they will vote against the plan they either do not answer or still say they will support it. This is hypocritical. 11. I believe that the council should work to meet the needs of the residents - but it seems they seem to think they know best. I believe that the best bet is for Wirral residents to vote against the Labour party in all future council elections - I shall do my best to encourage this mood. 12. It is obvious from a number of meetings that there is considerable anger at the council's plans and you just need to listen. Why do I get the sense that all the meetings you are holding is just a 'box ticking' exercise. 13. I also refer you to the enclosed leaflet that covers numerous points. [Leaflet attached with petition to stop building on Wirral's Green Belt]
DOR00230	<p>Thank you for the written letter on where the proposed 12,000 houses by the Labour Council are to be built. My area is SP061 (North of Gills lane) and SP062 (West of Barnston Village) I have lived actually on Gills Lane for 31 years and like most people have seen a vast increase in vehicular traffic on our roads. Many years ago traffic lights were installed at the west end of Gills Lane where it junctions with Pensby Road. This has led to a massive increase of traffic using Gills Lane as a 'rat run' for people travelling from Heswall/Pensby/Irby to get to Levers Causeway and then onto Birkenhead or the Mersey Tunnel (avoiding the Arrowe Park/Woodchurch nightmare). Gills lane is barely coping with this heavy traffic at present and has a number of dangerous bends on it. Coupled with the fact that there is only one minor 1 metre wide footpath which travels down only halfway along Gills Lane (north side) until it meets the horses riding stables and even that small footpath is regularly overgrown with hawthorn hedging. People jog and walk in the actual roadway. To make Gills Lane safe would require the east end of the lane (Barnston Road junction) to be massively widened and a footpath also installed on the north side...it genuinely is a fatal RTC waiting to happen if no footpath travels the full length of Gills Lane. Multiply this by maybe (proposed 504 houses just on the north side alone) an approximate extra 1000 cars travelling to work/school run/shopping etc. (as most homes have two cars) and this will be a major problem that could only be lessened by either traffic lights or a roundabout at the east end of Gills Lane at the junction with Barnston Road. There is a sub power station (on south side and just around north corner) at the east end of Gills Lane as well just to complicate matters. It will be a very costly project to do all these alterations. Gills Lane is also a lovely 'escape route' for pleasure riders, walkers and joggers etc. to enter the greenbelt area and enjoy lovely views and countryside. It is the first area of countryside for those leaving Pensby etc. It would be a travesty to deny these people their right to use Gills Lane for this purpose. Let us keep the views and the greenery that, sadly, has been now permanently removed from Pensby and other local areas. I fear that the utility mains structures underneath Gills Lane would be unable to support such building project of this size? The field (SP061) next to my house regularly floods in winter to over 50 metres inwards as there is a sharp incline from my house to the top of Gills Lane and there is no drainage for the field. I respectfully ask that consideration be given to cancel/suspend building on the Green belt Site reference SP061. SP061 and SP062 are the total income of the local farmer, in fact all the land on these two sites encompass his whole farm totally. [Newline paper attached "Town Hall Greenbelt threat exposed"]</p>
DOR00231	<p>We are extremely concerned about this desire to have to remove vast areas of Green Belt land in the Wirral, particularly in our area of Barnston. The land consists of three farms owned by an Estate and one owned by an absentee landlord who has put the farmer and his family off the land obviously encouraged by statements coming from the Council. To say you have been obliged to do so by the government does not wash. We have a letter from the, Ministry of Housing, who states 'regarding housing numbers, it is for the local authorities to calculate their local housing need based on a standard methodology we have set out in draft guidance'. Had you completed your task of setting out local plan, this would not have arisen. We have been given a very short consultation time, although no doubt, you will say this is the legal requirement, and perhaps you can say why Heswall and Barnston, who have the most to lose, have not been given a public meeting With reference to the Council's totally unnecessary mass grab of Green Belt Land We begin by asking you how you arrived at this figure. Which ' methodology' have you used? (see attached letter). We should ask you how you have reached the strategic market assessment, please, especially when the population of Wirral, along with growth, is in decline, and getting older. Following the Council's</p>

DOR REF	RESPONSE
	<p>failure to produce a Local Plan, the consultants you engaged, no doubt at great expense, have been wildly optimistic about the level of growth in the area and you have accepted their conclusions. Perhaps you will tell us how you arrived at this number of houses because it is not as you claim, down to the responsibility of the Government. Your planning department is in total disarray. If you ring for information or assistance (joke), you get an answer phone service and no one returns your calls. You will no doubt say it is because of Government finance cuts. Others, particularly after sight of a letter from Peel Holdings, would say the department is incompetent and inefficient. We ourselves, have been waiting for four years for a response from yourself relating to Bamston Dale. The infrastructure is incapable of coping with the traffic which would be generated by your proposals. You must be aware of the tailback at Junction 4, M53, each day. And then we have Barnston Road, the main route to and from Arrowepark Hospital emergency services, and of course, Barnston Dale. If you check your records from 2000/2005, when we were fighting to stop H.G.V.s from driving down Barnston Road, without any assistance from the Council we may add, you will see we engaged Singleton Clamp, Traffic Consultants and you will find their report interesting reading and still relevant today. What about the schools and the doctors? Instead of waiting two weeks for an appointment it will be four. Why are you not developing brown field sites? (please refer to letter from Peel Holdings). We all know developers like to get their hands on pristine Green Belt but we need the farmland to continue producing food, especially after Brexit. The landowners (and for most of Wirral) are not being benevolent and thinking people need houses. Any houses built in this area will be expensive and not social housing. Barnston has more to lose than any other area yet we have not been given a public meeting. Why? We sat through your presentation at Pensby School with cleverly, minimum time for questions, none of which received a direct answer. [Letters from Ministry of Housing and Peel Holdings attached]</p> <p>Key Objections to the current proposals:</p> <ul style="list-style-type: none"> • Land may only be removed from the Green Belt in exceptional circumstances. • The proposals fail to meet any of the five Green Belt criteria as laid down in the National Planning Policy Framework. • The proposals are certainly not exceptional. • The Green Belt is enjoyed by ALL Wirral residents – accessible due to the size of the Borough – contributing to tourism and leisure opportunities with access to farming and forests. • Development on the existing Green Belt farmlands will destroy the unique and separate character of existing villages, resulting in excessive urban sprawl. • Agricultural policies, agreed at both national and local levels, are seriously compromised. • Disturbance/destruction of an historic footpath network. Public footpaths, most of which are in the green belt, have huge amenity value. There are three in our area in SP062, SP065L and submitted site 1958 within SP065. Wirral has over 200 miles of highly accessible public footpaths within its 45 mile boundary. • The figures used and assumptions made for housing needs across Wirral are flawed. Wirral's population is stagnant. Using a number of sources, including the Council's own figures, the most credible analysis is that the Wirral population grew from 314,700 in 2001 to 321,238 in 2018, a growth of 6,538 (or 2% over this whole period) which is annually approx 380 people per year. There is little employment in Wirral, other than the service industries. People work in Liverpool, Manchester and Chester. Young people leave the Wirral to seek work. • Existing infrastructure – roads, drains, sewers etc. – barely copes with current demand. • Barnston Road is a Council-designated Accident Route. • The 1975 Act recognises the catastrophic effects of any serious incident at Thingwall Reservoir. • All of the primary schools in West Wirral are full to capacity in either all or some of the year groups. <p><u>Brief background</u></p> <p>It is a legal requirement for Wirral Council to produce a Local Plan (Planning & Compulsory Purchase Act 2004)</p> <p>The Cabinet approved development options in February 2017. These options are the subject of the current review which is out for consultation. The Cabinet will then decide the sites which will be included in the Council's Local Plan. This is scheduled for December this year. The Cabinet will be required to:</p> <ol style="list-style-type: none"> 1. Agree the final text of the proposed draft revised Local Plan 2. Agree a final housing requirement in view of the Government's final national minimum calculation 3. Conclude whether the exceptional circumstances necessary to alter Green Belt boundaries have been demonstrated 4. Approve the final list of sites to be proposed to be included for development in the Draft Local Plan; and 5. Authorise the completion of any necessary final appraisals and assessments. <p>Inter alia, the Council is obliged to undertake a review of local housing needs using the Government's method of calculation. Recent assessments of housing need are</p> <ol style="list-style-type: none"> 1. Wirral's Strategic Housing Market Assessment (SHMA) – 2012-based @ 875-1235 p/a 2. The City Region's Strategic Housing & Employment Land Market Assessment (SHELMA) – 2014-based @730-737 p/a 3. Government – 2016-based @ 803 p/a 4. Nb. These figures are now subject to review according to a letter from the Leader of the Council dated 22.09.18, viz: "New ONS (Office of National Statistics) figures published indicate the

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	<p>number of new homes actually required is in fact less than 500 – nearly half the number first proposed.”</p> <p>5. Peel Holdings – Wirral Waters</p> <p>In a talk and presentation by the Development Director for Wirral Waters, Peel Holdings, on 28.09.18, in the question session at the end, he was asked specifically about housing provision within the 15 year future of a local plan. His detailed answer was both clear and positive. He said Peel would complete 1000 dwellings in 3 separate schemes by 2022/3. Peel will produce the remaining 5450 within the 15 year period. These schemes will be continuous and sequential over the period and NOT at the end. There will be NO hiatus. Indeed if economic conditions allow, they will complete the whole 13,000 within 20 years.</p> <p>Mathematically, once the future need is reduced well below 500 per annum, there will be no need to touch any Green Belt land and any attempt to do so would almost certainly be unlawful and could be challenged on appeal and in the ultimate, challenged in the courts.</p> <ul style="list-style-type: none"> • Settlement Area is a Wirral Borough Council construct and has no relevance to Green Belt. A view of Barnston from Google Maps shows that it is a rural village surrounded by farmland. All the land parcels under threat in Barnston are in farmland. Any building of houses within these threatened areas amounts to an extension of the sprawl of large built up areas. • Any building of houses within these areas would have the effect of merging towns into one another, e.g. Barnston and Pensby, Barnston and Heswall, Barnston and Thingwall. • There are 4 farms in Barnston. All are under threat from building upon any of these areas. The Council purports to support agriculture as does the Government. Any building on any of these sites would make that farm unviable, which by definition is an encroachment on the countryside. • 43% of Wirral is built on compared with 6% nationally. The Green Belt is there to ensure no further development onto the remaining countryside. • Barnston is in the Domesday Book as Bernestone which is an Anglo Saxon corruption of Bjorn's Farm. Held by 2 Viking settlers prior to 1087. Thingwall is of course the site of the Viking parliament. The 2 areas remain separate and distinct. Barnston remains a village as shown on the road signs on Barnston Road and Storeton Lane. • The detail and possible use of brownfield sites has been greatly under-played in the Council's proposals. A credible estimate of the number of possible houses to be developed on such sites should be deducted from those proposed to be built on green field sites. • Peel holdings have undertaken to regenerate Wirral Waters in a constant stream of house building over the next 15 years. There will be no hiatus. Over and above this (6,450 dwellings) there are also more than 2,500 Brownfield sites within the Borough at which the Council is obliged by law to look before any consideration of encroachment on to Green Belt. • Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified (National Planning Policy Framework July 2018 para. 136). • What is capable of amounting to Exceptional Circumstances is a matter of law. The mere process of preparing a new local plan is not an exceptional circumstance. <p>NB. The Green Belt land parcels referred to in this document are SP061, SP062, SP063 & SP064</p> <p>The number of houses proposed for these areas is: SP061: 181-271; SP062: 1255-1882; SP063:; SP064: 71-107</p> <p>In considering proposals for development on agricultural land the local planning authority will seek to prevent:</p> <ul style="list-style-type: none"> • The loss of Wirral's best and most versatile agricultural land • The severance or fragmentation of farm holdings • Unacceptable nuisance or disturbance to existing agricultural enterprise <p>Where development on the best and most versatile agricultural land is unavoidable, such development should be directed to the lowest possible grade.</p> <p>Why?</p> <ul style="list-style-type: none"> • Data proves that agriculture is still of considerable significance in terms of its impact on the economy of Wirral • Post BREXIT, food production will take on an even greater importance; therefore there is a need to retain existing farms. • Policy AGR1 emphasise that national planning policy places upon sustaining the rural economy and protecting the countryside. All Wirral's rural areas fall within the Green Belt. • In Wirral over half of the land used for agriculture is classified within the Ministry of Agriculture, Fisheries and Food (MAFF). Land of this quality is of national importance which should normally be protected from development. • AGR1 seeks to protect land of poorer quality to protect parcels of land incapable of future agricultural use due to fragmentation • Adjacent development disturbance can have operational implications for cropping patterns and livestock husbandry • 80 hectares of the survey area (i.e. the land west of Barnston Road) are currently engaged in Natural England Higher Level Stewardship (HLS) Scheme indicated by the present Government as a progressive requirement in Agriculture post Brexit. • HLS agreements include our references to management of the historic landscape, BCTP, hedgerows and ditches, permanent pasture, arable buffer strips and species rich habitats. <p>The Secretary of State's Strategic Guidance for Merseyside specifically states that development allowed near farms needs to be such as to avoid incompatible land use.</p> <p>The priority attached to the protection of agricultural enterprise in AGR1 reflects the continuing importance of agriculture to the local economy and the special contribution that agriculture makes to maintaining the character and landscape of Wirral's rural areas.</p>

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	<p>Ecology The Bird Conservation Targeting Project (BCTP) produces breeding distribution maps for rare and declining farmland and woodland birds.</p> <p>Historical Landscapes The areas indicated by SP061, SP062 and SP063 would fall within this designation.</p> <ul style="list-style-type: none"> Only c7348 hectares of the HLC type fall into this category across Cheshire. There are approximately 16 hectares of Town Field in Barnston. The field systems have the potential to contain rich habitats; archaeological remains and historic ecofacts. In addition there is the potential for ridge and furrow to be discovered as well as earthworks e.g. HER2 ANCIENT FIELD SYSTEMS These field systems are largely characterised by irregular and semi-irregular field patterns associated with a network of winding paths, tracks and lanes serving hamlets and villages. <p>Retention is encouraged:</p> <ul style="list-style-type: none"> If a boundary is in poor condition, seek to restore If a boundary is in fair/good condition, seek to maintain Relic boundaries should be re-instated <p>To consider developing SP061/062/063/064/065 is flawed by unacceptable infrastructure and health and safety problems.</p> <p>SHOULD THESE PROPOSALS GO AHEAD, THIS WOULD IMPACT ON:</p> <p>1. DRAINAGE and SEWAGE</p> <ul style="list-style-type: none"> Barnston Dale (served by the A551) was formed in the Ice Age and is a steep U shaped valley. The stream in the valley and its unnamed tributaries drain most of central Wirral. The present bridge was built in 1875 The Dale is an ancient woodland with three Sites of Biological Importance First sewer was constructed in c1900. Second sewer running parallel was completed in the 1960s Sink holes associated with original sewer. The streams drain half of SP062, all of SP061 and also Thingwall Following representations by a local MP concerning sink holes and Crosshill Reservoir discharge erosion in Barnston Dale 2013 – 2015, United Utilities were required to undertake repairs to sink holes (some 3 feet deep) in 2015. Some identified problems highlighted during the project reinstatements still remain outstanding. Discharges from Thingwall Reservoir (opened c1918) have caused major erosion The flow from the reservoir exceeds specific limits The reservoir was found to have major construction defects in 2017 and, as a result, the weir (constructed to stop erosion) has been rendered virtually useless The overflow from the sewer treatment plant at Barnston Storm Tanks overflows into a stream and is regarded locally as a serious health risk. There is also an appalling stench! The sewer is near full capacity due to other branches joining it within the designated areas. The A551 already floods by the entrance to the Dale Should high tides and heavy rain combine, serious flooding occurs Brimstage Brook (SP062) is liable to flooding. 60 hectares of potential development within parcels SP062 and SP064 will increase surface water flow to Brimstage Brook which in Brimstage Village and beyond contributes to an existing highest category 3 flood zone. Flow recorder chambers with regulators and storm overflows exist to the rear of Belmont Drive and at the end of Private Drive with additional pump facility at Private Drive to discharge into the Fender Valley Sewer. Sewage treatment is in Birkenhead. Fluvial process has increased in time as greater surface water volume enters Prenton Brook from Higher Pensby resulting in manhole access chambers 78 and 79 being exposed to the full flow of the brook with the potential to cause pollution. Pollution incidence in Prenton Brook will directly impact on the Drinking Water Safeguard Zone and boreholes further downstream in Prenton. Prenton Brook is a recorded river tributary and as such is under the control of The Environment Agency. The predecessor, The National Rivers Authority regularly scoured out the course of Prenton Brook within Barnston Dale to control the fluvial process, this is ignored by EA. Lorries attempting to reach the M53 via the A5137 regularly get stuck under the low railway bridge A second low railway bridge is located in Whitehouse Lane (a much-used narrow link road between Barnston Road and Brimstage Road). The roadway below this bridge always floods in heavy

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	<p>rain. The road is then closed.</p> <p>SHOULD THESE PROPOSALS GO AHEAD THERE WOULD BE FURTHER IMPACT ON DRAINAGE AND SEWAGE WHICH IS CURRENTLY AFFECTED BY THE FOLLOWING:</p> <ul style="list-style-type: none"> · There is lack of maintenance/inspection of the stream for blockage · There is lack of the inspection of the sewer · Inspection shafts eroding into the stream · There is excessive discharge into one of the streams · Sewage related discharge is evident into Prenton Brook · There would be increased likelihood of flooding · Rich ancient hedgerows that form valuable wildlife corridors would be decimated · Wildlife, currently preserved in the Dale including badger setts, would be stranded · Brimstage Brook (westerly SP062) would be subject to further flooding · The reservoir which, apparently in an emergency would need to be emptied. is adjacent to a proposed new development of 504 houses <p>2. ROADS</p> <ul style="list-style-type: none"> · Wirral is a peninsula with water on three sides. All travel to Merseyside and Cheshire is therefore concentrated on very limited and congested routes. · There is factual evidence to identify the additional cars on the roads in areas SP061, SP062 and SP063 with a range of 1658- 2486 using the Transport National Travel Survey and RAC forecast. (NB. The same survey identifies households with “2 or more cars” in which case, the number of additional cars could be well in excess of 3100). · The A551 (Barnston Road) has been designated by the Council as unsafe and has imposed a weight restriction. Articulated vehicles are banned except for access · The A551 has been designated an accident alert route with fatalities over recent years · Due to the fact that Barnston Village has four farms and lanes and road structures on commuter routes, severe congestion and danger is caused on a daily basis now · On several roads , within a space of a less than half a mile, speed restrictions range from 20MPH to 30MPH to 40MPH 20MPH and back to 30MPH & · Traffic counts show high density on the commuter routes through the lanes · Commuters already face long queues at peak times to get to the motorway · The A551 is the main route from Heswall for emergency vehicles to the main A&E hospital (Arrowe Park – also in West Wirral) that serves the whole of the Wirral. (The other very small hospital with A&E facilities is in Wallasey in the North East) · The A551 is a heavily-congested commuter route to Liverpool via J3 of the M53 · The A5137 (BRIMSTAGE ROAD) is a heavily-congested commuter route to J4 of the M53. NB. This junction has been identified as dangerous by the Highways Agency due to the regularity of vehicles queuing to exit at peak times. · Buses are available to Liverpool from Heswall via the A540 and, as a consequence, commuters are already turning parts of Telegraph Road (A540) into a car park where their cars are left all day. (This also applies to many side roads off Telegraph Road e.g. Poll Hill Road, some of which are impassable at times.) · There is no direct train link to Liverpool from Heswall Hills Station <p>Schools</p> <p>All of the primary schools in the designated area are full to capacity in some or all year groups in F2 and KS1, i.e. where schools cannot legally exceed classes of 30 for children below the age of 7 years</p> <p>Where schools can accept over 30 in a class in Key Stage 2, the schools have had to accept pupils over the net capacity calculation – See figures in red.</p> <p>SHOULD THESE PROPOSALS GO AHEAD THERE WOULD BE FURTHER IMPACT ON THE LIMITED CAPACITY OF SCHOOLS AND ADMISSION OF FURTHER PUPILS WOULD PREJUDICE THE EDUCATION OF ALL PUPILS.</p> <p>CONCLUSION</p> <p>The factual evidence in this document is irrefutable. It presents an overwhelming case for the Council to re-think its proposals for this area. Given the much-reduced figures for housing needs, to consider the decimation of Wirral’s Green Belt whilst, at the same time neglecting the much-needed development of Brownfield Sites in North Wirral, beggars belief. The Council’s whole approach to the Local Plan needs re-visiting and revision.</p> <p>Surely we all want the very best outcome from the development programme which could be fully met through raising the profile of North Wirral by providing affordable new housing and opportunities for families, at present unattainable for many.</p> <p>Wirral Council’s Green Belt proposals would lead to a catastrophic “lose/lose” situation for all – residents and the Council – whereas developing and regenerating within Brownfield sites could only</p>

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	<p>lead to a “win/win” situation for all.</p> <p>Feelings are running very high throughout Wirral regarding this appalling situation which residents will not accept and will take every opportunity available to express the strongest possible opposition over whatever timescale is necessary.</p> <p>Finally, the recent climate change conference in Seoul highlighted the urgent need to maintain green spaces and trees – not eradicate them – and pointed out that it is incumbent upon everyone, from Governments to individuals, to act NOW. Wirral Council should certainly be taking this into account for a plan stretching as far ahead as 2035.</p> <p>Barnston Conservation Society wishes to pass on the serious concerns of both the membership of the Society and non-members who have approached them with reference to the Development Options Consultation.</p> <ul style="list-style-type: none"> • The overwhelming concern expressed by many that Wirral Borough Council is even considering an alteration to the Green Belt boundary. • Frustration by many that the information given by Wirral Borough Council on the website is confusing, poorly set out, and not fully informed. • Disbelief that Local Councillors were unable to answer questions from the public during Public Meetings. <p>Despair that Wirral Borough Council has been unable to provide the Consultation with reliable, proven figures, for Economic Growth on Wirral and thus a correct projection for new homes Our conclusion is that the Development Option Consultation is based upon premises which are fundamentally flawed. To repeat what is said in the accompanying submission’s conclusion “The factual evidence in this document is irrefutable. It presents an overwhelming case for the Council to re-think its proposals for this area. Given the much-reduced figures for housing needs, to consider the decimation of Wirral’s Green Belt whilst, at the same time neglecting the much-needed development of Brownfield Sites in North Wirral, beggars belief. The Council’s whole approach to the Local Plan needs re-visiting and revision”.</p>
DOR00232	<p>In regard to a potential Infill Village in the Green Belt near our property at Barnston Village and Woodlands Drive, we oppose the plans for the following reasons:</p> <ol style="list-style-type: none"> 1. A development of this size will alter the whole character of Barnston Village. The village lies within a conservation area and any infill would dwarf the essential character of the village , one of the very such villages left in Wirral. 2. The infill housing would also be out of keeping with the residential area proposed. Currently, Storeton Lane is characterized by large detached properties removed by distance from the road. The development would be out of keeping with the existing housing. 3. Storeton Lane is a very busy road, especially at the start and finish of the working day. It is the main feeder road for traffic from the Heswall and Pensby areas through to Birkenhead and Liverpool. Currently, during the rush hour, traffic queues can extend as far down Storeton Lane as Barnston Dale Centre. The narrowing of the road due to the listed building causes this. A large development bringing extra traffic into that area of Storeton Lane will only exacerbate the difficulties. 4. There is no footpath through the narrow section of road, which already is a hazard to pedestrians. This will only increase with a large number of new properties there, many of which, presumably, will have children. This will add considerably to the dangers pedestrians face. 5. Barston Dale is a site of special interest with an efficient woodland there. It would be hard to imagine that there will be no impact on the Dale, given the intended development will be so close.
DOR00233	<p>I am completely opposed to building on Green Belt land on the Wirral as there is already sufficient land on brownfield sites to accommodate the 12,000 new homes required by Central Government. Peel Holdings have said on their website, which was recently updated on 7 August, “Locally we recognize the role Wirral Waters can play in the delivery of any local housing strategy and the importance of brownfield developments in reducing the pressure to build new homes on Wirral’s green spaces. We and our partners remain absolutely committed to house building on the Wirral Waters site”. The Core Strategy Local Plan indicates that we are short of brownfield sites, but with negotiations with Peel Holdings, Wirral Council should be able to come to some arrangement to build sufficient homes on these urban sites that have not been included on the Local Plan and do not have planning permission, so a comprehensive survey of available brownfield sites has not been done. The Council therefore falls foul of paragraph 119 of NPPF which says that the council should be proactive in identifying land that may be suitable for meeting development needs. Lever Causeway and its open spaces provide an area for relaxation and exercise for many residents from different parts of the Wirral. To build on this would affect the quality of life for many. The fields around this area are currently used to grow crops. It is unacceptable to build on agricultural land. Green belt land is designated as such for five reasons. The first one is to check unrestricted sprawl of large built up areas. I am particularly concerned about sites SP030, SP033 and SP035 in Bebington. If building takes place on this land, Bebington will just become one large housing estate and the quality of life and environment of this area would change for the worse forever. The second reason for Green Belt is to prevent neighbouring towns merging into one another. If these sites are built on, Bebington would merge into Storeton. This would also go against the fourth reasons for green belt which is preserving the historic setting and special character of historic towns or areas. Storeton is a small village with its own identity. Lever Causeway also has historical significance as a route built by Lord Leverhulme. Sites SP030, SP033 and SP035 are each side of this road. The third reason for Green Belt is to assist in safeguarding the countryside from encroachment. If all of the proposed sites are developed, the Bebington Ward area which presently has 50% of its land and green belt will have no green belt whatsoever i.e. 100% reduction and Wirral South constituency would lose 33% of its Green Belt land. These are totally unacceptable figures. The fifth reason for Green Belt is to assist urban regeneration by encouraging the recycling of derelict urban land. Peel holdings have outline planning permission to build 13,521 homes on Wirral Waters. They have said that they are committed to building on this site. The Local Plan indicates that Green Belt needs to be built on it because of a shortage of urban sites, but there is, in fact, plenty of land to build on this site alone. If you add the brown field sites identified plus the sites that do exist but are not included on the Local Plan, there is absolutely no need to build on Green belt land.</p>

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DOR00234	<p>As residents on Wirral we attended your briefing to residents at Hulme Hall, Port Sunlight Village. After attending this meeting and looking further into the plans and information being provided by the Council with regards to the proposed changes to Green Belt and an increase in brown field or fill in developments we have made the following observations and would appreciate a reply and consideration from the Council. Whilst the need for housing, affordable housing and social housing cannot be denied the use of contaminated sites requires further and additional scrutiny and consideration, examples of toxic developments can be found in the other areas where industrial manufacturing and chemical sites, waste land fill sites have been developed for residential use and are found to be not suitable for purpose due to long term leaching of toxins into garden areas. Further consideration is required to address the local impact that the proposed development of these two sites with a proposed 100 (approx) and 20 (approx) dwellings; also to incorporate the 9 high level apartments already granted planning permission for development on land adjacent 168 Dock Road North SHLAA1041. These dwellings being added to the end of a no through road with additional hazards at the far end.</p> <ol style="list-style-type: none"> 1. TRAFFIC AND VEHICULAR MOVEMENT <ol style="list-style-type: none"> a. All dwellings off the A41 Chester Road/New Ferry Bypass/ Bolton Road East island junction currently have only one entry and exit point on the island; this being the only approach to the island junction that is not controlled by traffic lights. b. To enter the island from Bolton Road East residential area at peak times it is necessary to turn back against the flow of traffic to get onto the island to proceed to three of the exits off the island. This results in vehicles being across two lanes of fast moving traffic as the light sequence is not conducive to assisting ease of egress. c. To enter the Bolton Road East residential area vehicles have to wait on the traffic lights and are frequently backed to the previous traffic lights on the island or have a large part of their vehicle extending into the active lane for traffic going along the New Ferry Bypass. d. There have been at least two occasions in the last year where residents have been isolated with no access or egress to their homes due to incidents where Bolton Road East has been cordoned off by emergency services; Children were not able to be collected from local schools as no one could cross the cordon lines. e. The planned and proposed increase in development for dwellings will result in a potential additional 200 vehicles entering and leaving via the one restricted access route available to all residents off Bolton Road East and Dock Road North. f. In addition to the already heightened traffic and parking problems due to visitors to the Port Sunlight River Park the increasing of vehicles in a one entry closed area will pose an increased danger to all residents and visitors. g. The emergency services are already aware of their difficulties in entering Sparks Croft due to residents parking outside their own homes and restricting access. Vehicles are often forced to park on pavements. h. Dock Road North is already being used by residents as parking due to restrictions outside residences in the area. Particularly Sparks Croft with the restrictions on parking and vehicle types permitted by the developers and leaseholders and restrictions detailed in the property leases. Will the Council be able to assure the existing residents that these problems will be resolved and not exacerbated by this dramatic increase in vehicular activity? Sparks Croft being an example of the high density housing with narrow roads for young working families; typical of the type of developments planned on the two areas being given consideration; where insufficient parking spaces are available and most households have two cars. 2. UTILITIES AND DRAINAGE <ol style="list-style-type: none"> a. There is a known problem with the smells coming from the New Ferry water treatment works. The potential for this to get worse with an increase in the properties feeding this facility should be given consideration to resolve this issue. b. There is a gas collection plant at the end of Dock Road North which is on the boundary of the Land and Marine site and further collection holders adjacent to the Premi-aire site. As these are pressurised workings there is already local concern that the emergency services could not access the area due to parking vehicles. c. The Port Sunlight Riverside Park has the old filter bed remaining as a wetland area for local wildlife. This 'lake' is already above the properties on Sparks Croft and the existing dwellings all have issues with drainage of surface water. Can the council give assurances that full consideration and duty of care will be shown to existing and potential new residents that their safety will be given consideration? 3. MAP used by Council. The map being used by the Council to show planned areas for development and the redrafting of green belt areas is out of date by a number of years as it refers to Golf Range (land adjacent to A41 beside Bromborough Bridge) which is now no longer there but is an almost completed Phase One of a housing development known as Kings Hill by Bellway Homes; with additional homes still being built. The map does show the development on Chester Road Bedford Road area which is a more recent development which is still under construction with more sections remaining to be built on within that development by Lovell Homes. This would indicate that the plans being put forward and discussed are being presented without full and accurate disclosure of the actual situation with regards to the current housing position and the future needs for housing development. The information being presented appearing to be lacking in accuracy in some areas. Can the Council please give confirmation that a more up to date map of existing dwellings and developments will be given consideration, and published as amended to correct in accuracies prior to any plans whether for brown field land, infilling villages, pocket developments or green belt changes being approved?

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	<p>4. TOXICOLOGY and ASBESTOS</p> <ol style="list-style-type: none"> The proposed sites off Dock Road North are in the lea of the Port Sunlight Riverside Park which was previously a land fill site. What affect with the toxins are potentially continuing to leach from the area and will do for many years. There are already issues with planting alongside the Premi-aire site with trees dying back immediately after planting. There are general issues with plants and grass growing on the Sparks Croft area. The proposed Land and Marine site is adjacent to what was the Prices Candle works, now demolished, what toxins have been released during these demolition works and over the years to contaminate the ground beneath the concrete standing of this site. Both sites have old buildings and the potential for asbestos which will be disturbed during demolition; what steps will the council be taking to ensure the safety of residents in the area which demolition is taking place. There was no consideration for the safety of residents during the close down of Land and Marine with fires at night and explosives for demolition with no notice given. The same was exhibited with the demolition of Prices candle site and stacks. From both sites clouds of irritant dust and fumes have been commonplace. Prior to any developments being given approval in these two areas will the Council be conducting full and thorough duty of care assessments to ascertain what toxins and ground contaminants have been deposited over the years of industrial use on the land; in addition to giving consideration to the safety of existing residents for the removal of asbestos and airborne contaminants from the site?
DOR00235	<p>I cannot believe I am having to write this letter in response to the "proposal" to change the use of the Bromborough Civic Centre, Library and Rake Car Park, it is truly a bizarre proposal. This land and these facilities are huge assets to the village in their current form and should be left as is. I therefore ask that you consider this a formal statement of disapproval to the proposed "change of use" and I would urge you in the strongest terms to REJECT the proposal to change the use of the land to "Mixed Use".</p> <p>My objections are based on the following:</p> <ol style="list-style-type: none"> If it's not broke THEN DO NOT CHANGE IT I could understand the proposals if the car park was unused, being misused or an eyesore but this is simply not the case! I live on "The Rake" and can see the car park from both my living room and kitchen. I can therefore reliably inform you of how popular and busy the car park is. The Bromborough Car Park is a busy car park from around 8am to 7pm six days a week (Monday to Saturday). Between the hours of 11am and 2pm the: car park is usually at capacity but as people are continually coming and going, visitors can usually find a place. The car park is also used on Sundays by church goers for services, weddings, christenings and in the week for funerals. In the evening the car park can also be busy with people for functions at the Bromborough Social Club, and Civic Centre. The Car Park and Civic Centre are essential to the CURRENT life of the village As previously stated the Bromborough Car Park is extremely busy. The cars are continually coming and going. The visitors to the car park are making use of the shops and businesses in the village. It is these businesses and these people that are the lifeblood of the village and it is the Car Park, Civic Centre and Library that provide the essential conduit . Bromborough was granted a market in 1278 and has seen trading activity ever since. It is a fact of life now that people use vehicles to shop and go to the bank etc. If the village of Bromborough is to remain a village with any real form of commercial activity it needs to retain its Civic Centre and Car Park . - Fact - Nothing really to debate In the event of the car park land being used for anything other than a car park, I feel would spell the end of any real commercial activity in the village and the businesses it supports. People just will not come. Incidentally the Civic Centre and Library also heavily depend upon the Car Park for the participants and delegates of the various functions (including Charity Sales, Yoga, Community Meetings). It may be easy to see this land as an asset that does not generate income for the Council. This is very short sighted and simply not the case. This land secures the life of the village and the council tax paying businesses that provide facilities and employment opportunities to us all. The Council needs to see the bigger picture. The view should be to keep the use of the Car Park, Civic Centre and Library unchanged. The Car Park and Civic Centre are essential to the FUTURE life of the village I think we all understand that facilities must keep pace with a changing world, but that is precisely what these areas of land are already doing. Villages are failing due to a lack of parking. Customers are going to free car parks on bland, soul less trading estates visiting multi- national corporates. We in Bromborough have a chance to have the best of both worlds, we have the "soul less" Croft estate and the opportunity to maintain a true future proofed village experience that includes shopping, eating, banking, hair dressing, visiting a solicitor, estate agent. All these being a mix of big companies and independent traders (the back bone of Britain and its Entrepreneurial Spirit). On this basis alone the use of the above land should not be changing. The future of the Village and the businesses including future businesses is truly in the Councils hands. On a final note I understand that the land that the Civic Centre, Library, and Car Park occupy was bequeathed to the council for the "recreational use" of the residents of Bromborough. In its current form it is used by the residents and a change of use I feel would be not in-keeping with the spirit of that bequest. The Council should honour the spirit of bequests and not just use changing times as a justification for altering the wishes of our ancestors and kind benefactors. I re-iterate --- It really is madness. Please accept this letter as a formal objection to the proposed change of use of the Bromborough Civic Centre, Library and Car Park.

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DOR00236	<p>Firstly, referring to the declassification of some land from Green Belt, it is worth considering why our/your forebears gave certain land that classification. Presumably it was in part to protect the character of the land so designated but also, in part to protect the character of the whole of Wirral. Some of these characteristics (but not all) could be protected in part by strictly applied planning conditions. Many of the potentially declassified Green Belt areas are significantly distant from any services including lack of appropriate access roads. Please consider that development in some areas must reflect their isolation from essential services such as schools, shops and transport links. Not everyone wants to live in a sterile dormitory estate with no intrinsic life. This could, in part be ameliorated by the concept of a new Garden Suburb/Town if such a concept could be delivered. Secondly, I refer to the proposal for block declassification from Green Belt of the largest area to the east of the M53. Whilst this may satisfy the number crunchers, it fails to recognize that there is already a distinct east/west divide on the Wirral that will only be reinforced if housing development on this area is permitted. Despite that divide many people, us included, have chosen to live on the eastern side of Wirral and the draft Local Plan, if adopted as written, would, of itself, devalue the location in which we live. Thirdly, if the Local Plan is to provide housebuilding opportunities on former Green Belt land and non-Green Belt land this may give rise to an unfortunate bias. Building on 'virgin' land is intrinsically cheaper than on brown sites so there would be a bias towards building on the new sites. Building/selling property on new sites is also a new opportunity for the site owners. Many 'brown' sites already have a value "in the bank" (possible even accruing interest/rising in value). If a developer has a new site and a "brown" site there is little doubt that their accountant would advise developing the new site first. Fourthly, it is illogical to exclude the development in some "brown" sites, such as those owned by the Peel Group, from the Local Plan housing targets just because they have said that they are going to decelerate the delivery programme of the plans for their "banked" lands. Fifthly (and finally for this letter), if you are so confident that the Government's target figures for housing need on Wirral are overstated you must make every effort and be seen to make every effort to correct this before the Local Plan has to be submitted to them</p>
DOR00237	<p>in the light of the public consultation you are conducting on this matter, I would like to express, for the record, my complete opposition to the proposals in their current form. Rather than utilise essential green belt areas for the much needed housing requirements, I suggest you pursue Peel Group in order to secure a better housing yield and a quicker development of the brownfield sites they own.</p>
DOR00238	<p>I wish to lodge an objection to the proposed release of Green Belt Land for housing development. The Council have been promoting the necessity of releasing GB land, on the need to produce a housing plan based on targets set by the Government. Figures have been produced showing the housing requirements measured against the available land, including brownfield sites and plans by the developers Peel Holdings. It is my submission that the calculations are based on flawed figures and out of date information and even Peel Holdings have written to the Council Leader protesting that their proposals have been misrepresented. From the available information, it would appear that some GB land may be required but not the amount submitted for consultation. The Council have a set of Development Review Objectives and Criteria which I would say have not been met on several levels. In pursuing all these 'official' Wirral Council and National GB policy objectives we have shown that housing development on the site would be highly detrimental. In summary, on key issues of importance: 1. Overall nature of the site: it is classed as rural farmland' and 'high quality agricultural land' in recent council local area character studies; it is classed as 'not enclosed' and has a 'durable non-urban boundary' on the council's own definitions. 2. To reduce the impact of traffic intrusion in residential areas: the site is surrounded by traffic and accident 'hot spots' with poor access. 1500 to 3000 additional cars would be a disaster in terms of noise, pollution and danger. There is a high proportion of old people and a poor bus service already. 3. Services: primary schools are oversubscribed already. Surgeries and dentists are very busy. Some dentists have refused NHS patients. Spital station parking is already saturated by commuters. 4. To minimize the impact of flooding: site drains into Dibbinsdale 5551 to the south, an 'official' flood risk area. Site 1984 is very low lying and would require large volumes of surface, grey and sewage water to be pumped uphill -so ft. Pumping failure would flood Dibbinsdale 5551 with sewage. One assumes a 'sewage farm' draining into Dibbinsdale would not be permitted for the same reasons. 5. To maintain and improve biodiversity and natural habitat: site is adjacent to the Dibbinsdale 5551. It is bounded on all sides by 'official' core biodiversity zones. There are 4 large areas with tree conservation, preservation orders. It has 'important' hedgerows. It has several landscape types valuable to wild life and is classed as 'environmentally sensitive' by Natural England. 6. To maintain and promote a locally distinctive sense of place: site has a mix of landscape types with access paths, a mature fishing lake and protected woodland. Claremont Farm has a popular farm shop and cafe and runs well attended rural events. The Wirral Council Landscape Character Study for Clatterbrook & Dibbin Valley (including site 1984) conclusion is 'maintain & enhance'. The site is screened by woods and high ridges and only a few houses are currently visible. It is a dark sky site. 7. To conserve local heritage: the site is at the south end of the nationally important Brunanburh battle site. Pottery scatter, field marks, 19th century OS maps and modern lidar maps show large ground features which could be from several periods known to be present. There may be a Roman farm at Claremont. In day to day, practical terms affecting residents, the loading of car traffic from 1000 - 2000 new houses onto current local roads already congested and with several accident hotspots, is irrational. The location of the site provides no means of mitigating this. Public transport services are already poor in the area and non-drivers are not well served. Added pressure on busy local surgeries, dentists and full primary schools is also unwelcome. There are several other issues of broader concern. The site is classed as 'high quality agricultural land' which would be permanently lost under development. The site is classed as 'not enclosed' by urban development on the council's own definition. The durability of the site boundary is classed as 'strong'. Much of the site also has areas of high core biodiversity, tree preservation orders, mature woodland, ponds, lakes, ditches and hedgerows. The site is adjacent to the Dibbinsdale SSSI which would be put at risk. Water contamination is a risk but Wirral Wildlife point to the impact of disturbance from thousands of new houses and residents. The Wirral Landscape Character Assessment recommends maintenance and enhancement of this 'rural farmland' area. It is part of a wild life corridor from Raby Mere and Dibbinsdale SSSI to Storeton. Surely all this must not be lost forever? In practical human terms, site access via footpaths provides people from the local built up suburbs with a 'green lung', exercise, and leisure opportunities and an area of tranquillity which is much valued. *There is potential here for nature and history tourism. Of less immediate concern to some local residents perhaps, the area has a rich history stretching back to Pre-</p>

DOR REF	RESPONSE
	<p>Roman times with Neolithic artefacts found nearby. If the Council is serious, on behalf of the community, about 'preserving local heritage' it has to consider the growing direct and contextual archaeological evidence that site 1984 and its immediate surroundings may contain significant remains from several eras from Prehistoric, Romano– British, Saxon and medieval periods. For example the main Roman road from Chester to Meols passes just to the west of the site at Clatterbridge and soil marks in the north of the site hint at a large rectangular enclosure: perhaps a latifundium complex. The central locus of the great Battle of Brunanburh is immediately north of site 1984. Many historians say the uniting of Anglo Saxon Mercia and Wessex under Aethelstan to defeat Anlaf of Dublin at Brunanburh marked the true beginning of England (as Wirral Council Appraisals accept). If so the immediate area has national historical significance. Given the above I submit that release for housing development on Green Belt Parcel SP042/Site 1984 is harmful and totally at odds with the council's own development objectives and criteria. I ask the council what 'very special circumstances' outweigh the harm described above? If the answer is necessity forced on the council my second submission challenges that claim (2). The council has repeatedly argued in the media that they 'have no choice' but to build on Green Belt sites due to 'government imposed' housing targets and a lack of brown field sites for development. In fact the council has considerable room for manoeuvre consider the according to a statement from the DHCLG, to Parliament on 14.09.17:</p> <p>We're not dictating targets from on high ...these 3 [process] steps will provide a starting point, [for] an honest appraisal of how many homes an area needs. But it should not be mistaken for a hard and fast target...How to meet demand ...where to develop, where NOT to develop, what to develop...and so on, remains a decision for local authorities and local communities. 'Reference 2 addresses four issues:1. Are the current government and council housing need forecasts credible since they both rely on the same ' official' methodology and obsolete base data?2. Taking the most recent 'official' population data but keeping the 'official' methodology what are the future housing needs on Wirral?3. Taking a more transparent, trends based, method using the latest data what are the housing needs?4. Allowing for council identified housing places on brown field sites and the above forecasts how much Green Belt land actually needs to be released for development? The government 2017 target for Wirral is 800 houses per annum or 12,000 over fifteen years. The Council sponsored SHMA report of 2016 suggested 835 - 1235 houses per annum. Both are based on old data and old assumptions about population growth, household size, economic growth and migration and housing market conditions. The population data and many assumptions go back to the 2012 SNPP. If we use the Wirral population projections released in May 2018 by the ONS and scale the earlier forecasts appropriately we get a target of -1,000 houses not 12,000. Population growth rate has declined and will continue to decline post Brexit since most of the supposed growth is due to assumed and clearly optimistic economic migration into Wirral. Using an up to date trends based analysis suggests a needed build rate of 220 to 350 units per annum or -4,300 houses in total not 12,000. Taking into account the 91 brown field sites with spaces for 2,400 dwellings now identified by the council, which are supposedly to be developed first, the residual need would be for 1,900 to 4,600 houses from another source, depending on which of the above forecasts was taken .So, Peel Holdings have declared that they will build 2,900 dwellings at Wirral Waters, and over fifteen years up to 6,450 dwellings subject to agreement about support for infrastructure development from local and central government. Taking the post brown field residual need of 4,600 houses we are left at most with a need for 1,900 houses on the Green Belt. However the council proposed release plan covers - 7.6 square miles and -4,900 acres. At a typical NW region density of 14.6 dwellings per acre this land could support -11,000 houses. So in reality only 2.7% of the Green Belt land on the release plan would be needed even accepting the updated, overall 7,000 houses target. not factored in here is the 6,000 empty properties known to be on the Wirral. Overall the proposed release of 4,900 acres of Green Belt land is surely unnecessary. I submit that if a truly necessary few percent of Green Belt land needs to be selected for development it would be doubly perverse and irrational to develop land parcels adjacent to the Dibbinsdale 5551, namely SP042, SP043, SP044, SP045. Any such release would be challenged on these grounds. [additional information included as well as a letter by Peel Holdings in support of the argument]</p>
DOR00239	<p>We are writing to lodge our strong objections specifically to the Green belt parcel SP013 Land West of Column Road West Kirby• This is a parcel of high quality agricultural land, previously farmed to the highest standards as arable land, the majority of which is still being farmed annually. China Farm Lane Farm has only this year harvested a field of wheat in the large field behind the houses on Column Road and a broad leaved fodder crop is currently growing there. Hay and silage and other cereal crops are also annually grown in this field. Likewise the field next to that, towards Caldý Road is annually harvesting a maize crop. Such farming should be protected for its obvious food and fodder value but also as part of the area's long standing farming heritage. • Road access would be required for such a development along the very busy, winding Caldý Road and the accident alert area of Column Road on which cars currently frequently exceed the 40mph limit. The bend on Column Road in particular would present a difficult blind spot for motorists accessing and exiting from such a development. Similarly traffic coming down Caldý Road towards the roundabout would endanger traffic accessing the area, due to a lack of visibility. • Road congestion in this area is already very high, the addition of further housing would put even more strain on the routes to West Kirby and to Heswall. • Facilities in the area are also very limited - local buses only run hourly and there is no nearby rail access. • Services like medical, dental and schooling are also currently at relative over capacity and the addition of more housing would further stretch these services. • Ecology and wildlife - major damage would be done to the various bird, mammal and insect life which currently inhabit the fields and hedgerows concerned. Each year a large flock of curlews, a UK BAP priority and Amber listed species due to their international importance and declining numbers, return to rest and graze in these fields as well as a number of species of wildfowl and ground nesting birds. • As a general comment on the Government's targets for the Wirral, we understand that targets are already subject to review, due to over calculation by Central Government. With a relatively stable Wirral population at around 322,000 (despite dips 2006-10) but a strongly increasing trend amongst 50-85+ years and a strongly declining trend especially in the under 20s and under 50s groups, the assumption can only be that housing demand is likely to decrease in coming years. This especially in view of the precarious and declining position our local manufacturing industries have experienced. • The flooding and water table impact would also be a further concern. During heavy rains a torrent of water flows down Column Road, often resulting in flooding at the bottom of the hill. This has already been exacerbated by the filling in through recent developments of ancient linked ponds and ditches and consequent loss of natural "soak-away". With the added risk of climate change impact, we feel that to develop these fields could only further add to the flood risk.</p>

DOR REF	RESPONSE
DOR00240	<p>A plot of land at the bottom of my garden is outlined for future development. The land is referenced in the Options Review as SHLAA0708 Land at the Akbar [SHLAA0708 Map attached]</p> <p>I am writing to inform you the land held in trust by 6 properties that border the land in order to prevent it being developed. I wish to inform you that under no circumstances will I sell my 'stake' in the land to allow development, I would therefore wish this land to be disregarded as an area for future development.</p> <p>I would also add any development on this land would be severely detrimental to both the character of the area and wildlife that inhabits it, as the field has badger setts on it. There is also insufficient infrastructure to support any development as the current access roads are already nearly impassable by vehicles as they are not maintained by the Council.</p>
DOR00241	<p>I am seriously opposed to the Wirral Council's Local Plan and to the way the Council and particularly the leader of the Council is managing the process. Flawed consultation process. The Council has had many years to get this right and the residents have just 6 - 8 weeks to respond in this flawed consultation process. Why has Wirral Council been negligent in failing to prepare a local plan and update it every 5 years when it is a legal requirement? Had they done this, there wouldn't be such haste to bully one through without careful research and thought. For example there is evidence to suggest that our population projections are incorrect which will mean that we won't need nearly as many houses as the Council say we will. Andy Burnham the Mayor of Manchester has postponed their plan because he believes the population projections are too high, why can't Wirral see sense and do the same? There is evidence that the plan is based on inaccurate statistics. From the inaccurate projections of population growth to the analysis of figures which demonstrate the failure to take account of higher densities of modern development, which require smaller land take and can provide more homes. Why consult on inaccurate data, rubbish in, rubbish out!! New statistics show the nations Green Belt has shrunk by more than 10,000 hectares in a decade, does the council want to make an even bigger dent into our country's green belt. There is evidence that the leader is deliberately misleading the residents of Wirral and I have copies of two letters, which evidence this. The first one is a copy of the letter the Councillor Leader sent to the residents of Wirral and the second is a letter to him dated 10 September from Wirral Waters, in which they state that he is misleading residents and that the information provided was inaccurate. I believe that the politicians are not telling the truth and that they will disregard residents' comments in preference for their own political and financial gain. Increased council tax from more band G and H houses on green belt land and financial assistance from developers is I believe the heart of this plan. Additionally Developers and Consultants are making a large amount of money at the expense of Wirral residents, so why is that being allowed? I am aware that many people have been unable to attend meetings because they were not advised about the ticketing and when arriving they were turned away. Venues and times had to be changed because the Council had grossly underestimated the numbers who wished to attend and with changes of timings at short notice a number of people were subsequently unable to attend. I am also deeply concerned that the leader of the Council is the lead on Inclusive Growth, Economic Development, Digital and Innovation within the LCR Combined Authority. I would suggest that this is a serious conflict of interest. Local Plan - general comments I am deeply shocked and angered by the Local Authority local plans to decimate the green belt on the Wirral. The Liverpool City Region Combined Authority Metro Mayor Steve Rotherham (Labour) dedicated an entire chapter in his manifesto on his "green" ambitions and promised to use brown belt before any green belt for housing development. As a builder in his previous life I wondered at the time whether or not this statement was political rhetoric, and a potential conflict of interest, but now I can see that I was right. I understand that there are over 5000 empty properties on the Wirral so what is being done about that? Why isn't the Council negotiating with owners to refurbish these properties for affordable housing? One and two bedroomed affordable houses are needed for young family's not high-end luxury houses that will bring in more money to the Council.</p> <p>There are over 1500 planning approvals in place where no action is occurring, stopping the building of the houses we need. All that is happening is that Developers are getting richer and are waiting to develop on lucrative "shovel ready" Green Belt and the council are handing them the shovels. There are many brownfield sites and underutilized land that have not been considered for building homes by the Council and I want to know why. There is more than enough space for over 15000 houses so why use green belt? There is a CPRE Brownfield Register toolkit available and I believe the Local authority should be doing all it can to identify areas of brown belt, which can be used for affordable housing. What are they doing about identifying such sites? Why has the Council failed to keep this up to-date? I understand that there was inaccurate information contained in the register and significant omissions. Sites have been deleted with a promise to review them in 15 years!!! What on earth is the Council doing? Rubbish in, rubbish out! In my opinion The Wirral Waters Peel development plans, has seriously been mismanaged by the Council, both in contract terms and in planning terms. Why did they give Peel Holdings 23 years to build 13,000 houses when they are not going to build that number? The information now provided by Wirral Waters has confirmed that the Council is using underestimates of the numbers of houses to be built. There have been two planning applications (although for significantly less houses than were promised) by Peel Holdings this year, which have not been progressed by the Council, why not? I am advised that all the necessary remedial work needed to the Wirral Water site has been completed so what is the delay in granting planning permission? The Wirral waterfront is the last dockland to be developed in the country and look what success others have achieved, why is the Council causing delays and refusing to allow further development in these brownfield sites. Central Government Directive Section 44 clearly states that Councils have to build the right houses in the right place. You have a legal obligation to follow these Directives. Are you going to ignore your legal obligations again? The right places are obviously Birkenhead, Wallasey, Rock Ferry, New Ferry and not on green belt land. Why isn't the New Ferry area, which is crying out for redevelopment being developed by the Council? The Government has recently announced extra money for regeneration of affordable houses, has the Council made any decisions to apply for this funding? The New Ferry area is so near to the beautiful area of Port Sunlight, which is in high demand, so I would have thought that extending these nationally recognized development plans into the New Ferry area would be very welcome by young couples and families who need affordable one and two bedroomed housing. The right homes in the right place.</p> <p>The Council appear to have ignored the planning rules for exclusion, for example, flood risk, risk to migrating birds and high quality farm land. The latter is going to be very important if the Labour</p>

DOR REF	RESPONSE
	<p>party is successful in bringing down the Governments Brexit plans. With these local plans, prime agricultural land will be lost forever and we will need all the farmland we can get to grow our future food supply.</p> <p>I am concerned about any misuse of greenbelt in South Wirral by the Council, but I am particularly concerned about the misuse in the Higher Bebington and Storeton Village area, which seems to take the most impact in the local plan.</p> <p>My Objections for building in the Higher Bebington and Storeton Village area.</p> <p>The Eradication of village life is to be preserved in planning policy and Storeton Village and the Lever Causeway has particular historical significance. It is mentioned in the Doomsday Book of 1085 as part of the estate of Nigel de Bureau, and it is thought that the poem Sir Gawain and the Green Knight from the 14th Century refers to Storeton Hall. Storeton Hall was built in 1360 by William Stanley and has been a prominent historical feature since the medieval period.</p> <p>Urban sprawl will destroy this Storeton village, it will become merged into Higher Bebington, and we need to preserve this historic village and preserve its character by preventing urban sprawl down the Lever Causeway. The Lever Causeway is one of the planned avenues designed in 1912-1914 by the Viscount Leverhulme and links Storeton and Higher Bebington and many people enjoy its picturesque scenery.</p> <p>The Lever Causeway is probably the most beautiful avenue on the Wirral and is used daily by walker's cyclist's runners and riders. It's not just local residents that use it, people travel for miles to use it. How will planners ever be able to look their children and grandchildren in the eye if they destroy this beautiful Avenue? The Local authority spent considerable amount of money creating a walking and cycle pathway down the Lever Causeway. What a waste of residents' hard earned money provided to the Council through Council tax to ruin this amenity by building houses that are not needed there. The increase in traffic will have a significant impact on the recreational use by walkers, cyclist's runners and riders in this area not least by the people who live in the surrounding areas.</p> <p>Japanese knotweed has been found down the Lever Causeway in the last few years, will houses be safe?</p> <p>There is evidence of the significance of parks and green space on good health and wellbeing and the use of the Lever Causeway in this respect is very important.</p> <p>Previous applications on Marsh Lane and Storeton Village were refused on Green Belt grounds</p> <p>The Destruction of valuable ancient woodland and flora and fauna in the Higher Bebington area, once gone will never be recovered. We have to safeguard this area from encroachment.</p> <p>The unrivalled views from Lever Causeway and Mount Road's elevated position will be destroyed by new housing and will cause irreparable damage to its setting and cause substantial visual impact on the remaining green belt. Building in this area will change the character of this area for ever. The infrastructure of roads, schools, public transport and health care is not adequate to sustain an increase in the population in this area. Classroom sizes are getting larger, queues in health centres for GP appointments are getting worse. It can hardly cope now, so any further traffic and people into these areas will cause chaos. Public transport has been drastically cut in this area and Mount Road is a particular case in point with no buses now and with increased traffic flow. The local council has reintroduced a traffic camera on Mount Road, because of the speed the cars travelling on the main road travelling to and from the motorway. More houses on these green fields will make it untenable for those that already live in the area.</p>
DOR00242	<p>We understand that Wirral Council now has a plan for building on green belt land - a considerable number of sites When land was designated as green belt, presumably there were valid reasons for doing so I would anticipate that these reasons are still relevant, so why should Green Belt land now be built upon? We believe that any use of Green Belt land for building would lessen the character of our area and be environmentally detrimental.</p>
DOR00243	<p>Franky Conservation Area: Potential Infill Village ·</p> <ul style="list-style-type: none"> • We do not accept that proper steps have been taken to avoid relaxing development restrictions as there is: <ol style="list-style-type: none"> a. an overestimation of need for housing within the borough; b. an inadequate analysis of brownfield sites (WBC data is incorrect and incomplete), refurbishment/conversion opportunities, unfulfilled planning consents and empty properties within the borough; c. a failure to consider housing need within the context of Wirral being part of the Liverpool City Region, namely by taking account of housing capacity within Liverpool. • There is a repetition of the generic statement that 'limited Infill development could also be allowed within defined areas of the village' despite there not actually being any site that could be developed without impact upon the character and appearance of the Conservation Area. • Buildings within the Franky Conservation Area have and continue to be developed and changed in use over time while being subject to appropriate planning restrictions that apply to a Conservation Area within the Green Belt. That Infill development within the Conservation Area would relate to new build housing runs entirely contrary to conservation principles and amounts to incorrect process. <p>[A council representative at the WBC meeting at West Kirby Concourse on 13th September was clear that infill relates to 'new build' housing only and was adamant that WBC was not interested in and would not be prepared to include in housing figures the conversion or development of any pre-existing buildings].</p>

DOR REF	RESPONSE
	<ul style="list-style-type: none"> • There is no housing need within Frankby. There are and have historically always been properties that take a number of years to sell in the Conservation Area and the wider village; and all business owners within Frankby reside at their business premises already or have employees that do. • There are no local shops or amenities other than community halls within Frankby Conservation Area and it is not 'a larger village' as those identified previously for Infill Village status. • There is a legal duty upon WBC to pay special attention to preserving or enhancing designated Conservation Areas with heritage assets having been identified for specific protection in national policy (NPPF, para 184) • Wirral Landscape and Character Assessment places the area in which Frankby sits in the highest category of 'good' with an overall landscape category of 'conserve', with an emphasis on managing its key features. The importance of trees and hedgerows within the village are noted to soften and integrate properties within the surrounding landscape. <p>GENERAL</p> <p>• The borough has been noted as having the highest supply of housing in the UK. • There area has been described as having low demand for housing by central government. • The ONS housing projections have been amended suggesting a Revised Standard Method Calculation of less than 7,000 or less than 450 per annum over the plan period. WBC can challenge this lower figure in any event on the basis of 'compelling circumstances' on the basis of actual local population needs. • Using figures from 'Wirral Compendium of Statistics 2017' a WBC document, it is anticipated that the population of Wirral will continue to fall by 6544 by 2030. • WBC's assessed housing need is based upon unrealistic assessment of future growth. In addition, Brexit looms. The ONS highlights lower projections of births, life expectancy and migration. • WBC should be investigating available housing in the Liverpool City Region Combined Authority as a whole and taking into account where Wirral residents work - it is believed that 40% of Wirral residents commute into Liverpool indicating that housing need is in Liverpool as opposed to Wirral. • The borough is noted for its dilapidated housing stock - the need is to refurbish existing housing. • There are estimated to be up to 6000 empty dwellings in the borough, although WBC believe this to be 4000. A programme of putting them back into use needs to be accelerated above a rate of 260-280 a year. • The updated NPPF, July 2018, states that all brownfield sites must be used before there is encroachment into the Green Belt. • Brownfield site regeneration will assist in supporting the proposed redevelopment of the borough's urban areas by placing housing and thereby demand for facilities alongside where they have been located. • There is believed to be capacity for 18000 homes within Wirral brownfield sites. • WBC needs to be prepared to use Compulsory Purchase Orders to ensure that brownfield sites are put to good use and regenerated. • Phase I of Wirral Waters is believed to be completely viable - it is for WBC to prioritise and progress the planning applications and to meet infrastructure needs. • Peel Holdings have indicated that they will provide between 2700- 6450 houses over the plan period, not the 2400 that WBC alleges - and they already have permissions for 13,500 over 22 years. These and the 350 Urban Splash houses should be taken into account as it is up WBC to ensure viability issues are overcome. These projects are more reliable than hypothetical development figures and central government grants can be obtained in 'housing zone status' areas • Case law confirms that housing projections to be taken account only need to be possible. There is no reason for them to be definitely deliverable making the WBC's approach fundamentally flawed • Questions have been raised about the proposed building densities indicating that higher density housing of 30 dwellings per hectare would be appropriate in areas of greatest need for regeneration and in areas in easy walking distance of an existing district centre. • Green Belt land that is being considered for release could support 70000 homes -vastly excessive. • The Green belt of Wirral classified as good farming land according to the Agricultural Land Classification of Natural England. As a nation the importance of an ability to meet our own food needs at home is being increasingly recognised, including for environmental reasons. • There seems to be limited expectations that any housing provided would meet the needs of those wanting to down size from large properties or those wishing to get on the housing ladder. • There is no link between releasing Green Belt land and achieving the recognised need for affordable housing. There are greater rewards for both building developers and WBC if large houses are built and it is well known how easy it is to circumvent the requirement to build at proportion of affordable houses on the basis of poor 'viability' assessments. • There is no indication of what appropriate infrastructural support would be put in place in areas where increased demand for services and traffic would be brought about. • Although there have been meetings and maps available to inform local people about the plans, it was obvious at the meetings that people find it difficult to navigate all the very lengthy documents online - indeed a link in letter to our Conservation Area does not even work - and in many cases, people were unable to make sense of the map. • WBC should be prepared to erect site notices at the sites where the Green Belt is threatened with release. Such notices should explain what had been proposed by developers so that local people can consider the same information that is before the council. • There is no brownfield land that cannot be put into use for housing - it is simply a question of costings and political will. WBC priorities do not meet the priorities of those that they represent who believe that all the Green Belt needs to remain. • WBC has not fully examined all other reasonable options for meeting the need for development and therefore cannot satisfy the test that exceptional circumstances exist such as to justify changes to the Green belt boundaries required by paragraph 137 NPPF • We urge WBC to pay heed to all the concerns raised and analysis done by the Wirral Society; Wirral Wildlife Society, Irby Thurstaston and Pensby Amenity Society and Wirral Green Spaces Alliance.</p>

DOR REF	RESPONSE
DOR00244	<p>I wish to register my objections to the Green Belt Land reference SP071, Land at Chester Road being used for house building:</p> <ol style="list-style-type: none"> 1. The land in question forms a part of a very productive and well run farm. Surely farming is to be encouraged in view of this Country, looking forwards to self-sufficiency in food production. 2. The A540 is the main route into and from the area for both commercial and private vehicles. As it is we already suffer inconvenience, noise and pollution from the current volume of traffic. In peak times delays occur in Heswall and Barnston Villages. 3. Residents from the proposed development will have to commute as there is little employment available locally, thus adding to the traffic problem. The Wirral Metropolitan Borough Council have a poor record for housing building. Therefore, it would appear that the easy option for the Council is to provide a large Green Belt Site for a private Developer.
DOR00245	<p>These sites border the Grange Road, the A540, the main thoroughfare into West Kirby from the South. This is very busy at all times, particularly early morning and later afternoon when school buses use the road. It also carries articulated vehicles supplying the Morrison's and Asda stores. As residents of a side road leading on to the Grange Road, we can testify as to the long-time one can wait to find a space to enter the road by car and indeed to cross it on foot. The volume of extra traffic produced by this proposal would severely and, in our opinion, dangerously increase this problem. The plots in question represent the last remnants of the agricultural history of West Kirby, a largely farming area until the advent of the railway. They provide green lung alongside the main entrance to the centre of the town with a hint of its earlier use with the presence of grazing sheep. We have witnessed badgers, foxes, bird of many varieties including both type of woodpecker. It seems to us the wrong policy to destroy an area of beauty which gives great pleasure to both residents and visitors and which contributes so much to the character of the town. Much better to concentrate on improving areas which have deteriorated or which can be redeveloped into residential areas especially on the north side of the area bordering the Mersey which could benefit greatly from investment. One only has to visit Bristol, Leeds, Salford, Lancaster and Liverpool to see what can be done. Continuing to encroach on green areas and discarding areas that have deteriorated is a wasteful policy when resources should be concentrated on improving what needs to be improved. We should be protecting what we have that is good and improving what we have that is falling into decline or is redundant. We also question the need in this area for the number of new houses which the government seems to be imposing.</p>
DOR00246	<p>Although I am in absolute agreement that more affordable housing is urgently needed and should be built, I am amazed at the fact that much of our beautiful Green Belt (in particular SP060) is being earmarked when there are so many brownfield sites available. I have lived at this address since 1999 and during that time there have been various attempts to build a dwelling at the south of my property adjoining Wych Elm Woodland and Arrowe Brook. These requests were not only rejected on a couple of occasions by the Planning Office but subsequently after appeal by the Builder went to The Planning Inspectorate and overseen by an Inspector appointed by the First Secretary of State. He came up from Bristol and visited the site before coming to his decision. The Planning Inspectorate's decision given on 18 June 2003, was a resounding 'No' and he arranged for the Green Belt to be amended in the UPD to follow the western edge of Elm Road. The site is now a very small part of the statutory Green Belt which is up for approval. The decision also stated in accordance with PPG2 "The fundamental aim of Green Belt policy is to keep land permanently open and the important attribute of Green Belts is their openness." You can imagine my alarm and distress to hear that now the whole Green Belt area between Pensby, Thingwall and Irby at the end of the road could now be considered for building. This is just not acceptable for the following reasons: 1. Having previous planning permission rejected and even on appeal the land was brought in to the Green Belt to protect it, surely this carries credence. 2. Menlo Avenue and Elm Road already have traffic problems due to the fact that cars cannot park on the road in Menlo Avenue as it is too narrow and therefore use Elm Road which causes problems for other residents plus various utility and delivery vehicles. 3. Harrock Wood (belonging to the National Trust) together with adjoining Wych Elm are a haven for a variety of our important wild life, including bats, ducks, owls, greater-spotted woodpeckers, nuthatches, and newts. I love access to our open spaces and walking in our woods. There is also a large natural pond in the field frequented with ducks and geese and no doubt with frogs and newts. Please protect them! 4. I purchased my home for its situation and to be part of a village community, which I am enjoying. If the plans go ahead Pensby, Thingwall and Irby will be one concrete block with no individual identity Please take the above points into consideration.</p>
DOR00247	<p>Subject SHIAA2024 - SH LAA2025 - SHLAA 3036 Further to the recent publication concerning the above site references chosen by the Forward Planning Section, for a mixed use development in Bromborough, we would like to object to the proposal. We find it hard to believe that the Planning Section have come up with this idea. We would dearly like to know the criteria that was given to them, the agenda, and by whom!</p> <p>The current main carpark is continually full 6days a week, between myself and my wife we probably go into The Village 12 times a week. We do a lot of shopping there using a variety of businesses and our bank, HSBC. Without the carpark where would we be expected to park our cars? The immediate alternative would be to use the side streets dotted around The Village, however this brings its own problems with congestion and relevant aggravation to the local residents outside their homes. This in turn I can see the borough traffic management team, creating either no parking zones, resident parking only zones, double yellow lines etc. which would be counter-productive to the problem. You have to remember when the majority homes in the area were built it was never contemplated that today's traffic would be envisaged. We'd be interested to know whether any traffic management surveys were carried out prior to this proposal</p> <p>Likewise removing both the Civic Hall and Library which are both part of the hub of the area, we cannot fathom any practical reasoning for these proposals. These buildings are used by local and surrounding area residents. The council have already cut the library hours, this limits the use of a cherished and well used facility. likewise the Hall is used by a number of organisations and also for private functions. Because we are an aging population cuts like this by the council are attacking what is becoming the more vulnerable members of society both immediately and for the future like it or not we believe you have an obligation to keep these and other similar facilities across The Wirral going, which if we are right are part paid for by residents through their housing and business rates and from Central Government. It's too easy to go for the quick fix, just close and demolish. Once gone they will never be replaced.</p>

DOR REF	RESPONSE
	<p>Again what is meant by "Mixed use development"? Is this both business and residential, this again brings up the issue of parking. Already with the present carpark, it services The Village very well. Any expected new businesses would also have issues as to where their customers would park, new builds would certainly exacerbate the problem.</p> <p>At this time we are led to believe that there could be over 4000 empty properties across The Wirral, as a start would it not be sensible to bring these back into use? It would be interesting to know if the council have used their powers by using:-</p> <ol style="list-style-type: none"> 1) Compulsory Purchase Orders(sec17 of the Housing Act 1985) 2) Enforced Sales Procedures (sec17 of The Housing Act 1925) 3) Empty Dwelling Management Orders (EMDOs) 4) Section 215 Town & Country Planning Act 1990 <p>Subject SHIAA2024 - SH LAA2025 - SHLAA 3036 Further to the recent publication concerning the above site references chosen by the Forward Planning Section, for a mixed use development in Bromborough, we would like to object to the proposal. We find it hard to believe that the Planning Section have come up with this idea. We would dearly like to know the criteria that was given to them, the agenda, and by whom!</p> <p>The current main carpark is continually full 6days a week, between myself and my wife we probably go into The Village 12 times a week. We do a lot of shopping there using a variety of businesses and our bank, HSBC. 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The only possible reason that we can see that they are not included in "The Plan" is that to potential developers, they could be more costly to develop, hence their profitability is reduced on the sales-is this correct or not? Going back to the car park issue, the only other possible locations for shoppers and businesses to park cars would either be the CO-OP, Matalan, Royal Oak and The Bromborough Pubs, and I am sure like " On street parking" in the various roads around the Village, the owners and businesses would be concerned that non customers would be using their facilities, and bona fide customers would have limited access to their premises. It could get messy!!!Without parking facilities both present and new businesses would /could find it impossible to continue trading, the knock on effect would be the loss of jobs', you would lose the revenue from business rates, which could not be easily replaced. I know that people already visit The Village to do their banking, due to other branches in the area having to close down. This also creates a lot of casual footfall for the local shops to increase their returns. If no parking it could push the banks to further cuts, and there are a lot of people who don't do or like internet banking, and local businesses would have to go further afield to bank their daily takings, provided there are any businesses still going!!!! This would surely be counterproductive to the councils efforts to encourage business to the Wirral So to summarise, we believe that the proposal, is short sighted , ill-judged and both short and long term consequences have not been thought through properly, so we are saying a resounding NO to these possible changes to Bromborough Village. Which if carried out would see the end of the Village as we know it.</p>

DOR REF	RESPONSE
DOR00248	<p>I am writing to register my objections to the prospect of selling off Green Belt land in various areas of Wirral for building. Many others have written and spoken eloquently on this subject. Below are some comments I would like to make: Principles: This Labour-controlled Council seems to be flying in the face of the basic Labour principle, so trumpeted during the last election campaign –‘for the many, not the few’. It seems to be prepared to sell the Green Belt land – a finite resource – to the highest bidder, despite previous ‘brownfield first’ promises, in order to build expensive houses (paying higher Council Tax) for people already on their way up the property ladder. Previous Land: Green Belt land helps to make Wirral a desirable place to be, both for residents, visitors (who boost the local economy) and wildlife. Much of it is rich and productive farmland, which cannot be replaced and which in future we may need even more than we do now. Pricing: Pricing out the locals is no way to win friends – or votes. It is not possible to market Wirral on its heritage, countryside, views and leisure activities whilst building on chunks of said countryside and taking steps to put living here beyond the reach of many young/low income Wirralians. Property Types: Wirral’s most urgent need is for affordable housing and single person housing, not luxury homes. This may be less attractive to developers wanting to make a big profit, but it is what Wirral needs. Surely the Council is supposed to serve the needs of its voters first and foremost? Why is this not happening? Why is the Council letting its people down so badly? Planning: all these highly publicised threats to Green Belt are based on unrealistically high targets set for house-building. These figures need to be challenged immediately. Selling the family silver’ is not the answer; once it’s gone, its gone. Plans by Peel Holdings to build on Wirral Waters need to be expedited without any further delay. Other developers with plans for house-building approved, but who have not yet started work, likewise any ‘land bankers’ need to have pressure put on them to get to help the Council show the Government it is making an effort to meet its targets. Promises, promises...finally, if the Council would put as much money and effort into planning for affordable housing on brownfield sites as it has into the ‘Golf Resort’ vanity project, which would destroy Green Belt land and is by no means guaranteed to be a success. Wirral would also be a better place for those who live there – and for those who at present cannot afford to do.</p>
DOR00249	<p>I am one amongst thousands of Wirral residents who is very concerned with the plans that the Council have to allow buildings on green belt land. There are several points I wish to make:</p> <ol style="list-style-type: none"> 1. You have had a couple of years to make a decision on this point and get the information to Government, but you have done nothing. 2. Peel Holdings submitted plans in April, I understand, to develop Wirral Waters which, with officers and other businesses, will provide hundreds of housing units, but they still await to hear from the planning department. 3. There is space of 18,000 houses on brownfield sites on the Wirral, which is more than is required to meet the target, but obviously the developers don’t want these areas as their profit margins would reduce. The Council needs to tell developers that if they want to build houses on the Wirral, then there will be restrictions – take it or leave it. 4. The areas you have suggested would only provide housing for the people who can afford these houses (i.e. already in work, well paid-middle-income or higher). Developers won’t want to build cheap houses on this land as it wouldn’t be to their advantage. 5. We need housing to be provided in areas of deprivation, in an attempt to bring these areas to a higher standard of living. If people have decent housing they are more likely to look for suitable work and improved standards of living. 6. Are Wirral Council challenging the Government targets? Does central government actually know the amount of housing required in our particular area? 7. It is a known fact that the population of the Wirral is decreasing. An estate agent recently commented that most of the houses sold and purchased on the Wirral are by people already living here, either buying bigger houses to meet their family needs, or down-sizing as their families leave home. You will end up with more housing stock than is required 8. The Council should not allow the influence of large housing companies to put pressure on them; they are in it for profit; The Council is elected body elected by the people, so should make decisions which are best for the area and the people of the area. 9. Further development of green belt land will add to congestion on already congested side roads, more children requiring schools which are over-subscribed already, and you can’t get an GP appointment when you want it already without adding to the population even further, and the effect on A&E doesn’t bear thinking about. 10. Further traffic will add to pollution and increase in accidents. 11. If you get rid of green belt land, and not only will these areas be lost forever, but animals and insects, etc. will lose their habitat. Having these species on green belt land helps with the natural processes and green land assists with the chlorophyll process which in turn helps eliminate some of the pollution. Many children in built-up cities already suffer with chest complaints purely due to pollution. <p>Do we want this for our children, grandchildren and further children down line? Flooding is a large issue in this country because of general over-development. More concreted areas will only serve to increase flooding. Is the Council prepared to cope with this? Is the council going to take measures to prevent flooding in the future? You only have to go to the Environment Agency’s website to see how many areas on the Wirral are already a flood risk</p>
DOR00250	<p>(SHELMA) - Local Plan 2018 A public inquiry held from September to November 1982 (Inspector C Danby ARICS MRTPI) titled Merseyside Green Belt Local Plan dealt with "the relationship with Structure Plan Policies, the permanence or otherwise of boundaries, the degree of tightness at the urban fringe, and so forth". Of the inspector 's conclusions, one stated "a principal aim of the green belt is to contain the urban areas and prevent them from encroaching further into the countryside and it (the green belt) should not stifle legitimate improvements or changes in the economy of the rural areas. I consider these policies (green belt plan) essential to prevent unnecessary development." To my knowledge this plan has never been withdrawn or amended. Today the green belt occupies approx 45% of the borough's land area and the local plan intends to reduce this by a possible 14% (figures from WBC). WBC are the public body whose duty is to protect the green belt, a</p>

DOR REF	RESPONSE
	<p>duty they have now failed by their stated intent to designate green belt areas for development. WBC have not commented on the status of green belt land designated for development but not developed. This will give developers further opportunities in future years to apply for planning as green belt designation has been lifted, if rejected, an appeal to the Planning Inspectorate would surely follow. Liverpool City Region (LCR) and the Metropolitan Mayor. The LCR is now the top tier administrative body taking over certain duties from the regional authorities. In 2017 an LCR SHELMA was prepared in consultation form with input from WBC. As far as I am aware this was not in the form of a public consultation. In its introduction it states that "it will (the report) also provide an evidence base supporting the preparation of local plans by individual authorities within the City region." I interpret evidence as being factual. This report together with that of the Wirral report have not provided any factual evidence as it/they are based upon forecasts derived from imprecise and flawed calculations. The LCR plan envisages that Wirral requires 875 to 1235 dwellings, per annum, will be required to be built every year for the next fifteen years. Wirral Borough Council have recently attended a WBC public consultation meeting in respect of the Local Plan 2018. How disappointing! No Councillors were present, the meeting being conducted by a deputy planning officer. The consultation centred on a perceived shortage of housing over fifteen years and the designated green belt land required enabling the "necessary" dwellings to be built. The consultation was restricted by the Council to informing the public of what it (the Council) intended to do. The response to 95% of the many questions asked was that of 'problems aired would be dealt with, in due course, by developers, through normal planning procedures'. Fait accompli! Normally, when one applies to change the status quo, myriad impact statements are required to show the effects that such large undertakings will or will not have on existing conditions. This plan will affect local infrastructure, wildlife (of economic importance to the area), greenhouse gases, carbon emissions, waste storage and disposal (of which Wirral is severely restricted), healthcare institutions (already under pressure), other medical services, public services, schooling, pre-schooling etc. The announcement of future developments, without a start date, will also affect existing property valuations without any form of compensation for existing residents. None of these points could be consulted upon.</p> <p>Q: Why was there no impacts of the plan considered as part of the plan? WBC appears to be holding two contradictory beliefs, one of green belt land protection and another of development on green belt land. Having already earmarked green belt land to build a fire station and a golf holiday resort + 160 luxury houses with bypass is evidence enough of which belief is stronger. WBC have been informed by neighbouring boroughs that they would be unable to provide for any of Wirral's identified housing needs. As WBC housing need appears to be grossly overestimated and the public consultation is silent on the matter, are we to assume that Wirral have accepted other boroughs unsatisfied identified needs?</p> <p>Looking at all the reports and plans produced by WBC since 2006, most produced by outside consultants, the Council seem to spend most of the time in a fantasy world. No wonder they have no time or money to fix potholes and street lighting. Poverty and extravagance are not so strange bed fellows. WBC Local Plan 2018 (to cover 15 years) To quote from Oddball (Kelly's Heroes) - "I love it when a plan comes together!" I wonder how many Wirral residents will share his sentiments when this plan comes together. The calculation of the local housing needs assessment for dwellings requires the use of a projected guess by the Office for National Statistics (ONS) of the Wirral population based upon untested assumptions and an algebraic formula derived by mathematicians. The merest fault of .01% in any of the guesses will destroy green belt land forever! The answer could have been verified by the use of the probability theory, this, at least would treat the concept in a rigorous mathematical manner by expressing it through a set of axioms. Just as ridiculous as the original concept! The calculation does not recognise a small peninsula with a restricted land area. It does not recognise a diversity of landscape or population. It does not recognise special needs or topography. It simply calculates a figure, which is a guess! A wrong guess and green belt land has gone for good because someone in London got the enforced calculations wrong! In 1996 the ONS estimated population of Wirral was 322,700, in 2017 it was 322,800, in 2023 to be 325,200, 2028 to be 326,900, 2033 to be 327,800 and 2038 to be 328,300. An estimated increase of population of 5,600 over 42 years! (Source - Wirral Intelligence Service Report 2018 aka Wirral Borough Council). This is an average increase of just 133.33, per annum, over the forty-two years. Five year population trend increases are 2018 to 2023 - 0.6 per annum, 2014 to 2028 - 340 per annum, 2029 to 2033 - 180 per annum. You will note that there is no discernible long-term consistent upward trend. An adjustment to reflect market signals can be made. Adjustment factor = (Local affordability ratio - 4) divided by 4 multiplied by 0.25. The local housing need is therefore (1 + the adjustment factor) multiplied by the projected household growth. C) There are further calculations that can be used to cap the level of any increase in need to "ensure that the method is deliverable". The calculation of dwellings required by the Council has not been explained to the public, furthermore it is based upon speculation not fact. Based upon the Council's figures provided by Wirral Intelligence Service the recommended 800 dwellings required per annum cannot be substantiated. The local affordability ratio is too varied depending upon which area of Wirral is looked at and there is no explanation of why the adjustment factor uses 4 and 0.25. In the Wirral Intelligence Service compendium of statistics the population of ages 0 to 19 and 75 to 90+ are included. The Local Plan does not state whether the additional dwellings required includes or excludes these age groups in its calculation. I for one am not prepared to sacrifice our green belt areas for good, based on speculative forecasts and algebraic equations, and have no confidence in the result provided. I do not believe that Wirral requires 800 new dwellings per annum and a total of 12,000 over fifteen years. As George Orwell said, "Sanity is not statistical" (Courtesy of 1984) and "If you want a picture of the future, imagine a boot stamping on a human face - for ever".</p> <p>Brown Field Land- Brown field sites were mentioned during the public consultation meeting. The Council's conclusion being that there is insufficient brown field sites to satisfy the Local Plan needs. Wirral Waters (derelict dock land), owned by Peel Holdings, has outline mixed-use planning permission over 22 years for 13,500 residential units and a further 620,757 sqm of office, retail, hotel and conference, cultural, educational, community and amenity floor space. (Source WBC). The council plan currently provides for 1,100 units during the plan period. Subsequently amended by a letter to residents (August 2018) to 2,400 dwellings in the next 15 years. In a letter, dated 18/09/18, Peel deny this claim stating that "the minimum figure we provided was 2,900. With the support and co-operation of the Council this could be 6,450 in the next 15 years to reach the ultimate goal of 13,000 homes." Proper negotiations with Peel have obviously not been undertaken. This is not</p>

DOR REF	RESPONSE
	<p>acceptable. The public consultation document merely emphasis that brown field land is insufficient to meet the demands of the Local Plan. Brown field sites were not mapped in the consultation document in any clarity compared to the designated green belt sites leaving the public none the wiser over the Council' s conclusion. Green Belt Land Wirral green belt land represents 45% of its land area and the Local Plan aims to reduce this by possibly 14%. No impact assessments have been undertaken as the Council intend to leave this to future developers through planning requirements . I note that the Council has taken green belt land at Saughall Massie and Hoylake to build a fire station and an anticipated golf course + 40 bed hotel complex + 160 luxury houses + a bypass to service the hotel and houses. There are no exceptional circumstances required to allow a golf complex, hotel or luxury houses to be built. Two golf courses are already adjacent to the designated new development, one being The Royal Liverpool Golf Club host to the R & A Open Golf Championship. The Council have already spent £1,000,000 on this development with no sign of physical development. (Source WBC). The Council also intends to spend a further £17 million, apparently, on roadworks required by the development. I note that a report produced for WBC in November 2006 (Source Capita Symonds) stated that "the major obstacle to the proposed development of the golf resort and the very special circumstances required to overcome a green belt objection would be difficult to demonstrate." The Council, the protectors of green belt land, obviously found special circumstances that are not obvious to anyone else! I assume that as the golf course is not needed then the special circumstance would be the hotel or the houses but without a golf course there is no need for houses or a hotel. Should this development not have been externally investigated? Not a good track record for protecting our green belt. I reflect that shortly after the golf complex development was announced, Gilroy Scrape, adjacent to the complex, and a supporting habitat to the Dee Special Protection Area was drained. The scrape was the winter home to 2,000 to 3,000 Black Tailed Godwits. The scrape was eventually refilled but the Godwits have not returned. According to the Wirral Society a statement made by WBC says "a submission was received from an agent on behalf of a strategic land investment company. The company are seeking the removal of the field that contains the scrape (plus other adjoining land) from green belt protection with a view to develop it for housing." The Godwits have not returned and nobody was prosecuted. May I suggest that developers, who by their nature are not in business to protect the green belt will take financial advantage of the WBC Local Plan 2018, especially if allowed to develop on designated green belt areas. We know from the consultation meetings that landowners and developers have already contacted the Council to express consent to sell green belt land for development. Can one assume therefore that the WBC public consultation is a name only exercise and only a public show. Property Values. An unforeseen consequence of the publication of the WBC Local Plan is that although full details of designated green belt land for development is identified, no development action is expected in the near future. New developments by large building companies would be upward of fifty dwellings. (Source WBC consultation) Present dwellings overlooking or in the vicinity of these designated can expect a loss in value as the original purchase valuation would have included a green belt premium. No mention of this is mentioned in the Local Plan, therefore present owners can be expected to take the hit with no recompense Infrastructure and Impact Assessments The Local Plan is a statutory land use planning document and as such does not take account problems of infrastructure strains. The Council have stated that all or any such effect will be dealt with by planning consents. It is common knowledge that with the introduction of a Planning Inspectorate regime, local authorities do not have ultimate control over planning matters. If Councils lose an appeal it will be the council taxpayer that pays the bill. One can imagine that future green belt developments will ultimately have to be dealt with on a case by case basis with a distant Planning Inspector as the final arbiter. There is ample evidence around Wirral of improper developments where inadequate infrastructure has not been a bar to development. Take Milner Road, Heswall for example - two blocks of apartments containing twenty nine 2/3 bed dwellings with one car space each. Built four feet from two up/two down cottages with no car parking built in the 1860 's. The two lane road outside is now so blocked by parked vehicles that through traffic, especially service vehicles, struggle to use the road. With other apartment developments Heswall has become traffic and pedestrian nightmare, main routes jammed, pavements used as car parks, side roads now become rat runs and emergency vehicles are snarled up in it all. Heswall is not unique as other Wirral towns and villages suffer under the same fate. Urban planning has not been a success on the Wirral, I find it impossible to believe that development planning will be any better in the future, particularly on green belt land. The last Council Local Plan was submitted in 2000, had the Council submitted Local Plans in due fashion then the present problems may not have arisen. Will the Council be responsible for managing the additional strains on stretched services and crumbling infrastructure? I doubt it impacts Statements. Finally, if the Local Plan proceeds without amendment, prior to implementation, the Council should produce statements detailing the plan's anticipated impact , especially relating to green belt land, on: Existing infrastructure (i.e. the road network, pathways; cycle ways and byways) Historical sites and landmarks; Wirral nature and wildlife; The health and wellbeing of its population; The effects of development on tourism Factually, WBC has yet to show that an exceptional need arises to develop green belt areas. In my opinion the WBC Local Plan 2018 will be a Wirral disaster, which if implemented , cannot be undone. The calculations of required dwellings are not credible, are not based on fact and are basically no better than a stab in the dark. The Local Plan should not be presented in its present form. If the Government decree that 12,000 houses must be built over 15 years that number must be challenged under S44 of the Government's Document "Planning for the right houses in the right places". The Council is not employed by the Government but by the council tax-payers and, for once, should act in their best interests. The Secretary of State should be provided with a plan which is representative of Wirral based on provable facts and not a fiction. When the green belt land, with all of its benefits, is gone it cannot be reinstated. Wirral will be left with industrial and urbanised megaliths in its place. What will future Wirralians think of us?</p>

DOR REF	RESPONSE
DOR00251	<p>The time has come to drop the preteens that the target for Wirral of 800 new homes per annum comes from the government. It does not. My researches show that the figure comes from You, Wirral Borough Council and not Government. I now have it in writing from the Ministry that this is the case. I find that what happened was:- In 2010 WBC gave planning Permission to Peel Holdings who undertook to build 13000 houses during the relevant period. You employed independent experts (Nathaniel Lichfield & Partners) to advise as to future housing needs. They did so on May 2016 and you accepted their figure as 800dpa and informed government accordingly. I am satisfied that you did so in good faith because you had Peel Holdings in the bank. The Chinese withdrew their support from Peel Holdings and they in consequence reneged on their promises. You were left with an untenable promise to Government and hence the present dilemma. I have no qualification in Local Government, Housing or Planning but I do have many years experience in understanding the arcane opinions of experts in other fields. I have had the unfortunate experience of reading NLP's 250 page report, which is why I say I am satisfied that you accepted it in good faith. However, based on the assumptions they (NLP) make you can come up with any figure you wish. All predictions in 2001, 2012 and 2014 assume an increase in Wirral's population in the future. In fact there has been a net negative migration on our settlement area every year from 2001 to date. Put in English the population of Wirral has fallen every year and 4 and 6 years respectively have passed since the 2012 and 2014 predictions. Put another way NLPs and WBC's projections have already been shown to be fundamentally flawed. So what is the way forward? The answer is reassess the need. I suggest you re read paragraphs 14.26 and 14.27 of NLP's report. You are entitled to reduce the figure by % to one which can be accommodated within brownfield sites. In any event you may repeat the process to come to a proper figure. The word which NLP unhelpfully use is 'iterate' . You may then take account of the actual position in Wirral today not that of ONS statistics which apply a broad brush approach to the whole of England and Wales. I write as a resident. I have serious views about individual parcels of greenbelt which must not be released in any event, but that is for another day.</p> <p>I write on behalf of my wife and myself in response to the Notice served on us by way of the Development Options Review, in particular site references SP61/62 and the other sites in Barnston. My views about the overall plan have already been made known to the Council on a previous occasion. There are principally 5 reasons why none of these sites should or indeed could be made available by being removed from existing green belt. 1. Barnston Road is an accident blackspot. As long ago as 2005 while considering the exclusion of articulated vehicles from Aldi from the road WBC and Barnston Conservation Society each commissioned reports which said the same thing namely that introducing such traffic would lead to death or serious injury. Since that date WBC has recognized the road as a blackspot by placing warning signs to that effect at either end. Since that date traffic has increased incrementally. If you build 50 houses on any of these sites you increase the vehicle numbers by 100 and thereby take the foreseeable risk of serious injury or death. Any death which followed would make the Council liable for criminal prosecution for Corporate Manslaughter. No consolation for the Deceased. 2. You build houses near to a reservoir at your peril. As the 1975 Act recognizes any serious accident at the reservoir would have catastrophic results. Don't rely on United Utilities, they take 7 years to act. 3. The houses built around Gills Lane were joined to the existing sewer system which runs through Barnston Dale field parallel and in places in Prenton Brook which runs into the River Birkett. 10 years ago that sewer burst in several places polluting the brook and causing sink wells in the field. It took the Society 3 years to get United Utilities to admit that it was their sewer and a further 4 years with the help of the MP to get them to repair it. It now runs to full capacity. Any building in that area would require massive new infrastructure costing many millions. 4. All the land under consideration is presently farmland. Any building on that land makes the acreage automatically unviable. To do so would also be contrary to the Councils avowed policy towards the support of agriculture. 5. In any event land may only be removed from the greenbelt in Exceptional Circumstances. Exceptional Circumstances are a matter of Law and not the will of the Local Authority. In particular the preparation or need for a Local plan is NOT an Exceptional Circumstance. [case law referenced] I am confident in saying that removal of any land from this green belt is almost certainly unlawful and will be challenged in the Courts. I say almost certainly as my experience is as a Criminal Lawyer for 50 years and planning was never my speciality.</p>
DOR00252	<p>The rowing club is very pleased to see employment uses being proposed for the following sites: ELPS079 – Bidston Dock ELPS081 – Former RHM Mills ELPS357 – Former Mobil Lubricant Refinery Site If possible, port-related (or uses benefitting from adjacency to the port) would be preferred for the former RHM and Mobil Sites. The club has no comment to make on the future mixed used of SHLAA0557, the Beaufort Road site. In making these comments, the rowing club wishes to be assured that development of the sites adjoining the club will not have an adverse effect on the club's operation, particularly in relation to traffic movements around Wallasey Bridge Road. The club would also wish to be assured that its existing use, as a rowing club, with access to the water of the West Float, is not compromised by proposals within the Development Options Review. Have Peel Ports confirmed their continuing interest in port operations on current operational land? The maintenance of active commercial traffic in the dock system ensures that the system is maintained to the benefit of the club's activities. In any future development proposals, appropriate landscaping proposals for the Wallasey Bridge road frontage and the incorporation of cycle and public transport facilities would be welcomed, as they improve the image of the area and provide safe routes to the rowing club complex. This is particularly important as the Club has a large number of junior members, who frequently use public transport to access our site.</p>
DOR00253	same as DOR00177
DOR00254	<p>The car park in most days is full, and it is closed in order to build housing then the existing shops will lose trade and a small number of occupied housing will not supply sufficient customers. Where will employees working in the village park? In addition to there is a proposal for housing to be built on the ex-Acre Lane School site. is there sufficient schools and inter structure to accommodate more families?</p> <p>As far as I am aware this centre is still used, but if it is to be replaced by housing and shops then car parking will be required. There are shops standing empty in the village so why are more shops required.? We therefore are of the opinion using the car park for housing is a poor idea.</p>

DOR REF	RESPONSE
DOR00255	<p>We would like to register our objections in the strongest possible manner to proposal SHLAA2025 in which it is proposed that the Allport Lane Car park Bromborough be included in the Statutory Local Plan with a change from its current use to the designation “mixed use including housing”. The Allport Lane Car Park is vital to the success of local businesses by providing a convenient and free parking location not only for the businesses but also for community access to the Library and Public halls which are continually in use by local residents. The library provides a vital information and social service whilst the associated halls provide accommodation for numerous organisations all of which make a very important contribution to the social welfare and the physical and mental health of the community. Without these facilities the entire village would become a dormitory and would have neither social nor commercial centre. Any action to remove these incredibly important facilities would sound the death knell for Bromborough as a vibrant community and must be strenuously resisted</p> <p>We would like to register our objections in the strongest possible manner to proposal SHLAA2024 in which it is proposed that the Civic Centre Bromborough be included in the Statutory Local Plan with a change from its current use to the designation “mixed use including housing”. The Civic Centre is a vital hub for the community providing Library and Public halls which are continually in use by local residents for library services and a wide variety of social gatherings. The library provides a vital information service and social service whilst the associated halls provide accommodation for numerous organisations all of which make a very important contribution to the social welfare and the physical and mental health of the community. Without these facilities the entire village would become a dormitory and would have neither social nor commercial centre. Any action to remove these incredibly important facilities would sound the death knell for Bromborough as a vibrant community and must be strenuously resisted</p>
DOR00256	<p>I am writing in reply to your dated 3 September addressed to the occupier on Allport Road, Bromborough. This house and the surrounding land marked on the plan you sent with your letter is owned [land owner] Any future correspondence should be sent to the Secretary of this company at [address]. This is to advise you that the company has no objection to the land being included in the Wirral Local Plan. Indeed we have for some time been considering whether to apply for planning permission of the land surrounding the house, which is currently let to a firm of Consulting Engineers.</p>
DOR00257	<p>I am writing to register my objections to the prospect of selling off Green Belt land in various areas of Wirral for building. Many others have written and spoken eloquently on this subject. Below are some comments I would like to make: Principles: This Labour-controlled Council seems to be flying in the face of the basic Labour principle, so trumpeted during the last election campaign – ‘for the many, not the few’. It seems to be prepared to sell the Green Belt land – a finite resource – to the highest bidder, despite previous ‘brownfield first’ promises, in order to build expensive houses (paying higher Council Tax) for people already on their way up the property ladder. Previous Land: Green Belt land helps to make Wirral a desirable place to be, both for residents, visitors (who boost the local economy) and wildlife. Much of it is rich and productive farmland, which cannot be replaced and which in future we may need even more than we do now. Pricing: Pricing out the locals is no way to win friends – or votes. It is not possible to market Wirral on its heritage, countryside, views and leisure activities whilst building on chunks of said countryside and taking steps to put living here beyond the reach of many young/low income Wirralians. Property Types: Wirral’s most urgent need is for affordable housing and single person housing, not luxury homes. This may be less attractive to developers wanting to make a big profit, but it is what Wirral needs. Surely the Council is supposed to serve the needs of its voters first and foremost? Why is this not happening? Why is the Council letting its people down so badly? Planning: all these highly publicised threats to Green Belt are based on unrealistically high targets set for house-building. These figures need to be challenged immediately. Selling the family silver’ is not the answer; once it’s gone, it’s gone. Plans by Peel Holdings to build on Wirral Waters need to be expedited without any further delay. Other developers with plans for house-building approved, but who have not yet started work, likewise any ‘land bankers’ need to have pressure put on them to get to help the Council show the Government it is making an effort to meet its targets. Promises, promises...finally, if the Council would put as much money and effort into planning for affordable housing on brownfield sites as it has into the ‘Golf Resort’ vanity project, which would destroy Green Belt land and is by no means guaranteed to be a success. Wirral would also be a better place for those who live there – and for those who at present cannot afford to do.</p>
DOR00258	<p>I write to confirm my support for your decision to withdraw land recently allocated for potential residential development between the Wirral Way and Dee estuary adjacent to Wittering Lane and Davenport Road, Lower Heswall. I attach to this correspondence my earlier submission dated 12 September and the 15 November 2017 in support of this decision. I wish to object to the allocation of land for residential development on Seabank Road, Riverbank Road, Manners Lane and Wittering Lane – Lower Heswall, as part of the SHLAA on the following grounds: · The land is situated in the greenbelt. The importance of the greenbelt in determining planning applications and related matters should not be underestimated. Policy GB – guidelines for development in the greenbelt – clearly identifies the types of permitted development in the green belt, and this does not include the new build residential premises aimed at meeting social housing targets. Similar views are expressed in the core strategies for Wirral proposed submission draft (Dec 2012; para 6.13 and policy CS3 – greenbelt). These policies, both current and emerging serve to underline the incompatibility of allowing residential development in the greenbelt, and should therefore form the basis for refusing any further consideration of these sites from the assessment process. Furthermore, there are no ‘special circumstance’ identified by the assessment which weigh in favour of the proposed sites and offset objections to their development in the greenbelt. Finally I wish to underline the fact that these sites fall within the ‘undeveloped coastal zone’ which gives added emphasis in policy COA1 to the protection of the greenbelt between the Wirral Way and the Dee estuary.</p>
DOR00259	same as DOR00177
DOR00260	same as DOR00177

DOR REF	RESPONSE
DOR00261	Land at Saughall Massie including MS602382 SHLAA Ref 1770 (CALL14/011} The above land was not included in the recently issued PROPOSED GREEN BELT SITES FOR FURTHER INVESTIGATION or the PROPOSED GREEN BELT BOUNDARY CORRECTIONS I wish to request that the above land, of which I am a part owner, be included in the Proposed Housing Allocation for Housing, Employment and Mixed Uses and Sites for further investigation in the Green Belt. This triangle of land, which includes MS602382, is ideal for development. It is a clearly defined area being bounded by Saughall Massie Road, China Farm Lane and the existing houses of Newton. It is conveniently located approximately two kilometres from West Kirby town centre with its wide range of facilities. The land is approximately 5 kilometres from the M53 spur giving easy access to the motorway network and to the Mersey tunnel. I request that you give serious consideration to the inclusion of this land in the investigation for green belt land.
DOR00262	I write to complain in the strongest possible terms about your Local Plan. I complain on the grounds that:1. We do not need 12,000 houses; the proposed increase in local population, by your calculations is only 5,500 people by 2038. 2. There are no current or proposed employment opportunities, which may increase demand for housing. 3. The Wirral Waters site is large enough to build 13,000 houses. If Peel Holdings will not build them, I suggest you subject them to a Compulsory Purchase Order', and sell the site to another builder. 3. 46% of the Wirral is already covered by houses; under your plan 67% would be covered. We have a successful local tourist industry, why jeopardize it by covering the area with houses. Development of Pipers Lane 1. There is lack of access to the land at the eastern end of the lane. 2. The current surface of the Lane is unsuitable for the number of heavy wagons, which would be required to build the houses. 3. There would be a significant increase in the level of traffic using the lane, after the houses were built. We are already suffering from a collapsed drain, potholes, and a leaking gas main caused by wagons supplying the current developments.
DOR00263	I am writing to express my concern following receipt of the letter from the council outlining planning for house building in Thornton Hough. I live in the small estate here in Thornton Hough which is surrounded by agricultural land, and further development would certainly have a detrimental effect on the openness of the green belt surrounding my property. This is a unique village within the Wirral and the council should be looking to retain this part of the area rather than considering house building, especially with the planned forthcoming Wirral Waters development and the confirmation that 4000 -6000 empty units could be brought back into habitable use. This would release sufficient numbers to enable the council to attain government requirements. Recent figures released by the office of National Statistics state that the original number of houses which they estimated should be built in the Wirral over the next 15 years has been downgraded and that again would indicate and confirm that the green belt around our village should not be violated. I hope the council will think again over these plans and confirm the retention of the green belt land surrounding our village for the present and future generations.
DOR00264	This is a 'begging' letter in a way, to You/The Council. Please, please leave our remaining green belt land alone/untouched, whatever such land remains is limited in amount, after all Wirral is almost an island. We already have a high density 43% built on, compared to Cheshire 10%, UK as a whole 6%, moreover, should we exit the EU we will need as much farming land for cattle/crops as possible, putting houses on such land as remains? The Government figures for housing we are informed has come about because Wirral Council has not submitted any housing 'figures' for some years.....why not? Researchers with a means of calculation now advise that UNDER 500 houses/units per year will be required over 15 years i.e. in total approximately 7000+ . We understand Peel Holdings is forecast to deliver from 'brownfield'/derelict areas over 6000+ units over that time, plus the Council during that period has upwards of 6000 properties requiring remedial work apart from brownfield sites identified for development. So please kindly explain the justification for building on greenfield land ? It cannot be replaced. "Brownfield" usually means existing drainage/light/heat utilities cheaply accessible, local transport more likely, schools, hospitals/shops/sources of entertainment/sports facilities I could go on but it means less reliance on cars, less congestion (Wirral roads!), less damage to the atmosphere. Put new houses away from all the services I've just referred to, and it can result in unhappiness/ expense and frustration. I stood outside the Town Hall 10th Sept, with a cross section of residents representing many more folk from all walks of life/housing backgrounds, we all were of one mind LEAVE OUR GREEN BELT ALONE/UNTOUCHED. I opened with begging, but the more I've put down, how can the Council possibly justify having to build on what is remaining of our precious green 'spaces' it would be a travesty/appalling.
DOR00265	I write concerning the LOCAL PLAN, and potential infill village in the green belt at Oxford Drive Thornton Hough. This area is part of the Thornton Hough Rural Farmland Landscape Character Area, and is unsuitable for release from the green belt or to be built on. The Oxford, Drive estate itself is surrounded on three sides by Agricultural land, which is in use. The strategy for this area is "conserve" and any changes to the area would reduce the local distinctiveness of the village and would crease the prominence of roads or urban edges. The development of brown field sites that could be brought back into use in the Wirral will more than suffice the government's requirement for new house build. It is also obvious that that the figures being used bear no relation to the actual need of our area. Therefor the council should not be agreeable to the boundaries of our green belt being redrawn at all and should certainly not agree to any building in an area at the centre of the green belt. All the objections put forward by me on the proposal for building of the ECV care village in Thornton Hough are also applicable to this proposal. Please refer to these also. Building on our Green Belt should be protected for future generations, especially on the Wirral Peninsular, which is unique.

DOR REF	RESPONSE
DOR00266	I understand that the Council is proposing to reassess the Green Belt land in the Pensby area with site reference SP062 in addition to other areas of Green Belt on Wirral. I believe that areas of open country land on Wirral should be given very careful consideration and, where possible, tenaciously protected from housing development, the need for which has I believe been exaggerated and is not at the level of 800 dwellings per annum. The Council must therefore be sure that it is not giving up our Green Belt unnecessarily and should look again at ways to satisfy the Government. Once Green Belt is lost it is gone forever. Wirral is a special place with areas of farmland, countryside, biodiversity and varied habitat, the envy of many. We should think of what we will be losing to the detriment of our children's health and quality of life. Of particular interest to me are the documents and data on your website relating to area SP062 and specifically Pensby Road on which I live. Pensby Road is a splendid main road lined with protected mature trees of various species, alive with wildlife in places, such as collared doves, jays, crows, squirrels etc. I have read that submissions have already been made in area SP062 for land that borders Pensby Road, namely SHLAA ref. 1946 and 1981. Your website also shows that area SP062 is pencilled in for the largest development with the possibility of 1882 dwellings being built. This is horrendous. It is the highest concentration of any of the parcels of land under investigation and is disproportionate and highly unreasonable especially as elsewhere on your website parcel 1946 is listed as LCR Core Biodiversity area. The part of area 1946 that borders Pensby road is alive with wildlife and is lined with closely placed, majestically tall mature trees. It would be almost criminal act to disturb or remove any of these trees, and it will have detrimental effect on the Pensby area, which is just as important and valued as Barnston and in addition it will adversely affect the value of properties on Pensby Road including mine. Hopefully it will not come to that and the Council will make wise and fair choices and preserve Pensby Road in its present state.
DOR00267	same as DOR00177 [and additional signatories to petition attached]
DOR00268	I am writing as a Resident of over 56 years in the above village. I am appalled at the idea of this very unique village being a location for house building on what was, and still is, Green Belt area. There are few places left now with the history and uniqueness of this type of village being preserved. In the case of Thornton Hough as an example, the Village Smithy, the historical Seven Stars Inn (as it was known originally). all the Farms, and agriculture, and general ambience. I doubt we would ever win the "Best Kept Village" again in the future once all this housing has been developed. Such a shame. I think modern housing will look completely out of place, and will alter our way of living more than we realise if this goes ahead. I am elderly now, but came here in 1962 as a new Bride. My children and grandchildren have enjoyed growing up here and I had hoped future generations could have the same opportunity as I have had in this lovely UNSPOILT village.
DOR00269	I am writing to object to the Local Plan proposal to develop on the Allport Lane Car Park in the centre of Bromborough. The car park is very well used, and if the development were to happen, it would have a significantly detrimental effect on Bromborough, creating parking difficulties and jeopardising the livelihood of local businesses. People would have to park on surrounding roads, causing traffic congestion and increased risk to pedestrians. As a resident of Bromborough, I regularly use this car park, and am astounded that it is even being considered. I am writing to object to the Local Plan proposal to develop on the site of the Civic Centre and Library in Bromborough. The Civic Centre and Library are at the heart of Bromborough and both are well used by local people. Removing these facilities will impact on a large number of people. Numerous events are held in the Civic Centre and benefit the local community. The library is an asset to the village, and of significant recreational and educational value. As a Bromborough resident, I am shocked that the council would even consider such a proposal.
DOR00270	Site Reference: 3040 Relatively small modifications to the proposals could mitigate the problems foreseen. The properties having vehicular access via Meadows Road should be reduced to, say 4. This would limit the traffic flow along this frequently congested route and at the junction with Allport Lane opposite Mendell Primary School. More, preferably all, of the existing trees should be retained. This is particularly important with the current concern about the effects of climate change. Trees absorb CO2 and other pollutants from the air and building of 200 more dwellings will add to the production of these contaminants. Also, they are important for their role in taking up water so minimising the possibility of the flooding to which the site is vulnerable and will be exacerbated by covering more of the surface with buildings. In addition, trees create an attractive environment and so contribute to the feeling of well-being of the population. The layout of the new properties should be adjusted so that the 'car parks' associated with the mews style houses are not sited so close to existing houses. For example, they could be sited against the background of the group of trees which were adjacent to the old school buildings to the benefit of both new and existing residents. I believe there is ample space for these changes to be achieved without any reduction of the number of new houses built and I believe the developers should be asked to adjust their plan.
DOR00271	Please register my Objection in the strongest possible terms, to the proposal by Wirral Borough Council, to release vast tracts of Greenbelt Land for development. 43% of Wirral is already built on and The Secretary of State wrote in March 2018 that Wirral 'is not an area of high housing pressure' It has also been stated that the population of Wirral is declining. I have attended a number of open meetings called by the Council and have not been persuaded by any arguments that it is necessary to release any Greenbelt land. I list below some of my reasons. And general observations. At the outset, the Council was ordered by the Government to file a local plan or the Government would intervene. A map was issued showing where the Council was considering land would be available for development. This appeared to show every green field and as potential development land, outlined in red and given a plot no. The distress and upset to residents cannot be underestimated. National Guidance states 'Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified.' Following various submissions and objections, the Council then issued this Consultation period with a deadline of the 26 October for objections to be received. It became clear early on that figures the Council quoted at their presentations were not up to date and subsequently the ONS have released revised figures. I would submit that with the planning applications already in from Wirral Waters/Peel Holdings, there is the potential to deliver over 6,000 houses over the next 15 years. To these figures should be added the many empty houses which the Council could refurbish and bring back into occupancy, thought to be in the region of 1,000. There are also many family houses in the Heswall area (and I have no doubt in other areas of Wirral,) that have been demolished and planning has been granted for multiple

DOR REF	RESPONSE
	<p>apartments. Boarded up plots of land and where buildings are no longer used, should be built on. A letter received from W.B.C regarding the Development Options Review, directed me particularly to Appendix 16 of the Initial Green Belt Review Background Report (September 2018) where SP99, 101, 102, 103 part 104 and 110 were referred to. These parcels of land refer to the prime Agricultural land and fields between the Dee Estuary and the Wirral Way. They are referred to as 'possible infill villages'. Should this land be approved for development, the openness of the countryside and the Estuary would be severely compromised. welcome the suggestion that the area remain part of the Green Belt, but would object very strongly to seeing the area as some sort of 'add-on village'.</p> <p>It should be noted that there is no infrastructure in this very rural area of Wirral. There is only one access road from the marshes to each end of Lower Heswall Village and then up to Heswall. Lower Heswall has minimal shops having lost its Post Office, Butcher and Green Grocer. Wittering Lane is a single width narrow lane, having a poor road surface and liable to flooding. Park West has difficulties with its sewerage when there is heavy rain. Adding more housing would only add to these problems. This area and the others which abut the Estuary are rich in wildlife habitat. When there are very high tides, flocks of waders can be seen feeding on this land. Wirral Borough Council has its Landscape Policy in relation to Dee Coastal Farmland. The Estuary itself is of national and international significance and is designated as a Ramsar site and a Site of Special Scientific Interest. I would ask that the Wirral be considered and respected for the very special area that it is. The fact that it is a Peninsular limits the possibility to develop outwards but to cover the remaining beautiful land with development will be harmful to the wildlife, the beauty and the potential for others to visit and see this wonderful area. People visit the Wirral for a number of reasons, but particularly to walk along its unspoilt lanes, public footpaths and open areas and to see its diverse wildlife. I write to express my dismay at the local Council's extremely damaging proposals to include valuable parcels of Wirral Green Belt in the list of sites available for Development. Before expressing my objection in detail I must point out that I am horrified that Wirral Council is causing so much distress to Wirral Residents by indiscriminately including so many Green Field Sites in the earmarked site maps. This distress could have been avoided by Wirral Council addressing their legal obligations timeously. The Council's failure to produce their plan within required time limits has resulted in so much un-necessary upset. In my view Wirral Council's listing of possible sites fails to address the following: • The Council's priority should be to maximise the use of Brown Field Sites in preference to Green Field sites. • The Council's plans should have been refined to only include sites where the existing infrastructure can cope with the transport, education and medical needs of the residents of the new housing. • The Council's plans need to be based on a realistic assessment of housing needs locally. Recent Government figures demonstrate clearly that the housing requirements outlined in Wirral Council's papers are wildly unrealistic and over-stated. • Wirral Council have failed to fulfil their legal duty to submit a plan and have sought to blame Peel Holdings Wirral Waters Development when Peel have always made it clear that their plan is a very long term plan and needs to be economically viable. Added to this, Wirral Council have been obstructive in the planning process & then sought to blame Peel Holdings. Appalling behaviour. • Wirral Council has not adequately addressed the need to bring unoccupied housing back into use. • Wirral Council has not demonstrated that they have followed up with Developers who own "Land-Bank" sites and are not yet actively following up with developments. • Wirral Council's plan ignores the importance of Green Belt to the Residents of Wirral and to Visitors to Wirral. • Wirral Council's fixation with the Hoylake Golf Resort Plan (which is also damaging to Wirral's Green Belt & Ecologically important site) and is totally unrealistic and counter-productive. Wirral does not need all of the golf courses currently in the area, as is clearly demonstrated by Wirral Council's failure to sell its municipal Golf courses & more recently by the Insolvency of Mack Golf which operated a number of such golf courses in the region. In addition, the housing proposed in the Golf Resort Plan is in fact totally unsuitable for solving any of the housing shortage that Wirral Council needs to address. An extremely costly "Vanity Project". To close, I believe that Wirral Council's approach to this issue smacks of Political Plotting and a total disregard for the feelings of the Residents of Wirral. Please record my OBJECTION to the proposals.</p>
DOR00272	<p>It seems clear to me that this whole panicky rush to cobble together a Local Plan at the last minute has only come about because you, the Council, believed that Peel Holdings were going to wave their magic wand and solve all your problems, at a stroke. It removed the need for any further planning or provision to be made -- a classic case of having all your eggs in one basket, with all too predictable results. When Council Leader states, in his August letter that in 2010 Peel Holdings 'promised' they would build 13,000 homes was this backed by a legally binding contract ? I suspect not. Peel Holdings are well known for being ruthless in their business dealings, any verbal comments by them could quite clearly not be relied upon. When so much of the Local Plan depended on it, it must, surely, have been obvious that this needed to be legally binding. They now have the Council over a barrel and are in a position to force more concessions over infrastructure and grants as they see fit. This is why the Council is now in the invidious position of desperately seeking any quick-fix solution to the problem including denuding the Wirral of its green lungs and some of the outstanding natural features that make this such a pleasant place to live. The figures of population growth and, therefore, housing needed now appear to be greatly overstated. What is now needed is an intelligent assessment of the likely homes needed backed up by the calculations used and source material utilised. This needs to be broken down district by district and a comprehensive programme drawn up, open to public inspection, of how this can be achieved. Any attempt to build on Greenbelt land must be genuinely contemplated only when all other options have been exhausted not the disastrously cobbled together pin-the tail on the donkey amateurish method that is currently being proposed. Perhaps the mighty Peel Holdings needs some real pressure putting on them to force them to bring forward their building programme, which will, in turn, take some of the pressure off the Council. For heavens' sake let's, at this eleventh hour have some professionalism (and some backbone) from the Council.</p>
DOR00273	Same as DOR00177. [Additional signatories to petition attached]

DOR REF	RESPONSE
DOR00274	<p>1. Housing Needs Target The housing needs target of building at least 12,000 new homes by 2035 in Wirral is outrageous. This is a small peninsula and the figure is excessive and unsustainable. We don't have the demand, or the infrastructure to support such a figure. Although subsequently reduced somewhat, the revised figure is still too high and should be challenged further.</p> <p>2. Potential Infill Village in the Green Belt, Thornton Hough I object to this proposal on the grounds that this is a small village of historic interest, in a conservation area surrounded by prime agricultural land. Any further development would have a hugely detrimental impact on the character of the village. There is no justification for this proposed development, as there are many alternative brownfield sites across Wirral that should be developed before any encroachment on to Green Belt land is considered. Don't smother our small villages and sacrifice our history, when there are other alternatives available.</p> <p>3. Green Belt I object to any development on Green Belt land. Wirral is a small peninsula that already has a high percentage of urban areas and our remaining green and open spaces must be protected. There is no justification for taking Green Belt land when there is so much opportunity for development of brownfield/urban sites. The Local Plan should prioritise brownfield/ urban sites and any consideration of development on Green Belt should be deferred until brownfield sites have been exhausted. Taking Green Belt land should be an absolute last resort. Preserving our Green Belt is also crucial to the health and wellbeing of Wirral residents. The benefits of access to green spaces is well documented and evidenced. Our environment must be protected. Regular reviews, post EU Exit, should also be built into the plan, providing an opportunity to take stock and reassess housing demand</p> <p>4. Wirral Waters The Council must proactively pursue this and explore options to compel Peel Group to develop this area, especially as it would more than meet future housing needs and would in turn enhance the area. Given the recent announcement to lift the ban on borrowing, could not Wirral Council compulsorily purchase the land from Peel Group?</p> <p>5. Empty Housing Stock We all know of properties sitting vacant. The council should take action to reduce this number and introduce them back into circulation. This would contribute towards meeting housing needs, without the need for extensive further development.</p> <p>Views on Future Housing Needs Based on discussions with family and friends:</p> <ul style="list-style-type: none"> • We don't need yet more luxury/ executive homes- there are more than sufficient expensive, large properties on Wirral. • We need modest, affordable homes for every day Wirral resident, suitable for first time buyers, those wishing to downsize, single people, small families etc. • We'd like to see more bungalows- these are in very short supply, yet there is a real demand for them. • Talking of which, planning officers should restrict significant alterations to existing bungalow stock - please protect these properties so that they remain available for those requiring a bungalow. Too many buyers see them merely as a means of transforming them into a large, extensively altered property, and the bungalow is lost forever. • Please ensure that any new development has a percentage of green, open spaces incorporated within. So important for the health and wellbeing of all and for children to enjoy.
DOR00275	<p>As a member of the Friends of Storeton Woods, who is concerned that this area of Wirral should remain a haven for wildlife, and the people who love to walk through every season it gives us, I am very alarmed at the proposal to remove large areas of land from the green belt for housing development. I read in the latest 'newsleaf' from our editor, that the green belt boundary from Mount Road and the M53 is to be removed. How much of a danger is to be to our lovely Storeton Woods. I read that Storeton Woods 'will be protected' – against ambitious housing developers – I wonder how long this protection will last. The Woodland Trust is also against this plan. It's bad enough to hear that fracking is to go ahead in Lancashire, but to hear of the threat to our green belt areas is really bad.</p>
DOR00276	<p>Whilst acknowledging that there is a national housing shortage,, I believe that building on Green Belt sites is not the answer as it inevitably results in building low density, relatively expensive homes which are unaffordable by those who desperately need suitable accommodation which is within their financial means. Green Belt land is more profitable for developers as generally it involves less land preparation work and is more attractive to potential wealthier buyers who can afford to pay a premium for sites,, generally surrounded by countryside, and which are also convenient for access to major towns, cities and amenities. There is clearly a great financial benefit for developers to argue for the release of Green Belt, to potentially exaggerate housing needs and to build properties which make a greater return on capital and so a greater profit than those that meet the needs of affordable social housing. National Guidance NPPF2 states that "Once established Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation of updating or plans". Government appears to be pressurising Councils to deliver unrealistic targets and to release Green Belt land rather promote the utilisation of Brownfield, Windfall and Redevelopment sites in preference.</p> <p>I believe that Wirral Council's review does not effectively meet the ""exceptional circumstances" requirement as the priorities seem to be more towards release of Green Belt, not towards development of Brownfield and other alternative sites which would better meet local social housing needs. The Council would appear not to have exhausted all other reasonable options to meet Wirral's development needs in the relatively short period allowed for current consideration and consultation. It is regrettable that Wirral has not developed a Local Plan much earlier which would have allowed better evaluation of alternative options available to increase and improve housing stocks in the area by examination and analysis of statistical information over a longer period. I believe that the Council's calculations of housing need in Wirral are flawed as regards to the buffer, which does not increase the number of houses to be provided but merely the timing of such provision. I question that, in a period of projected falling population, the figure of 12,000 additional new homes needed in future is an overestimate and hence the computed 15 year shortfall in housing is unrealistically high. I question whether based on the latest Office for National Statistics figures, this figure "for need" in Wirral is accurate. I understand that there is considerable opportunity for developing and regenerating Wirral Waters' sites with Peel Holdings and question why it appears that this process has apparently stalled. I concur with concerns and representations being made to Wirral Council by the Heswall Society.</p>

DOR REF	RESPONSE
	<p>Specific Local Comments I am pleased to note that the Council acknowledges the importance of the land lying between the Wirral Way/Davenport Road and the Dee Estuary as part of the protection and pleasant scenery of the Dee coastline. I am very concerned at the proposed release of green belt (SP058C to 058E) at Pipers Lane and potential housing development (SHLAA 0708) at the Akbar since these "land locked" areas would detrimentally add to the difficult vehicular access through the local narrow and undeveloped roads, many even without safe footpaths. I understand that previous planning applications in these areas identified badger setts and that there is a protection of wildlife issue in these locations. I am also very concerned at the large size of the proposed release of green belt land at (SP062) West of Bamston Village and the effect this would have on traffic density, road safety and the pressure on local infrastructure amenities such as local schools, transport, medical centres and the general pleasant rural environment we all enjoy</p>
DOR00277	<p>Observations on the proposal to consider housing development in the Green Belt coastal area in Lower Heswall:</p> <ol style="list-style-type: none"> 1. Validity of Housing Requirement There is no justification for the number of houses the Council says it is obliged to build. I understand the Government have revised the number required down to 500 per annum over the next 15 years. The Council is hiding behind phoney figures to justify building on Green Belt. This being so, there is no need to destroy our precious green belt. There are ample brown field sites in Wirral, which would greatly benefit local communities. These may be less profitable to developers. The Council should put the wishes of residents above those of developers. I am told there are between 4,500 - 5,000 empty properties in Wirral. I would suggest that ensuring these houses are utilised rather than encroaching on Green Belt. The document, National Planning Framework (NPPF2) states that Green Belt boundaries should only be altered "when exceptional circumstances are fully evidenced and justified." There are no such circumstances in this case. 2. Consultation Process The consultation process is flawed. The initial consultation in 2017 received very limited publicity. The current process is not fully transparent and the information provided is confusing, contradictory and incomplete. For example the document entitled, Initial Green Belt Review - Background Report (September 2018) states in paragraph 6.4 that "Land to the west of the Wirral Way has not been included because of the role of the Wirral Way in defining a clear physical edge to the existing urban area and the contact associated with the national and international designation of the Dee coastline." Yet, cunningly concealed in an appendix (16) there is a reference to infill villages. This appears to be a ploy to circumvent the rules pertaining to the Green Belt. The few houses on both sides of Riverbank Road and those between Riverbank and Seabank Roads have been there for over a century. They in no way constitute a village and are physically separate and distinct from the urban area of Heswall. Building on these areas would simply allow the sprawl of the urban area into the Green Belt, destroying the character and beauty of this area. 3. Environmental Effect We have been fortunate to have lived at this address for 33 years. Our children grew up here and our grandchildren now relish the openness and freedom when they visit. People come from other areas to enjoy the Wirral Way which has uninterrupted views of the Dee Estuary and the Welsh coast. The proposed building would destroy that beauty and peace. Building on the fields adjacent to Riverbank and Seabank Roads would be catastrophic for wildlife. The area is rich in wildlife: migrating birds who often feed in the fields, foxes, voles, badgers etc. Their habitat would be destroyed. Our Council should be fighting to preserve not destroy such a precious resource. The fields in question are prime agricultural land. We are likely to need more home produced food in coming years. It makes no sense to build on the very land which provides our food. 4. Infrastructure The field between Riverbank and Seabank Road is already prone to flooding. Despite the installation of a storm tank on Riverbank Road, raw sewage is still discharged into the estuary. The proposed development would lead to more flooding and pollution. The access to and from the proposed site would be a nightmare. Davenport Road is, in effect, part of the Wirral Way and used by many walkers, cyclists and horse riders. Apart from trashing the idyllic nature of the area, there would be the risk of accident from the huge increase in traffic. 5. Economic When we moved here with our family in 1985 we paid more for this house than for a similar house in an urban area. In other words, the location attracted us more than the house itself. Like most people, our savings are in our house. As we approach old age we may have to use this asset to fund care. Devaluation of the property will make that difficult if not impossible. Already I have heard of a sale of a property on this road being stalled because the purchasers have heard that the fields have been bought by a developer. Is it any wonder that we and other residents are suspicious of collusion between the Council and developers? If this consultation is to mean anything, then the proposed development of our local Green Belt cannot be allowed to happen.
DOR00278	<p>We are writing to inform you of ours and our neighbour's very strong objections to the proposed plans for future development on our precious Green belt land. As you can see from our address, it seems that proposed land near our property is also being considered under site reference SP060. , to have the opportunity to be able to live near this environment is what we wanted. Now we feel this could be taken away from us. We have the pleasure to live in and be able to witness what a valuable asset this Green Belt land is. The sheer enjoyment, we observe when families with young children, groups of walkers and dog walkers using the woods and fields for a day out, proves how valuable this is. This is a great social activity, to be able to participate in, especially when the Government is trying to encourage healthy life style for all. It is not only local people living close by who uses these areas, but people come from afar in their cars, sometimes two or three car loads of people coming together to walk in the woods. We feel that there are other solutions. In our opinions, what could be done is the redevelopment of brownfield sites. Derelict sites within cities and close to their economic and social opportunities should not be ignored in favour of cheaper or more convenient sites for developers. There is plenty of brownfield land available for development as indicated by various researches. It has been found that brownfield land is far from drying up. We have to acknowledge, the need to protect and preserve areas of natural beauty for future generations. "You don't know what you've got till it's gone" Joni Mitchell sang in 1970 these words are so true.</p>

DOR REF	RESPONSE
DOR00279	<p>The Ramblers Association Wirral Group is part of the Ramblers Association, the national charity whose goal is to protect the ability of people to enjoy the sense of freedom and benefits that come from being outdoors on foot. The Wirral Group has a direct membership of more than 750 and additionally there are a number of local walking groups within the Borough affiliated to us. Whilst our walks programme focuses on further afield destinations at weekends, our year round mid-week and summer evening walks programmes choose closer destinations, many being on Wirral. Already the level of open countryside on Wirral is limited. It is essential to maintain as much of this limited valuable resource as possible and thus maintain existing green belt boundaries as far as possible for the residents and visitors to our attractive Peninsula to enjoy. In this regard, farmland crossed by official Rights of Way, permissive paths and other more informal paths are as vital to people's enjoyment of the outdoors as are the parks and country parks which, whilst welcome, provide limited walking within the Borough for the many residents and visitors who wish to undertake more extensive walks. We are extremely concerned and perplexed in respect of the proposals in the above review, particularly the removal of swathes of green belt land, which will clearly impact on footpaths and other tracks both formal and informal either crossing these areas or running adjacent to them. The Borough's suggestion that their proposals largely amount to infill development is completely false as they will lead to the joining up of several communities that currently have a distinct identity, for example Irby and Pensby. Elsewhere the release of significant acres of green belt land is proposed, for example around West Kirby, Caldy and Eastham that will destroy the semi-rural / village nature of these communities. We note the revised ONS figures forecasting a much reduced population for the Borough by 2035, in line with but still above the historic trend. A figure of some 488 units per annum is now required which equates to 7,320 units over the forthcoming 15 years. We know, as does the Council from Peel Holdings Limited that they are able to redevelop the derelict industrial heartland of the borough at Wirral Waters and plan to deliver some 6,450 units within the 15 year period.</p> <p>We are also aware that the Council has over 2,400 units identified on brown field sites (some at Wirral Waters) and also has between 4,000 and 6,000 empty properties that could be brought back into habitable use before the irreversible decision is taken to release unacceptably large blocks of green belt land. It is totally unacceptable, as per the planning guidance (NPPF) to destroy farmland when there are brown field sites and empty houses available as described above. The Borough's economic development plans rightly focus on the need to reinvigorate the town centres on the east side of the Borough that have suffered greatly from industrial decline. Surely the way forward is to focus on the development of the derelict brownfield sites within these towns with a range of units, but focussing on starter homes and apartments for the increasingly aging population in the Borough for which many of these brownfield sites are well suited. Much of the infrastructure and services are already in place, much of it underutilised. The development of units in these areas and the injection of new consumers will surely help with the rejuvenation of these towns and their many small businesses which is so sorely needed. In the future there is likely to be a surplus of large properties on the west side of Wirral as the increasingly aging population looks to downsize and move to be closer to services and amenities. The provision of apartments on brownfield sites together with the possible conversion of larger older properties to apartments will address the future population needs of the Borough; which the provision of new units on greenbelt sites that are remote from such facilities won't.</p> <p>We therefore call on Wirral Council to drop any proposals to release Green Belt for development as there is clearly sufficient brown field land and scope for refurbished housing to meet the "theoretical housing need". In addition, we call upon Wirral Council to reconfirm the existing Green Belt boundaries so that our residents and visitors can enjoy walking and similar activities in our precious open spaces with the undoubted improvements to health and wellbeing benefits these activities bring, thus preventing a drain on public funds in other ways. Increases in visitor numbers to also enjoy such activities, with the resulting increased spending they bring, would also be beneficial to local businesses and the Borough's funds.</p>
DOR00280	<p>I write to object to the reallocation of the Green Belt land for residential development on Seabank Road, Riverbank Road, Manners Lane and Wittering Lane, Lower Heswall. I object to any loss of Green Belt land, especially when this land is situated in the precious coastal belt. The land is also designated as high quality agricultural land and forms part of our leisure facility - the Wirral Way, which is a National Cycle route and popular walking route used by many thousands of people. Building on any of this land will detract from the open nature of this coastal belt/leisure facility. The housing, if allowed, will be inappropriate development - either executive housing which is not required or if social housing, placed well away from any amenities/public transport links. Any change in the SHLAA would lead to a detrimental change in the character and unspoilt nature of the area and would represent a dereliction in the duty of protection that has been given to you as planners and as a local authority. You must uphold principle of Green Belt and protect it for future generations. [Attached letter referring to a previous submission in September 2017, concerning Strategic Housing Land Availability Assessment]</p>
DOR00281	<p>I write to you to protest vigorously at the Council's proposals for Wirral's Green Belt generally and for the areas surrounding Barnston Village, Storeton and Thingwall in particular (Parcels SB061, SB062, SB063, SB064, SB065, SB065K, SB065L and SB065N of the Local Plan). Below I set out my case explaining why the Council should radically revise its planning proposals and prevent development on the Green Belt. Barnston Village has an old history. The Domesday Book records it as Bernestone. The available historic sources show that it was constructed in 1754 and was registered as an alehouse in the same year, later functioning as the village Post Office. The cartographic evidence however can be traced back to the tithe map of 1849 where the house is depicted much as it exists today. There would have been a settlement on the location for many centuries, raised as it is on a sandstone bank. Barn is thought to be one of the oldest barns on the Wirral. I mention this as the house, as other houses and farms in the area, contributes to the identity of Barnston as separate village. The character of Barnston is very much tied into the existing farms of the area, (Beech Farm, Bank Farm, Manor Farm and Carnsdale Farm), Barnston Church, the Fox and Hounds pub and the Barnston Dales Adventure Camp. Encroachment on the Green Belt would mean that Barnston would lose its identity. The ensuing loss of the farms would mean that the fields would devolve to housing estates or scrub and Barnston would no longer have any local working community. It would become another dormitory village. Demand and Supply Assessment Crucial to a credible Local Plan is a proper assessment of demand driven by realistic demographic assumptions and a proper and complete assessment of land supply. The Local Plan as it stands fails to convince that such an assessment has been properly undertaken and reviewed. This places the</p>

DOR REF	RESPONSE
	<p>whole Local Plan into doubt. Firstly, the demand side should be set out so that underlying growth assumptions can be challenged. The figures from the Office of National Statistics show a reduced rate of natural growth for the Wirral of 0.07% and net migration being close to zero. It is not clear how the Local Plan takes into account the latest statistics on the demand side. Secondly, options to use the Green Belt should only be entertained in extremis, that is, after all brown field sites and all sites granted planning permission have been identified and factored into the Plan. It seems that the only brown field sites that have been considered are those that would interest national construction companies, (i.e. those sites that are of a sufficient size to give national companies an adequate return to their shareholders). Also it is not clear that the potential of brown field sites to meet demand has been maximised through, for example, building upwards. Important in the demand/supply equation are the number of dwellings which Peel Group promised in return for development rights to land. It beggars belief that the contract did not specify a time limit for the construction of dwellings on pain of the withdrawal of planning consents or financial penalties. I have read about certain allegations of potential conflicts of interest arising from a relationship between a Council director and a senior director of Peel Group. I assume that such allegations have been properly investigated and reviewed by management and by the District Auditor, Grant Thornton. I would like confirmation that this is the case.</p> <p>Consultation process. Councils have a legal requirement to consult their residents for issues regarding planning and redevelopment, the environment, and in difficult matters that generally affect funding decisions ('Best Value Duty Statutory Guidance'). In addition, in Common Law, residents have a legitimate expectation of a fair process. At Bank House we have received two letters from the Council: A short letter dated 'August' 2018 from the Council Leader which mentions 'throughout August and September an extensive programme of community consultation', and a reference to a webpage giving maps of the sites affected. The other letter we received concerned plans for an infill proposal on Gills Lane.</p> <p>I have three objections to the Council's consultation process:</p> <ol style="list-style-type: none"> 1. The Council did not clearly set out the venues and times for the programme of community consultation. I only heard about a couple of events second hand through social media. Effective communication of the programme of community consultation was vital for a fair consultation process. This was not achieved. 2. Although we received a letter concerning infill proposals for Gills Lane, we did not receive a neighbourhood notification letter about a proposed infill development on Storeton Lane which would affect us more directly at Bank House. 3. The information on the Council's website is very difficult to read and navigate. The one document that could have brought together a clear, concise and accurate analysis of the situation and options (the 'Development Options Review' - Briefing session, September 2108) spectacularly fails to do this. It is littered with undefined acronyms and could only be understood by someone who was able to attend the briefing meeting and ask questions. Any consultation process should be proportionate to the issues at hand and be designed to facilitate scrutiny. The process that the Council has conducted falls far short of an open, transparent and engaging process capable of delivering a fair outcome. For such an important and far-reaching set of proposals I would have expected the consultation process to have been far more informative and engaging. I walk the fields behind Barnston Church daily and have been doing so for 17 years. The fields and pond provide an important resource for many species of mammal, birds, insects and plants. Voles and field mice and beetles support a number of raptors, including Merlins, Kestrels, Tawney Owls and the odd hunting Barn Owl and Little Owl. Brown hares, Partridge, Lapwing and Redshank feed in the fields. Of particular concern are the bats, which nationally are under pressure. Bats hunt under the trees in the cemetery and under the trees of my garden at Bank House. They are likely to be maternity roosting in the many out-barns in the farms and other buildings, (and possibly Barnston Church) within the Barnston area. The following bat species are known to be within the area: Noctules, Pipistrelles, Brown Long-Eared, Natterer and Leisler bats. These species of bat have recently been identified using DNA analysis at nearby Storeton. In addition it is possible that the pond behind Barnston Church could harbour Great Crested Newts. The pond does not dry out. It has bush and tree shade and has species of aquatic plant important in the lives of newts. It also has small fish and an abundance of insects and aquatic birds. The pond has characteristics that are typical in ponds that support great crested newts. The ecological concerns are not restricted to the fields, ditches and ponds of the affected areas but also the farm buildings and outhouses. Any significant curtailment to the farms would render the buildings economically unviable too. The consequential loss of nesting and shelter sites for swallows and martins and skylarks and the probable loss of maternity roosts for bats and owls would be very significant to the wild life diversity of the area. The demands of a significant number of new homes in the Green Belt around Barnston, Storeton and Thingwall will place huge demands on existing and often already inadequate infrastructure. The traffic bottlenecks on the Barnston Road (A551) through the 'Narrows' of Storeton Lane and the Cut at the Fox and Hounds are already problematic. Putting a further 1000 or so cars into the area at peak times will cause huge challenges and also create health and safety issues. Articulated vehicles were banned from this section of the A551 for this very reason. The fields on the west side of Barnston Road are liable to flooding, being glacial moraine clay deposits. The floods in the winters run across Barnston Road to the houses on the Eastern side. Building on this land is likely to exacerbate this problem. The local schools have limited capacity to serve a significant increase in local children. Local transportation links (school buses for example) contribute to the traffic congestion at peak times on local narrow roads. The additional projected road use will impact adversely on pollution levels and on litter. The pavements on Barnston Road up to the Village are not maintained by the Council, due to cuts. They are overgrown and difficult to walk along. <p>New houses in the fields will add pressure on the Council to maintain the pavements and the right of way across the fields. I have seen very little acknowledgement of these issues in the Local Plan. Barnston and the surrounding villages situated in the Green Belt provide a priceless respite from encroaching urbanisation. Many people in nearby ribbon development areas visit the villages for walking, nature watching and horse riding. The Local Plan is deficient in that it does not use a proper realistic or up-to-date assessment of demand for homes nor does it maximise the use of all brown field sites. It is deficient in that the consultation process was not fit for purpose. It is deficient in that there is no ecological impact assessment or a proper assessment of the local infrastructure requirements. For the benefit of all future generations who will reside in our unique Wirral Peninsula, it is your responsibility to address this correctly.</p>

DOR REF	RESPONSE
DOR00282	I am writing to voice my objections to any more land being used for development – housing or otherwise in the Saughall Massie and peripheral area. Saughall Massie is of Anglo Saxon or earlier origin and reference is given to it in the Domesday Book. It was given conservation area status in 1974. Over the years, Saughall Massie has gone from being an area of attractive fields and farmland to becoming almost one large housing estate. In 2000 our pretty country lanes were replaced with a by-pass which sees approximately 27,000 vehicles travelling along it each day. This year we had to endure the reality of the “industrialisation” of a large piece of greenbelt to accommodate a fire station. I recently read that Wirral currently has 4,600 empty properties and a population which is decreasing. The ONS has also provided a new-post Brexit low economic migration scenario for the UK. There are also 2,400 brownfield slots which have been identified by the Council, a 2,900 minimum offer from Peel; 3,570 houses over 5 years and in total 8,870 non Green Belt house places. If the council own many hectares of unused brownfield land, why not develop this to make new “Green Villages?” Wirral could lead the initiative nationally and gain a reputation for revitalising run down areas of land whilst preserving our life enhancing and vital oxygen producing green spaces.
DOR00283	Same as DOR00198
DOR00284	I am writing to object wholeheartedly to the prospect of a large developer who has paid for the option to buy the field north of Diamond Farm. The farmer uses this field to graze his cattle and without it, the farmer would not be able to continue running the farm. Diamond Farm is in the Conservation Area of Saughall Massie village. Saughall Massie's long standing heritage has been in farming and Diamond Farm has been a working farm since 1911. This is a perfectly functional and productive farm with cattle being raised for beef. The present farmer's father before him nurtured dairy herds for many years before retiring. On retirement other farm workers employed there, took over management of the farm. The present farmer and all his workers, who have worked on this farm for years, and wish to remain, would all be put at risk of losing their livelihoods if this purchase went ahead and, no doubt, these men will have families who depend on their income. If this farm was uninhabited or derelict, then there might be a case for a wealthy land owner seizing it to add to his national house building portfolio. However, I believe for this to happen, under these circumstances, would be morally wrong. From my knowledge, wealthy land barons and house building companies own land for building on across the length and breadth of the country. They have secured land for this purpose in Saughall Massie before now - so much so - that what was once fields of agricultural land, as far as the eye could see, is now a series of housing estates and developments with small areas of green belt or green space sandwiched in between. To take away this working farm and replace it with yet more housing would totally alter the essence of this historic, agricultural, 'semi-rural' Conservation Area. This is because Diamond Farm and the visual aspect of its cattle grazing on the pasture land is the most important feature which characterises this village. Referring to Saughall Massie's Conservation Area and Appraisal/ Management Plan, in section 3.4.2 it states "agricultural land and related features are seen throughout the Conservation Area and are important in distinguishing Saughall Massie from the many suburbanised historic villages in Wirral". [Further information quoted/provided] From reading selected areas from all of these documents I have been able to establish that Diamond Farm, its barn and a farm building behind this, are all listed buildings which lie within the Conservation Area. The pasture land to the immediate left of the farmhouse on Saughall Massie road is likely to be greenbelt. This boundary line can be seen on the Conservation Area map. The pastureland where the farmer grazes his cows / heifers at the rear of the farm buildings falls within the Conservation Area. Finally, the point I would again like to make is that Diamond Farm, its cows grazing on the land around and about us as we pass taking a stroll, is the most predominating feature of Saughall Massie village's Conservation Area. This single trait reinforces the idyllic, tranquil, historic and semi-rural character of the village. It literally forms a large part of this hamlet's life and soul to its residents and visitors passing through. To strip all of this away would be equivalent to removing the soul from the heart of this historic village.
DOR00285	<p>I am extremely concerned and object to any Greenbelt being released for development. I understand that I am one among thousands of people in Wirral who are objecting to these plans. I don't have access to the internet, so I have had to go to my local library to find out the information regarding this matter The Local Plan consultation states you are planning to build 12000 homes. Currently there are approximately 140000 households in Wirral with a population of 320000, giving an average of 2.3 people per household. Despite this being a rough calculation, 12000 houses would need a population increase in the region of 27000 people. Again roughly a 8.5% increase in population. Wirral Council's own figures do not support this increase in population. The Wirral Compendium of Statistics 2018 Table 1i provides projections of population by Age MID - 2018 TO MID - 2038 2018 = 322.8 (thousand) 2023 = 325.2 2028 = 326.9 2033 = 327.8 2038 = 328.3 This is a Wirral Council Document and it gives an estimated increase of 5.5 thousand residents on Wirral, over a 20 year period 2018 and 2038, an increase of 1.7%. This would be proportionate with the population trend of Wirral over the last few decades. I understand that the Office of National Statistics has also released a projection which would be in line with and supports the population trend on Wirral. Simply 12000 houses are not needed on Wirral. I understand that there are in the region of 4600 - 6000 empty homes on Wirral which are being brought back into use. This is clearly the way forward and I would expect that within a local authority who states that housing a priority that bringing these homes back into use should be one of the main priorities for the Council.</p> <p>Why build more houses when there are already plenty on homes on Wirral, which with some investment and support can be regenerated and provide a positive contribution to the housing requirements. Failure to increase this area of work will leave communities neglected and run down. I believe that one of the main issues in this consultation is how the Local Plan will benefit the local Community, but how the Council can make it attractive to big developers, i.e. what will be most profitable for them. I understand that during a public meeting on 10 September, [council officer] described sites with less than 50 units as being 'challenging'. As in it was difficult to get developers interested as there wasn't as much profit in them. Ideally they wanted sites of 100 units plus. This was also the stance with brown field sites. It costs too much to prepare these sites which reduce the profitability for the developers. The Greenbelt should not be released for developers to carve up to maximise their profits. The voices of the Wirral people for whom the Council serves should have far more weight and should be listened to first and foremost.</p> <p>I'm sure the developers will put forward that they need to have some premium land to build on to help with their cashflow, which will then be used to build affordable housing schemes. I understand</p>

DOR REF	RESPONSE
	<p>that this is actually a national scandal in that 80% of these 'affordable housing' schemes are never built due to a loophole which allows developers to get out of their commitments. Well this is a complete travesty and should not be allowed to happen on Wirral. Let's work for what's best for Wirral people not Housing Developers who simply are only interested in the profit margins. There are many areas in Wirral which are desperate for money to be invested for regeneration, Birkenhead and New Ferry as prime examples. I understand that brown field sites, could hold up to 18000 homes. Again this must be a priority for the Council and would have immediate positive impacts on the communities in and around these areas. It is illogical to build more homes and invest in new communities while neglecting existing communities. To do this would lead me to believe that something is amiss, and that the Council are not concerned with helping the people and areas most in need. Some would call that social cleansing. There are many areas in Wirral which are desperate for money to be invested for regeneration, Birkenhead and New Ferry as prime examples. I understand that brown field sites, could hold up to 18000 homes. Again this must be a priority for the Council and would have immediate positive impacts on the communities in and around these areas. It is illogical to build more homes and invest in new communities while neglecting existing communities. To do this would lead me to believe that something is amiss, and that the Council are not concerned with helping the people and areas most in need. Some would call that social cleansing. There are many areas in Wirral which are desperate for money to be invested for regeneration, Birkenhead and New Ferry as prime examples. I understand that brown field sites, could hold up to 18000 homes. Again this must be a priority for the Council and would have immediate positive impacts on the communities in and around these areas. It is illogical to build more homes and invest in new communities while neglecting existing communities. To do this would lead me to believe that something is amiss, and that the Council are not concerned with helping the people and areas most in need. Some would call that social cleansing Peel Holdings/Wirral Waters have enough land to fulfil the housing needs, over a similar period of time which the Local Plan is due to run. This should be fully supported by the Council and this work should become a priority, instead of digging up green fields and grasslands, the docks and the surrounding areas could become a hub for the community and breath much needed life into the Birkenhead and Wallasey area. I have other major concerns about reducing the greenbelt on Wirral. The greenbelt is the lungs of Wirral, especially with the industry in the area running from Birkenhead to Eastham. Reducing the greenbelt and building on areas like Vineyard Farm and Claremont Farm, would only result in increased traffic and population, in areas which are already extremely congested. Loss of greenbelt also risks increased flooding, at a time when weather is becoming more uncertain, the greenbelt is a natural sponge.</p> <p>This is particularly prominent as the Intergovernmental Panel on Climate Change has recently released a their study which has a significant warning about the impact of climate change. Furthermore this also links in with losing Greenbelt which is farming land. Again with the imminent departure of the UK from Europe, food supplies will become more uncertain and it seems ludicrous to destroy prime farming land, which contributes so much in these uncertain times of climate change and food supplies. I am completely against the plan to release ANY Greenbelt for development. I believe its short sighted and it is bowing to the pressure of housing developers instead of listening to the people of Wirral, who the Council is there to serve. The housing targets are clearly wrong. There are between 4600 and 6000 empty homes that can be brought back into use. There are potentially 13000 homes to be built by Peel Holdings and there are other Brownfield sites which can be regenerated for housing. As such to build on the greenbelt would be a tragedy for what makes Wirral so special.</p>
DOR00286	Same as DOR00198
DOR00287	<p>I write to object in principle to the release of Green Belt land for development contrary to national policy, strengthened under planning reforms announced 5/3/2018, and local policy, recently reiterated by the Councillor Leader in February 2018. I also wish to comment on specific information provided (or not!) by the Council in its planning policy documents and at the September public meetings which were necessarily broad brush. When questioned these lacked definite answers to pertinent points. Even allowing 12,000 homes over 15 years as necessary - but unexplained - there were no details of brown field land nor the empty housing stock available for bringing back into use and offset against the total. There was an admission that more Green Belt land than necessary for required development will be released - Why?! That situation will invariably encourage developers to 'cherry pick'. For example, prime areas will be chosen for the favoured executive properties (apparently 78% of houses built on Green Belt are not affordable). The usual trade-off between developers and Council will presumably remove promised affordable homes from final planning permission. What provision is factored in for social and economic infrastructure? At what point in the process, between planning permission and Council Tax receipt, can housing units be counted? Why can the Wirral Waters housing/industrial development not be accelerated...and counted? Sanctions should be available against any developer, in this instance Peel Holdings, failing to proceed expeditiously with development. The unexplained requirement for industry apparently fails to recognise farming as an industry. Knowing my own area best, I can state that the farm land on either side of Rivacre Road, Eastham, and between Mill Park estate, the A41 and the M53 produces significant annual crops which, I suggest, will be more important in future than any extension of, for example, petro- chemical plants. The proliferation of 'To Let' signs along the A41 from Eastham to Birkenhead indicates that light industrial units and office spaces are already surplus to requirements. The maps supplied in support of current threats to Wirral Green Belt indicate that everywhere east of the M53 is available for 'urban sprawl'. Distinct elements will merge into an amorphous mass with the loss of essential countryside, historic communities and conservation areas. I appeal for preservation of the Green Belt and the use of alternative provision for development</p>
DOR00288	Development on Green Belt land is totally against current Planning Policy It's disgraceful that Labour Council plans to sell off and build on Green Belt Land when there is space for 1800 home on brownfield sites on the Wirral [Objection is to the proposed Hoylake Golf Resort which was not included as part of the Development Option Review]

DOR REF	RESPONSE
DOR00289	<p>We wish to lodge our strong opposition to the consideration of the development of Green Belt land. Green Belt land is of great importance to the community on the Wirral, encouraging tourism, recreational activities, preserving wildlife and the rural environment. Encroachment into this area cannot be justified. We wish you to consider the following points: While appreciating the National Government's identification for new homes, Wirral Council's plan must be relevant locally. The population of Wirral is set to decrease over the next 10-15 years and there is little prospect of inward migration, hence the need for 22% of the Green Belt land to be identified for development cannot be justified. It should be noted that development of Green Belt land should only be in 'exceptional circumstances'. Green belt land is protected to prevent unrestricted growth of urban areas and maintain openness. In fact, National Planning policies attach great importance to the preservation of Green Belt land and building would be inappropriate. Several large properties in Heswall have recently been demolished and replaced with apartment blocks allowing multiple occupancy. We do not believe this has been taken into consideration in the Wirral Local Plan. We wish to now address the land on the west coast of the Wirral. According to the Wirral Local Plan the area between the Wirral Circular Trail and the Dee River is under consideration for 'infill villages'. Surely, Wirral Council cannot support this proposal with regard to infrastructure alone. The current roads are inadequate, being too narrow and currently congested. The junction at the top of Parkwest, The Wirral Circular Trail, Wittering Lane and Farr Hall Drive is already a hazard for pedestrians, cyclists, horse riders and cars and any further increase in traffic would be dangerous. Equally the junction of Delavor Road and Wittering Lane is perilous, being on a sharp bend just after a bridge. The current provision for drainage and sewerage is only barely adequate now and any increase in usage would overstretch these services. Properties in Parkwest have already been subject to household flooding, which took some considerable time to resolve by the Water Company involved. The current provision of schools and public transport is wholly inadequate for any increase in the local population. Notwithstanding these practical issues, the Green belt land along the Dee Estuary is an exceptional environment with incomparable views across the Estuary to North Wales. The introduction of 'infill villages' in this region of Green Belt land is totally out of keeping with the conservation of the rural nature of the area and is to be resisted. The habitat along the coast of the Dee River and is an area of international importance for migrating birds and wildlife, such as badgers, bats, owls. Any destruction of this environment would be injurious to these species and must be repelled by Wirral Council, who have always prided themselves on protection of wildlife and conservation. Once developed this area would impact on those using the Wirral Circular Path and the footpaths surrounding, destroying the outlook across to North Wales. In summary, violation of the Green Belt Land should not be tolerated on grounds of superfluous inadequate infrastructure and destruction of internationally recognised habitats and preservation of the environment.</p>
DOR00290	<p>It is not clear within the current consultation as to the policy approach to be adopted by Wirral MBC in terms of the safeguarding and strengthening of these fixed infrastructure assets. Within the Wirral Unitary Development Plan (February 2000) both the Port of Liverpool (Birkenhead Dock Estate) and The Manchester Ship Canal (Eastham Dock Estate) were specifically notated with Policy EM10 providing the requisite policy support. This approach was also to be followed within the Core Strategy for Wirral - Proposed Submission Draft (December 2012). In terms of the emerging Wirral Local Plan, we would respectfully request an identical approach to that previously adopted by Wirral MBC in terms of the designation of the operational port estates and the inclusion of a specific ports policy. This would also be consistent with the policy approach taken towards port infrastructure within both Sefton and Liverpool Councils, for example: ELPS 006 Land at Queen Elizabeth Dock, Manchester Ship Canal. We note the intention to allocate this site for 81, 82 and 88 development. The land is "operational" port land which benefits from permitted development rights for port related activity. Given the long established petrochemical/bulk liquids cluster this land should be safeguarded for port dependent projects rather than forming part of a wider employment land allocation. ELPS 030 Land at Tower Wharf, Twelve Quays. We note the intention to allocate this site for 81, 82 and 88 development. The land is physically contiguous with the Twelve Quays ro-ro terminal and whilst the site could be utilised for wider business use it could be easily assimilated as "operational" port land. We have recently secured planning and marine approvals for a multi-million pound programme of infrastructure works at Twelve Quays to facilitate new freight vessels to be deployed on the Birkenhead - Belfast route by Stena Line. ELPS 031 Land at Morpeth Wharf, Twelve Quays. As per ELPS 030 above. ELPS 081 Former RHM Mill & Canada Creek, Birkenhead. The site (excluding the existing Graving Dock) was included within the Mersey Ports Master Plan to provide the potential to decant and safeguard existing port activity from the East Float to West Float in order to facilitate the wider Wirral Waters regeneration plan. It should also be noted that the current red edged plan ought to exclude the Graving Dock from employment land calculations as this is an existing specialist shipbuilding/repair facility linked to Cammell Laird. ELPS 357 Former Mobil Oil, Birkenhead. The site was included within the Mersey Ports Master Plan to provide the potential to decant and safeguard existing port activity from the East Float to West Float in order to facilitate the wider Wirral Waters regeneration plan. ELPS 415 Former Eastham Sand, Wirral International Business Park. We note the intention to allocate this site for B1, B2 and B8 development. The land has an extant planning permission for the handling and processing of marine related sands and aggregates. In terms of alternative business uses we have previously been in dialogue with Wirral MBC over the challenging viability issues for such a redevelopment. We have therefore suggested this brownfield/windfall site could form part of a wider regeneration masterplan overlooking the River Mersey for residential purposes. In terms of Green Belt Review sites of relevance to our operational port estates we would comment as follows: SP055 East of Ferry Road, Eastham. The land forming part of the review to the immediate north of the access road to QEII Dock is owned by The Manchester Ship Canal Company. We would like to better understand the aspirations of Wirral MBC in terms of the redevelopment of this site presumably for residential purposes.</p>

DOR REF	RESPONSE
DOR00291	<p>1. In February 2018 the Leader of the Council stated: “I am not prepared to allow our green belt land to be built on. I am resolute about that commitment. It is the jewel in Wirral's crown and greatly valued by our residents. I urge him to uphold this promise. 2. Frankby Green Belt Land and Conservation Area. I live within the conservation area and I am appalled at the amount of development that the council have approved over the last 5 years, both within the conservation area and on the green belt farmland just outside the conservation area. This development of both sites has been permitted despite the many objections by the residents. *Frankby is a very small area, thus any further' development of green belt farmland or subsequent development of land within the conservation area, would be detrimental and indeed would greatly change this small unique and attractive hamlet permanently.3. I believe the green belt land on the Wirral should be protected, not only for the enjoyment of the open spaces for the present residents, but also for future generations. • Why has Peel Holdings proposed development at Wirral Waters been allowed to drag on for so long, without any sign of progress?. Surely there must have been some form of contract or understanding between the Council and Peel Holdings? I understand the current proposal by Peel Holdings is to build only 2,400 houses in the next 15 years, instead of 13,000 houses originally agreed. Why has this been allowed to happen?I assume that, however many houses are eventually erected at the Wirral Water site, these will be included in the overall quota. • Why do the Council not bring into use the many empty properties on the Wirral, which I understand are many thousands. • I believe there are more than enough brown field sites available for development to meet realistic targets, without releasing green belt land. • Why are the Council prepared to borrow a large amount of money to land developers, in order to build luxury houses and a golf course on green belt land at Hoylake, but do not seem inclined to do the same to develop land on brown field sites? I believe that Wirral needs affordable houses, not luxury ones. Incidentally, I understand there has been considerable opposition to this proposal also. • Other local developments have been the Fire Station at Saughall Massie, which again is being built on green belt farm land. Surely this development could have been constructed on brownfield land. Here again, there was massive opposition to this development, to no avail. I understand that further green belt farm land within the area of the fire station has been earmarked as a proposed site for development. Obviously, once one piece of land has been released for building, this subsequently opens the flood gates for further development in the area. • I firmly believe that if the Council continues to release green belt land for development, they will virtually obliterate the ancient character of villages such as Frankby, Storeton, Barnston and Eastham, to name a few. Once green belt land is developed, it is lost forever as green spaces, which is sad especially for future</p>
DOR00292	<p>I am fairly recent resident of the Wirral, having moved to Heswall from the South of England just eleven years ago. I have found the area delightful, coast countryside and two cities within easy reach. There are lovely walks within minutes of my front door! From the information that the Council records show, so many developers and land agents wish to build thousands of homes on green belt land. If this is allowed, Wirral will be changed for the worse in a very short time. With new houses, new roads, cars, schools etc. will be necessary. Unfortunately Wirral has already planned to engage in plans to build an elite golf resort in Hoylake with its attendant executive houses. I remember aggressive driving in the S. E. which occurs when too many drivers are struggling to get to their destination when the roads are overcrowded. Do we want this to happen on the Wirral? I can't stress too firmly that I strongly object to the ruination of the Wirral by using green belt land for unnecessary building and support the local societies who are working so hard to ensure that all Wirral residents can enjoy our beautiful green belt for many years.</p>
DOR00293	<p>I strongly object to the development of green belt land. I attended a public meeting at Pensby School so that I could learn more about the facts. I remember Irby increased by 25% not so long ago, so to add more housing is in my opinion not a good idea. We already have lots of housing which need renovations 4,000 - 6,000 vacant properties. Peel Holding has lots of Brown Belt land which would accommodate housing to be built on. The council are very slow at renovating vacant properties. It's no use building high end houses on Green Belt, most people could not afford the prices. I do not agree to being joined up with Thingwall and Pensby- Irby is a separate Village and I would like it to stay that way.</p>
DOR00294	<p>Although you pointed to some interesting documents surrounding the workings and inception of the Local Plan, You were unable to help in my rather particular request and the assumption I had to make was because no such evidence existed. If I'm honest, since then I've been highly critical of the apparent disregard the council seem to have for the worth of this piece of land to the many thousands that use it. The news of its inclusion sent shockwaves throughout the community, for this is no 'spare bit of land' to those who live in the area, an area with a population of some 40 000+, a high proportion of whom will have used the carpark at some time in their lives - many, every day. I admit that I am unsure which section, department or committee in the council is responsible for suggesting the carpark be included - but I've chosen what appears to be the department designated to receive the 'mumblings and grumblings' of the boroughs good citizens to aim our attention. However, I'm presenting not so much of a grumble but a document that tries to do, what I believe is, the sort of investigation, simplistic and naive though it may be, that the council should have done before considering including the carpark in the plan. As part of our 'deposition', in order to show the level of shock, disbelief and distress its inclusion has brought to the community, I've also included the totally uncensored and randomly chosen comments of some of the 4000+ signees of our online petition. We have worked hard on behalf of our traders and community and would ask that the full content of the report be given serious thought and consideration. [Further information/evidence attached to support argument]</p>
DOR00295	<p>Enclosed is the response to the development options consultation, with particular reference to the Green Belt review, and research into the impact on the Barnston/Thingwall area should Green Belt Parcels SB061, SB062, SB063, SB064, SBOGS, SBOGSK, SBOGSL and SBOGSN identified within the emerging Local Plan, be released from the Greenbelt, as proposed by Wirral Borough Council. On 5 September 2018, Barnston Conservation Society submitted a Freedom of Information request to the Corporate Director for Economic and Housing Growth, requesting information on the Environmental impact on the area should the identified parcels be released from the Greenbelt. The reply came from the Senior Planning Consultant stating that no impact assessment had been made. The accompanying report, therefore, considers the environmental effects of releasing the identified parcels and the content enclosed should be used as a reference by Wirral Borough Council to satisfy the policies within the National Planning Policy Framework.</p> <p>I wish to pass on my serious concerns with reference to the Development Options Consultation</p>

DOR REF	RESPONSE
	<ul style="list-style-type: none"> • The overwhelming concern expressed by many that Wirral Borough Council is even considering an alteration to the Green Belt boundary. • Frustration by many that the information given by Wirral Borough Council on the website is confusing, poorly set out, and not fully informed. • Disbelief that Local Councillors were unable to answer questions from the public during Public Meetings. • Despair that Wirral Borough Council has been unable to provide the Consultation with reliable, proven figures, for Economic Growth on Wirral and thus a correct projection for new homes <p>My conclusion is that the Development Option Consultation is based upon premises which are fundamentally flawed. The factual evidence in the enclosed document is irrefutable. It presents an overwhelming case for the Council to re-think its proposals for this area. Given the much-reduced figures for housing needs, to consider the decimation of Wirral's Green Belt whilst, at the same time neglecting the much-needed development of Brownfield Sites in North Wirral, beggars belief. The Council's whole approach to the Local Plan needs re-visiting and revision. I disagree that there is any need for Wirral Council to consider the redesignation of ANY green belt land for development purposes. This is based upon the view that incorrect data and methodology has been used to establish the shortfall in the housing pipeline, specifically:</p> <ul style="list-style-type: none"> • The use of wholly incorrect 'baseline' figures. The recently published ONS figures for population growth dramatically reduces the volume of properties required in Wirral • The misinterpretation of the 'buffer' referred to in the NPPF2 - this buffer is clearly part of the required number NOT additional to and does not increase the baseline number- it simply alters the timing of the delivery of properties. <p>The disagreement with the headline figures also relates to the understatement of the figures relating to the number of properties available from the redevelopment of brownfield sites and the understatement of the figures relating previously empty properties brought back into use during the local plan period and the understatement of 'windfall' sites.</p> <p>Specific Comments SP 062 - Green Belt Land West of Barnston bounded by Barnston Road, Gills Lane, Whitfield Road, Downham Road North, Napps Way, Pensby Road, Belmont Drive, Fender Drive and Marfield Lane. The following comments clearly prove that the development of SP062 is far more harmful than the development of almost all other sites identified for further investigation. SP062 continues to serve each of these purposes as follows and there are many sites contained on the 'List of sites recommended for further investigation' that serve these purposes to a significantly lesser degree. Unpalatable as it is for any green belt parcels to be developed there are many sites on which development would be significantly less damaging and which are therefore more appropriate for development than SP062. I make the following comments: Along with 19 other sites recommended for further investigation, SP062 is described as partially enclosed whilst 4 sites - with a combined potential for 1,099 to 1,649 properties - are 'highly enclosed' and are therefore more suitable for development than SP062. Indeed, when one looks at each of the 5 SHLAA sites that compose SP062 they have a low proportion (%) of land adjacent to urban areas and are either individually: 'Poorly enclosed' - SHLAA884 (25%) and SHLAA1956 (42%); 'Not Enclosed' - SHLAA 1881(10%) or 'Rural' - SHLAA 1955 (0%). There are 12 sites - with a capacity for up to 1,989 properties - that the council determine identify in Appendix 3 as not serving the purpose of preventing urban sprawl and would therefore be more suitable for development than SP062. The council has adopted the methodology of to assess SPs against this purpose of considering whether the development of a green belt site would join up 'Core Strategy Settlement Areas'. I would argue strongly that this is a very arbitrary and wholly unrealistic manner in which to assess whether neighbouring towns will merge into one another. There is little chance of any 'Core Strategy Settlement Areas' merging into each other and protection against this was never the intended purpose behind the designation of Wirral's green belt areas in 1983 - partly because the definition of 'Core Strategy Settlement Areas' didn't occur until 2016. The true purpose of SP062 in relation to this factor is to prevent the merging of the very distinct towns/villages of Pensby, Heswall and Barnston. The development of SP062 will have the highest level of impact - not the 'lowest impact' which it is currently erroneously assigned to SP062. Despite accurately noting in appendix 6 that the development of SP062 would both reduce and remove the physical separation between the towns of Heswall, Pensby, Thingwall and Barnston, the council then assess SP062 in appendix 3 not serving purpose 2 and acting as preventing the merging of neighbouring towns. This is an error which needs rectifying. However, even accepting the council's (erroneous) criteria for assessing purpose 2, and (erroneous) classification of SP062 as not serving the purpose of preventing the merger of neighbouring towns there are 28 other sites within this category. However, unlike 14 sites in this category- which do not border conservation areas-, SP062 borders on and would impact upon a designated conservation area - Barnston Village. The 14 sites which do not prevent the merger of core settlement areas and would impact not upon designated conservation areas have a combined capacity of 2,048 to 3,073 properties. These sites would therefore be more suitable for development than SP062. Of the sites recommended for further investigation, 17 strategic parcels - with combined capacity for 1,041 to 1,563 properties - have NO 'Best and most versatile agricultural land' and would therefore be more suitable for development than SP062. In addition to the 17 sites with NO BMV, there are a further 34 sites which contain a lesser area of BMV - with combined capacity for 6,726 to 10,092 properties- and would therefore be more suitable for development than SP062. However, SP062 is unusual as it is the only SP about which the council have commented in the 'Summary of Initial Green Belt Assessment' that it is only developable if another neighbouring parcel, SP061 is also developed. Therefore any development of SP062 would also see the de facto development of SP061 and the loss of the 21.32 HAs of BMV at that location. Therefore the combined loss of BMV in the development of SP062 (and SP061) would be 91.3 HAs - over 20 HAs more than the next site with the greatest concentration of BMV.</p> <p>ALL other sites for further investigation site with combined capacity for 7,767 to 11,655 properties have lesser area of/NO area of BMV than the combined SP061/062 and would therefore be more suitable for development than SP062. The development of SP062 would permanently alter the special character of the designated conservation area of Barnston Village whilst ironically the council has defined the 'landscape strategy for the area containing SP062 and Barnston Village as 'Enhance'. Despite accurately noting in appendix 6 that the development of SP062 would both reduce and remove the physical separation between the towns of Heswall, Pensby, Thingwall and Barnston, the council then assess SP062 in appendix 3 not serving purpose 2 and acting as preventing the</p>

DOR REF	RESPONSE
	<p>merging of neighbouring towns. This is an error which needs rectifying. However, even accepting the council's (erroneous) criteria for assessing purpose 2, and (erroneous) classification of SP062 as not serving the purpose of preventing the merger of neighbouring towns there are 28 other sites within this category. However, unlike 14 sites in this category which do not border conservation areas-, SP062 borders on and would impact upon a designated conservation area - Barnston Village. The 14 sites which do not prevent the merger of core settlement areas and would impact not upon designated conservation areas have a combined capacity of 2,048 to 3,073 properties. These sites would therefore be more suitable for development than SP062. Not only does SP062 play a role in encouraging the development of brownfield and urban areas but it is a great distance from the areas of greatest need shown on the map at Appendix 19 and therefore development on SP062 would have the least impact on the recycling of derelict land and other urban land. An analysis of the 'Sites for Further Investigation' and the 'Areas of Greatest Need' shows that SP062 is probably the site considered for further investigation which is furthest from an area of greatest need and almost every other site is nearer. It is wholly inappropriate and erroneous to consider developing the highest number of properties (up to 1,800 on SP062 alone and up to 2,153 if combined with SP061) in the area which is furthest away from where the council has determined the need to be. Furthermore the nature of the properties that will inevitably be developed in SP062 are completely the wrong type of property. Developers will build 3 and 4 bedroom executive properties on SP062. The 52 sites which are (often substantially) closer to areas of greatest need have a combined capacity of 7,944 to 11,926 properties.</p> <p>These sites would therefore be more suitable for development than SP062. SHLAA 884 SP062 is assessed to have a boundary strength of 75% (three quarters) which is NOT over three quarters. SHLAA 884 SP062 needs to be reclassified as 'moderate'. Furthermore, of the SPs and SHLAAs which contain a flood zone, there are 5 sites with capacity for 67 to 102 properties which contain a lesser area of flood zone than SP062 and which are therefore more suitable for development than SP062. There are 13 SP/SHLAA sites - with capacity for between 828 and 1,249 properties - which are not classified as a LCR Core Biodiversity Area and which are therefore more suitable for development than SP062. Furthermore, of the SPs and SHLAAs which are classified as LCR Core Biodiversity Areas, there are 28 sites with capacity for 3,511 to 5,270 properties which contain a lesser biodiversity area than SP062 and which are therefore more suitable for development than SP062. There are 25 SP sites - with capacity for between 3,038 and 4,561 properties - which do not include public rights of way and are therefore more suitable for development than SP062. There are 49 SP/SHLAA sites for further investigation- with capacity for between 6,797 and 10,205 properties - which do not include a river corridor and are therefore more suitable for development than SP062.</p>
DOR00296	<p>We object to the release of SP001 because in Wirral's UDP, Policy CH2- Development affecting Conservation Areas - the Council states that important considerations are: i) the visual and operational impact of the proposals on the distinctive characteristics of the Area, including the impact on important views into and out of the designated Area; ii) the preservation of the general design and layout of the Area including the relationship between its buildings, structures, trees and characteristic open spaces. We contend that the release of this field would significantly impact upon the views into and out of the designated area of Saughall Massie. In addition, Wirral Council's Saughall Massie CA Appraisal document states that "...The open fields around the village form an attractive setting for the conservation area and are critical to its continued agricultural use and character. The agricultural land outside the conservation area is also critical to its setting and visual character. The historic village has retained a degree of separation from neighbouring suburban settlements and is unusual within the context of Wirral for having retained both agricultural use and rural character." We contend that the release of Parcel SP001 would encourage "unrestricted sprawl" and result in a very large built up area, adjacent to the Conservation Area. The site also performs Green Belt purpose, particularly limiting urban sprawl and countryside encroachment. There is no objection to the release of Parcels SP002A & B which include the site of the now derelict Garden Hey Nursery. Reasons for objecting to the release of SP002C: Barnacre Lane. This field currently provides a significant buffer zone to the east of the Saughall Massie Village Conservation Area, preserving the agricultural character of the village. This proposed parcel of land abuts onto the Conservation Area boundary on two sides leaving no buffer zone between any proposed development, the buildings in Garden Hey Road and the Conservation Area. We object to the release of this parcel because it goes against Wirral's own Core Strategy objectives Policy CH17. For Saughall Massie, the principal planning objectives for the area will be to: i) preserve the rural setting, scale and character of the old village core; ii) preserve a compact settlement form which is separate and distinct from the modern, built-up areas nearby; and iii) retain unifying features such as stone walls, narrow lanes enclosed by mature hedgerows. Saughall Massie Village CA was designated in January 1974. It contains a small agricultural settlement as well as some of the surrounding fields which continue to provide an appropriate rural setting for the village. Site SP002C provides Green Belt purpose, keeping land permanently open and has value for residential amenity. We therefore contend that the release of Parcel SP002C would go against all these reasons for designating Saughall Massie as a Conservation Area and cause significant damage to the integrity of the village's agricultural identity. SP004A and B: (North of Saughall Massie Village (east of Saughall Road), North of Diamond Farm between Arrowe Brook and Saughall Road (to immediate north of Saughall Massie Conservation Area). This large field abuts Diamond Farm which contains the Grade II listed farmhouse and barns. Diamond Farm is a fully operational farming enterprise. The Best and Most Versatile Agricultural land is 88.7%. In the Council's own assessment, they say "Further development which disrupts the flat nature of the landscape could be detrimental to landscape character.... but could have an impact on the setting of Saughall Massie Conservation Area, further enclosing it from the north ..."</p> <p>By releasing this parcel for development, the rural character of the village would be lost and the "distinguishing features" mentioned by infill in the Conservation Area appraisal would be destroyed. By releasing SP005 - we contend that the sprawl of adjacent Moreton would be significantly encroaching upon the Conservation Area and the historic village of Saughall Massie, thus going against the Council's own aims in their Review. This site also benefits from Green Belt purpose, keeping land permanently open and settlements distinct. It also has a predominance of Best and Most Versatile land as 66% is considered high grade farming. It is our contention that this land should be protected for future generations. The loss of the field, SP005A would also impact significantly upon the farm business which has been built up over many generations. If they were unable to access the field to store their farm equipment, it would render them unable to function as a farm business within the</p>

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	<p>village. Reason for Objecting to the release of SP005 is that further development which disrupts the flat nature of the landscape could be detrimental to landscape character. Additional reasons why these parcels of land should not be taken out of the green belt and released for housing. Purpose 2: It would also act against Purpose 2 of the Council's Strategic Housing LA Study which is to prevent "merge": 9.19 The impact on separation of rural villages and other existing developed areas. Purpose 3: The development of Parcels SP001, SP002C, SP004A & B and SP005A would also be against Purpose 3 which is to "assist in safeguarding the countryside from encroachment". We contend that releasing Parcels SP001/002/004 /005 would go against the Council's Policy 13.1: The essential characteristics of Green Belt are their "openness" and their "permanence". [Reference is made to a previous appeal decision at the former Garden Hey Nurseries site, Garden Hey Road, Saughall Massie. This is to illustrate points raised in relation to impact on openness] Releasing Parcel SP001, the land running down from Greasby to the Saughall Massie bypass and across to Pump Lane would cause the two settlements to merge into one with the potential then for the Conservation Area to be swallowed up in the urban sprawl of Upton, Greasby, Moreton and then the urban area around Saughall Massie. Releasing Parcels SP004 and SP005 would have a similar impact by merging the Conservation Area village of Saughall Massie with Moreton, thus going against the Council's Core Strategy. Saughall Massie is in Settlement Area 8 Rural. The key issues include: i) Maintaining the Green Belt ii) Accommodating the economic restructuring of agriculture. iii) Maintaining the local distinctiveness of settlements, rural villages and Conservation Areas iv) vi) Reducing the impact of traffic on rural villages and Conservation Areas. On the "Sites recommended for Consultation for Potential Release from the Green Belt", Saughall Massie is shown as "Add to Settlement Area 5 - Mid Wirral". We feel that this is a retrograde step and Settlement Area 8 should be retained. We would object to this change from Settlement 8 to Settlement 5 as it would then incorporate Saughall Massie within an urban sprawl zone rather than as a rural settlement resulting in the aforementioned encroachment, urbanisation and loss of agricultural character which is integral to the village's conservation status. The additional traffic resulting from the release of these lands would be significant - adding to the considerable congestion already evident in the area.</p> <p>Parcels SP004A & B: North of Saughall Massie Village. The Arrowe Brook runs along and through this parcel of land and the EA's Flood Risk map for this area of the Wirral shows that the field is at serious risk of flood towards the main road. In addition, over 60% of the brook as it travels alongside the field is shown as a "moderate" risk of flooding. This risk can only increase as anticipated weather changes impact upon the local climactic conditions. The height of the Arrowe Brook may also be affected by the predicted rise in sea levels as much of the land in this area is below sea level at the present time and is only protected by significant flood defence mechanisms along the nearby coast at Leasowe. Historically the land was marsh and was regularly flooded by the sea before the flood defence walls were constructed. Parcel SP001: North of Greasby and running down to the Saughall Massie By-pass and up to Pump Lane. This parcel of land is a considerable size (47.91 hectares). Apart from the encroachment and urban sprawl which would result from building on this land, it also has a considerable flood risk. The Arrowe Brook and Greasby Brook run through the fields and on the EA's flood map, they have considerable areas where the flood risk is considered as maximum. As climate change progresses, this flood risk can only increase and become a significant issue for any properties that might be constructed in the locality. Any additional development upstream of Moreton (i.e. Saughall Massie) would lead to increased river flows in Arrowe Brook and would compound the flooding issues (both fluvial and surface water) in Moreton as well as increasing flood risk in Saughall Massie itself. National Planning Policy states that developments should not increase flood risk elsewhere and Developers will have to produce a flood risk assessment. In practice, however, they are only required to show that their development would not make flooding worse up to a 1 in 100 year storm event {plus a contingency for climate change}. We know that climate change means we are already exceeding this 1 in 100 year storm levels much more frequently. On the Wirral we had in 1 in 461 year storm in 2011. The surface water sewers in Moreton which are flooding are designed to cope with a 1 in 20 year storm - which is already being exceeded on frequent occasions. Increasing flood flows in Arrowe Brook will only exacerbate these problems! We believe that, based on the updated 2016 based household projections the justification for Green Belt release does not exist. We believe that, given the revised figures from the Government, the case for Exceptional Circumstances has been largely eroded. Especially when considering the availability of significant brownfield land sites on the Wirral. We therefore contend that the proposed release from the Green Belt of the Land Parcels SP001, SP002C, SP003 (Saughall Massie Village Conservation Area), SP004A & B and SP005A would contravene the Council's own policies on Heritage, Protection of the Green Belt and Historic Settlements and would irretrievably damage the Conservation Area of Saughall Massie Village, taking away some of the key elements in the Conservation Area Appraisal which made the settlement unique amongst Wirral's historic villages. Releasing SP003, Saughall Massie Conservation Area, from the Green Belt would significantly impact upon the Village's heritage setting. The Green Belt designation benefits from Green Belt purpose in protecting our heritage setting and thus the integrity of the village's historic agricultural identity. We also contend that there are no exceptional circumstances which justify releasing these parcels of land from the Green Belt for development. The Council has not been able to demonstrate the need for removing the Green Belt designation, given the significant number of empty houses in Wirral, the amount of brown field land currently available, amended CNS figures for the Wirral and the lack of economic growth which is predicted for the area.</p>
DOR00297	<p>I strongly object to the proposed building development on Bromborough Village car park and Civic Centre. The negative effect on the village will be devastating. Small businesses will suffer, shops will close, it will become a ghost town. I use the car park daily, it is often full and I have to drive around to find a space. The fact that the council have sanctioned parking in the village, is in itself, proof that a car park is needed. The library and civic centre are a vital part of the community. The library plays a huge part in educating people of all ages and is a cohesive presence for local people. Many and various activities take part in the centre supported by local people and those of the surrounding area. Should this vandalism be allowed to take place this precious resource will be lost, loneliness and isolation will increase. When planning permission was granted to redevelop the public toilets it was done so on the proviso that the facilities in the Civic Centre would be available as an alternative. What are the proposals now? Are there any? I look forward to your response, especially to the question of provision of public toilets.</p>

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DOR00298	<p>Wirral's Green Belt, with its splendid views, walks and recreational areas, and the very distinct identities of its various communities, were key reasons why we and many other residents chose to live on the Peninsula and raise a family. All this is now at risk, unnecessarily so and we need your help to change things around. Its time Wirral Council stopped blaming everyone else and delivered a Local Plan through a process which gives its Residents real participation and reasonable time to determine what is needed and how it should fit in and around THEIR communities. Instead, there is an apparent determination to release Green Belt and reap short term rewards. This was brought home to us recently when a senior Council Officer calmly announced that developers and the Council see Greenfield development as simple, quick and lucrative. This is just NOT acceptable. It is a flawed approach that must change. We understand that independent professionals, with a different objective and approach, have demonstrated there is NO need to release ANY Green Belt land to provide in a timely fashion even the original, inflated 'Housing Need' let alone the much lower requirement in line with the latest official growth forecasts. We therefore demand that the people are heard and that the current process is altered to allow proper involvement of Wirral's Residents, free from the present headlong rush, in order to ensure community identity and our glorious Green belt are retained for the continued delight of Residents and Visitors alike, and more importantly for future generations to enjoy. Please don't fail us. Our desires should be taken as instructions.</p>
DOR00299	<p>I wish to strongly protest against the possible release of Wirral's Green Belt for some of the following reasons (although not conclusive):</p> <ul style="list-style-type: none"> • The number of houses suggested is not required on the Wirral - we do not have the infrastructure to support such an increase in population - our roads, schools, hospitals and doctors' surgeries are already inadequate for the current population. • Wirral's population has not increased in recent years and does not need to - there are no jobs here - residents need to travel to Liverpool, Chester, Manchester etc. · Hundreds of properties across Wirral are empty and many in need renovation - which would be preferable to destroying our Green Belt and building new houses which will not be the required 'affordable' housing. • If new houses are built there should be a restriction to them being purchased as 'buy to let' in the 'affordable' sector - high rents are causing the housing crisis - people cannot afford to save to buy a house due to paying high rental payments. • In relation to the land SPO60 - between Irby, Thingwall and Pensby - why and on what basis was it agreed that these individual settlements for hundreds of years are now classed as one settlement - I do not remember any public consultation on this matter? • The Green Belt is needed for the wildlife - bats, field mice, migrating birds, resident birds - buzzards, owls, kestrels etc., native birds, livestock, places to exercise dogs, for walkers, runners etc., places for children to learn about nature and wildlife - in order for them to try and find a way to save this planet we are intent on destroying. Green areas reduce carbon emissions. • SPO60 and many of the other Green Belt sites have archaeological significance - we are throwing away our history. • It is only the council which will benefit from releasing the Green Belt for 'executive' housing by increased revenue from the Council Tax.
DOR00300	<p>I am writing in relation to the proposals to dispose of the Bromborough Civic Centre and Bromborough Village carpark in order to build residential properties. We held a meeting in Bromborough Civic Centre and there were a lot of strong feelings expressed about this. Traders felt that they would lose their businesses if the carpark was no longer there and that Bromborough Village Shopping Centre would die. Also that the Civic Centre is the heart of the community and many social activities are held here, as well as the library. There is a petition of about 3,700 signatures, but I wondered what response you had from residents and traders. We urged people to fill in the consultation, but I am worried that people have been discouraged from doing this, as they have been told that the Council will not listen and have just signed the petition and I am aware that there is well strong opposition to this proposal. Having spoken to colleagues who are managing the Local Plan Consultation they have confirmed that the reason why these two assets were included in the consultation exercise was due to them being of possible interest to the Wirral Growth Company. The discussions with the Growth Company are in their infancy and their priority area for development will be Birkenhead and Bromborough (Business Park). I did answer a letter from a local resident which I have attached this for your information. What I was keen to point out was that any changes to community assets would be very carefully considered along with the necessary consultation of the users of these assets. I am confident that the Growth Company will be able to deliver better facilities in the future replacing many tired, costly and unsuitable assets we currently have; this is the message I feel we need to get out to residents. I realise the car park is a different concern, but again car parking will be considered if there is any proposed development in the future.</p>
DOR00301	<p>I have come to the conclusion that Wirral Council administration has not got the best interest of Wirral residents in their plans. I wanted to write directly to you to request for you to do everything in your power to stop the Council scare mongering Wirral residents. Having observed the Council meetings and read all the information available about the green belt policy, I can honestly say I fully understand the people who say "let the government takeover". Of course, we want the local people to decide the local plans, sadly though, we lost all confidence in the current administration to do the right thing on this matter. I want the government to take over so I can make my representations directly to them. 1. I have found hard evidence to demonstrate that your letter and the information your administration shared with us contain inaccurate facts and therefore is misleading. 2. Accurate figures demonstrate that it is perfectly possible to meet the housing need without touching any parts of the green belt. 3. I have seen a copy of the letter from the Development Director at the Peel Group to yourself, giving evidence that you are not willing to solve this issue in the benefit of the Wirral residence. 4. Your figures about the amount of houses needed on the Wirral are inaccurate and/or out of date. 5. There are green belt sites in your proposal which are not suitable at all for affordable housing. Therefore, should not be part of the Plan.</p> <p>Current plan is terribly rushed due to the Council's failure to develop a well prepared objective plan in a timely manner through adequate consultation with its local residents who would be most affected by such plans.</p>

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	<p>In addition, there are green belt sites in your proposal including SP058C, D and E, which are not suitable at all for affordable housing which what Wirral needs therefore should not be part of the Plan. The plan needs to focus on delivering what Wirral needs, not on making developers rich. Counting on high council tax from few houses on the green belt is a flawed calculation. It will not solve Wirral's problems. The up-to-date accurate figures are on their own evidence that Wirral's real housing needs can be solved without touching the green belt. Therefore, we have to ask: What's the alternative motive behind the Councillors' desire to open up the green belt. To conclude I have lost all the confidence that the current administration is not capable of meeting the needs of the current residents yet alone future generations.</p> <p>Wirral Council are now compounding their lack of a 'Local Plan' with a rushed and flawed Review and Public Consultation. Their actions do not match their words about protecting our beautiful Green Belt on which the attraction and tourism of Wirral depend. On the contrary, the Council are still determined to release Green Belt for development even in the wake of much lower Growth Forecasts, from national and local sources. The high 'Housing Need' figure for Wirral, blamed by the Council on Government, was clearly based upon the Council's own inflated Growth assumptions and used to justify saying Wirral's 'Housing Need' could not be met without building on Green Belt. However, independent professional research had concluded even that former high figure was deliverable with NIL release of Green Belt. The new lower Growth Forecasts should make this easier to achieve which is the expressed wish of residents like ourselves. Wirral has vast untapped amounts of buildings and land outside of Green Belt to supply sufficient housing of all types throughout the Local Plan Period and beyond. To start with, Peel Holdings have confirmed up to 6,450 units can be delivered at 'Wirral Waters'. Yet, despite Officers confirming Phase One is "fully viable" due in part to a £6m Government Grant and New Homes monies, the Council have not included a single new dwelling in its First or even Second 5-Year Period and just 1,100 homes after 15 years, why?</p> <p>There are also thousands of Brownfield Sites and approved schemes, 16,000 existing planning consents and up to 6,000 empty houses to be brought back into use, plus opportunities for significant conversions, normal applications and 'Windfall' supply and more. Sadly, little is being made of much, whilst Officers appear happy to state that developers and the Council see greenfield development as simple, quick and lucrative. All this when your predecessor wrote to the Council saying, "This is not an area of high housing pressure. Not only are we protesting about the probable, completely unnecessary loss of Green Belt land but also the lack of time being afforded the public to engage properly in the process of deciding what is really needed and where in and around our communities development is best located having due regard to all factors including support infrastructure and already stretched public services and facilities. We appeal to you to redirect the process, still led on Wirral but with sufficient time to properly involve willing residents like ourselves, believing this would deliver a more robust Local Plan in a shorter overall time.</p>
DOR00302	<p>I would like to raise my objections to the potential building on Lever Causeway Green Belt land. My reasons for this are as follows: 1.) There is sufficient land in urban areas to build upon. 2.) The population projection does not warrant for 12,000 houses. 3.) It will spoil the character of the area and the neighbouring conservation area. 4.) Lever Causeway and it's open spaces provide an area for relaxation and exercise for innumerable local residents as well as wildlife. 5.) Unrivalled views will be destroyed, irreparable damage to its setting. 6.) Increased traffic and major congestion. 7.) Acres of prime agricultural land will be lost. 8.) Damage to Mount wood Conservation area. 9.) The sites either side of Lever Causeway are huge. Once released from Green Belt, building could extend to Storeton, causing unrestricted sprawl, with historic Storeton and Bebington Merging. 10.) Use the Wirral's already empty 5,000 properties and the already existing space on brownfield sites for 18000 homes. 11) I am also concerned that any proposed development will affect the resale value of my property. This is unfair given the level of investment we have placed into the property to ensure we maintain the standards of living in the Mountwood Conservation. 12) You have also misrepresented the use of the land in your reports. The land is in fact used for agricultural purposes (arable farming) rather the classification you have given it of pasture and horse grazing. 13) At its border with Mount Road, Wirral Council has recently sent me notification that the section of trees located on the land will shortly be subject to tree preservation orders. Clearly, any such development has the potential to jeopardise this important area of natural habitat and the wild life it supports. The trees also act as an important filter for the carbon that is emitted from the traffic using Mount Road. I would be grateful if you could confirm the methodology used for identifying this area of green belt land as a potential development site. I would also be grateful if you could acknowledge receipt of this email. I have requested acknowledgements to previous emails sent on this matter, but regrettably none have been forthcoming to date.</p>
DOR00303	<p>First part same as DOR00298 but with the following additional statement: We also understand that eventually finding land will be a problem and that beautiful apartment blocks would then have to be built, safe, with parks or gardens and amenities like shops, pubs and places of entertainment, around them on much smaller pieces of land. So why wait for that time when we will be forced to do the right thing and not start now doing the right thing to minimize that future problem and maybe having to think of using Green Belt then? Think now of our children and grandchildren!]</p>
DOR00304	<p>I am writing to object to the release of any Green Belt Land which is being proposed under the latest Local Plan. I am a relative newcomer to Wirral. I started working in West Kirby in 1985 and travelled from my home in Aintree, Liverpool until I moved to West Kirby in 1994. I moved to Irby in 2000. My parents lived in Bootle (Sefton Council) when they were children and they often told me about the times they had when they were children - the countryside was just a short walk or bicycle ride away. These stories were difficult for me to believe because I have only ever known hundreds of houses to be situated in the places which my parents knew as farmers' fields. There was no such thing as the Town and Country Planning Act when my parents were children. Fields at the bottom of my road are currently used for grazing animals. This Green Belt designated land (reference SP060) will be released for development under the Local Plan. I do not want to tell my grandchildren (currently 14 months old and 9 months old) about the good old days before a housing estate was built on these farmers' fields. Once these fields are developed, or partially developed, they will never be returned to agricultural use. Land adjacent to the brook which flows through these fields is owned by the National Trust. It is a common sight to see groups of ramblers, kitted out with boots and backpacks, walking across these fields. This walk can be experienced and enjoyed by everybody. Walkers will not have such an enjoyable time if they end up walking through a housing estate instead.</p>

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	<p>These fields are also of historical importance as this is the site of a Viking horse-racing track [reference 1]. I have read that the actual number of dwellings required to be built is hotly disputed and it would be more sensible to develop brownfield sites first until a clearer picture of future housing need emerges over time. I appreciate that it is much easier and cheaper to build on greenfield land rather than on brownfield sites but future generations will never forgive us for wasting such precious resources. I understand that there are over 6000 empty properties which could be refurbished and brought back into use. If this refurbishment is too expensive for Wirral Council to implement, then perhaps some of these properties could be sold cheaply to people willing to renovate them. A scheme in Liverpool which sold some derelict council houses for £1 has had some success and the scheme was heavily over-subscribed. Please use your influence to ensure that no Green Belt Land is released for development - Wirral needs you!</p>
DOR00305	<p>Wirral with its splendid views, walks and recreational areas, and the very distinct identities of its various communities, were key reasons why we chose to stay. Irby has already become a black spot for rush hour traffic in recent years, it's been nearly 9 years since we moved to the area and every year seems to be getting worse, trying to get to the M53 is no mean feat in the mornings. Along with this and the fact that we already have so many primary schools that are at full capacity makes me wonder if any real research has been done when proposing the green belt sites. On the first numbers released on the limbo land plantation (SP019B/SP019) alone, this would increase the % of residents by over 20% in the area, how would the community cope? What plans have been looked at for infrastructure in these communities. Any at all? Being part of the local meetings held recently its felt like Wirral Council are blaming everyone else other than themselves when it comes to delivering a local plan on time and the fact that massive parts of the Wirral's green belt is up for release. This was brought home to us recently when a senior Council Officer, calmly announced that developers and the Council see greenfield development as simple, quick and lucrative. This is just NOT acceptable, not acceptable when we seem to be sitting on hundreds of brownfield sits and does anyone really know the number of houses needed? We just seem to hear a different each week at the moment and that's worrying in itself. We understand that independent professionals, with a different objective and approach, have demonstrated there is NO need to release ANY Green Belt land to provide in a timely fashion even the original, inflated 'Housing Need' let alone the much lower requirement in line with the latest official growth forecasts. Research by local residents of our road Parkway, Irby has also confirmed what we had been told several years previously by Westlink. The land behind our houses should be protected due to the below findings in the report issued for the install of the underground HDVC & the grading of the land by Natural England as 3b [Reference is made to an Environmental Appraisal Report relating to the Wirral Foreshore - Connah's Quay Underground HVDC Cable]</p>
DOR00306	<p>I am a Wirral resident born and bred and am greatly concerned about the council's plans to ruin this lovely peninsular. I write to express my disappointment about the fact that the Council are considering building on our precious Green Belt and feel that the building of the new Fire Station at Saughall Massie has set a precedent in order that they may continue to build wherever they please. I believe that there are brownfield sites and other urban land that could be made available and surely these should be the first areas to be considered. There are also many empty properties in Wirral which could and should be made into suitable, affordable housing. Building on Green Belt will completely ruin the character of Wirral and also will have a detrimental effect on tourism. Wirral is fortunate to have a stunning environment with miles of coastline, beautiful countryside and large areas of open green spaces. Let's try to keep it this way. New figures indicate that there is no need to utilise these green spaces so more thought should be given to investigating other alternatives.</p>
DOR00307	<p>I write to advise you of my objections to Wirral Borough Council's plans and their threat to the Green Belt. I must make it clear that I do not oppose building on the Green Belt absolutely. It may be necessary for the provision of housing where there is no alternative. I should also point out that the present proposals do not affect me directly. This is not a case of Nimbyism. I do however categorically oppose the proposal of Wirral Borough Council (WBC) for the following reasons:- 1. Following their failure to perform their legal duty to produce a proper Local Plan on time, it was only when the Government threatened the possibility of a form of direction from Liverpool City Region that WBC stated that they could produce the Plan in two months, a process that should take two years if carried out properly. As a result WBC has not applied the government formula properly. It brought in outside consultants to produce a report showing that parts of the Green Belt should be released but the consultants pointed out that their report had to be based on the Projections of Growth prepared by WBC. It is those projections which are wildly exaggerated. 2. Wirral is not an area of high housing pressure. Compared with most other local authorities WBC has a much greater area of brownfield land and buildings including the un-redeveloped docks, de-industrialised areas, cleared former housing areas, both many and large, as well, as thousands of empty homes waiting to be brought back into use. Despite this, the area of Green Belt which is proposed to be released is ten times the average for other local authorities. 3. Given their situation the houses to be built on the Green Belt are likely to be at the higher end of the market when any shortage of housing is at the lower end, for first time buyers for example. Indeed the areas that are in need of development and investment in Wirral are Birkenhead, Wallasey and New Ferry, not those adjoining the Green Belt. 4. I cannot see why WBC is not prepared to respond to reasoned arguments and objections by various local bodies including Irby Thursaston & Pensby Amenity Society. WBC continues to publish misleading and inaccurate information in support of its case and seems to be determined to pursue its policy regardless of valid and substantiated objections to many of the steps in the purported rationale of its proposals. I do not know whether it is being disingenuous or simply incompetent. The above points are set out briefly in principle only. The detailed supportive facts are those set out in the papers produced by the Wirral Green Space Alliance with which I agree.</p>
DOR00308	Same as DOR00298
DOR00309	<p>I would like to register my objections to the release of green belt land and have the following comments:</p> <p>1. Projected Population Growth No Government has determined how many homes are to be built by Councils since Labour's Housing Targets were abolished. All Wirral Borough Council's (WBC's) figures stem from the Office of National Statistics (ONS, a non-ministerial department, independent of Government, reporting directly to the UK Parliament). It is the ONS who have published revised</p>

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	<p>figures recently, which are very helpful to the case against release of Green Belt and they should be correctly considered. WBC's own projections of Growth (of population and local economy) and those of their Consultants, together with ONS figures were applied to a Standard Formula (agreed by Parliament for all councils). WBC's Growth Predictions are exaggerated, a contention supported by the latest published data. There is flexibility around the methodology of arriving at an 'Objectively Assessed Housing Need' (OAN) and Councils are urged by Government to challenge the 'formula' results in order that local and 'Exceptional Circumstances' are taken into account. WBC has NOT challenged Wirral's results in any meaningful way nor taken up the opportunities offered to discuss and develop the standard methodology, this should be carried out as a matter of course. Options for using inherent flexibility and arguing modification of the scale of Housing Need, though encouraged by national policy and the Secretary of State, had NOT been taken up meaningfully. 'Exceptional Circumstances' and historic Local Factors had NOT been pushed. WBC's past and current approach has led to widespread belief of a determination to release Green Belt to show some development is occurring and reap a financial benefit. This concern was heightened by the WBC Officer Presentations at recent Public Meetings and suggestions since the much lower ONS figures were released that some Green Belt will STILL be released. The Council has continued to argue its case (of inevitable and "enforced" release of Green Belt) even when there was updated data available (before the latest reductions) showing that their Growth assumptions were far too high, especially as the Local Plan process is required to keep up-to-date with relevant input figures. It did not keep up-to-date, this should be addressed.</p> <p>2. Brownfield Register Errors pointed out during WBC's Brownfield Register Consultation process have led to reductions of availability but few, if any, additions, with the Officer statement that those identified as additional would be reviewed/appraised next time ... i.e. in 15+ years. This approach is flawed and should be corrected.</p> <p>3. Wirral Waters WBC's response to enquiries why only 1,100 'Wirral Waters' homes were in WBC's Brownfield Site capacity figures was that detailed Planning Consent is necessary before schemes can be included. This is fundamentally incorrect and runs counter to the 2017 Appeal Court Ruling which made it clear to Councils, developers and others that developments only need to be "reasonably possible", not even "probable" and definitely not "certain" or of proven deliverability. This Ruling not applied as it will significantly tip balance towards NIL release of Green Belt?</p> <p>Irby, Thingwall and Pensby Amenity Society (ITPAS) ITPAS had provided the Council with its detailed appraisal of ALL Green Belt Sites within its Area (Irby, Thurstaston, Pensby, Thingwall, parts of Greasby, Barnston, Heswall) , using Criteria for exclusion from consideration publicly consulted upon by WBC and used in their Consultants' own Appraisals, plus the 5 Principles of Green Belt and other key factors in WBC publications. ITPAS's assessments (representing over 600 residents) and WBC's own Criteria for exclusion of Sites were almost completely ignored in the rushed and flawed shortlisting of 48 Green Belt Sites. This should be correctly reviewed and the shortlisting of the site re appraised. Were the Council determined to protect Green Belt (as now claimed), why did it keep quiet for 2 years about its Consultants' conclusion in 2016 that Release of Green Belt land was inevitable? Surely, the Consultants would have been required to find circumstances where this was NOT inevitable, arguing a more reasonable, lower Growth Rate. Wirral Council is now compounding their lack of a 'Local Plan' with a rushed and flawed Review and Public Consultation. Their actions do not match their words about protecting our beautiful Green Belt on which the attraction and tourism of Wirral depend. On the contrary, the Council is still determined to release Green Belt for development even in the wake of much lower Growth Forecasts, from national and local sources. Wirral has vast untapped amounts of buildings and land outside of Green Belt to supply sufficient housing of all types throughout the Local Plan Period and beyond. To start with, Peel Holdings have confirmed up to 6,450 units can be delivered at 'Wirral Waters'. Yet, despite Officers confirming Phase One is "fully viable" due in part to a £6m Government Grant and New Homes monies, the Council have not included a single new dwelling in its First or even Second 5-Year Period and just 1,100 homes after 15 years, this approach should be corrected to reflect the potential of 6450 units. There are also thousands of Brownfield Sites and approved schemes, 16,000 existing planning consents and up to 6,000 empty houses to be brought back into use, plus opportunities for significant conversions, normal applications and 'Windfall' supply and more. Sadly, little is being made of such, whilst Officers appear happy to state that developers and the Council see greenfield development as simple, quick and lucrative. Their approach is unacceptable and needs to be corrected. The isolated nature of Green Field sites and access to facilities e.g. regular public transport, shops etc. has not been considered. The roads in and out of Irby, Pensby and Thingwall and the Arrowe Park traffic light junction will be incapable of accommodating any significant rise in road traffic densities. The impact upon core services such as schools, doctors will be severe if any extensive green belt development is carried out.</p>
DOR00310	<p>As concerned residents living in the Wirral, we are opposed to Wirral Borough Councils proposal to build on Greenbelt/Greenfield sites when there are Brownfield sites aplenty. Our opposition is based on the wholly unnecessary proposed destruction of these irreplaceable natural assets which is the heritage of generations yet to be born. Due to WBC's tardiness in respect of their legal obligations in creating a plan, we are given a period of just 6 weeks to discuss, digest and formulate a response to their intolerable proposals, thence this direct approach to you. After reading the following, we and several groups of concerned citizens, hope that you will initiate an inquiry/become involved/ or appoint an inspector to investigate the extremely dubious behaviour of Wirral Borough Council. The following information and statistics are extracted from a document which is produced by Wirral Borough Council (annually for the past 10 years) entitled 'Wirral Compendium of Statistics 2017' the authors of which ascribe a 95% accuracy rate, figures in most cases sourced from O.N.S. Wirral's population has been stable for 20 years, though between 1996-2016 it has fallen by 1,500 persons (p.12)</p>

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DOR00310	<p>Wirral population projection of a 15 year period to 2030 shows a fall of 6,544 persons (all ethnicities). (p.14) W.B.C. recognises homelessness in Wirral to be below ‘average’ (p.2) of their Report. This is borne out by a report in the local press i.e. Liverpool Echo reported on 2 November 2015 in response to a query re homelessness “Parliamentary answers” stated there to be 305 cases on Merseyside, 54 of those in Wirral. It has been asked, at Public Consultation Meetings, why these grossly exaggerated house building figures have not be contested, as Local Authorities are invited to do by Central Government Directive (section 44) of ‘Planning Right Homes in Right Places’. WBC’s response is that they are legally obliged to follow Government Directives, whilst paying lip service to protecting the Greenbelt. However, they are engaging with building companies who are clamouring to get access to Greenbelt sites. Several local farms are affected, some already closed down, several local landowners have complained of receiving unsolicited and unwanted approaches from large building companies – in short a free for all. It is felt that the public meetings described as ‘public consultations’ are more dictation and incomplete in their format. They explain the ‘Why’ (forced by Central Government), they explain the ‘How’ (by destroying the green spaces) but give no illustration or detailed description of the NEED. The meetings therefore are incomplete and not fit for purpose. They should be restarted when full and clear information can be presented to a deserving Public. Surely you would agree it to be normal practice at such presentations to use tools which clearly display demographic variations and trends, population fluctuations/projections by age, birth/death rates, gender, ethnicity across historic timelines and future projections? In short, the Council committee members should prove their point of reasoning and justify their proposition to the Public. Although readily available in the Councils ‘Compendium of Statistics’ none of these are displayed or even highlighted in WBCs presentation. No copies are made available at meetings, its existence is not even referred to by Council officials. When brought up at the meeting it was not up for discussion. As far as protecting the Greenbelt is concerned, the Labour controlled Council have consistently and unanimously voted in favour of building on the Greenbelt whenever the opportunity has arisen. There are reported to be 18,000 Brownfield sites available in Wirral, more than enough to meet even the most grossly exaggerated expectations, so one asks why even consider the greenbelt option? The answer appears to be unrealistic Economic Growth expectations. Based on historic figures and the Councils own projections for future population growth, housing needs to not warrant the building of the proposed 12,000 houses on any site, either Green or Brown. The Peel Group appears to have recognised this by scaling back their promised 13,000 houses (in 2010) to a more realistic number to be actually delivered. I believe some housing will be needed, but not of this magnitude and rejuvenation of deprived areas of our borough is most certainly required. Areas of Wirral such as Birkenhead, Tranmere, Rock/New Ferry and others are some of the most deprived in the country and should not be ignored, especially to produce unnecessary and in most cases, unaffordable houses. There is no current shortage of houses in the Wirral house market, in all price bands. In closing, pleased be assured that the comments made in this letter are sincere, in good faith and with prejudice.</p>
DOR00311	<p>I am writing to you as a concerned Wirral resident about the Local Plan and its impact on the Green Belt. Wirral’s Green Belt, with its splendid views, walks and wildlife was the major factor in choosing to live and raise a family here. It appears that all of this is now at risk and at a time when it is widely broadcast that our natural habitats and the life within them have never been more under pressure due to the actions of man. I have attended several meetings and am disappointed by the absence of the Council Leader, the lack of imagination shown by the council planners and the unsubstantiated numbers being used as the premise on which to release Green Belt land. I am very concerned that there appears to be a determination to release Green Belt and reap short term rewards rather than consider the actual needs of current and future Wirral residents. In August 2018, the Council Leader sent a letter to households across Wirral, including my own, which said that he had challenged the housing needs target of 12,000 new homes by 2035 and that he would do everything he could to ‘protect the special character of Wirral’ – fantastic news, one would think. Unfortunately he hadn’t challenged the number – he didn’t write to the Secretary of State until the 7th of September and I’m not aware of any actions taken since to protect the Green Belt. Despite the ONS producing much lower revised figures I have not seen any further documentation from the council showing how they would in turn reduce the peninsula’s housing requirements. On the contrary, at a recent constituency meeting, Assistant Director stated that he thought it unlikely that these values would decrease but that personnel from the University of Liverpool would be inspecting the figures. I will admit to being naïve about various aspects of the Local Plan but common sense would suggest that you begin the process with accurate figures rather than those which are the most lucrative for developers and possibly councillors alike. Common sense would also suggest that you review other available options first before turning to the Green Belt. These would include: • 6450 homes to be built by Peel Holdings; • commencing building of at least 2000 homes which have already been given planning permission but on which work has yet to begin (It is well known that many developers land bank and, as it is unlikely that developers would deny themselves the profits that would be released from building, this would suggest that maybe there is not quite the demand for housing that has been assumed.). • bringing up to 6000 empty homes back into use; • redeveloping brownfield sites (where there is the potential to build up to 18000 homes) including derelict shops and businesses The housing White Paper states that “Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements”. I would suggest that Wirral Borough Council has not fulfilled this obligation and as such needs to reconsider its current position and devise a Local Plan that properly meets the needs of the communities across the peninsula.</p>
DOR00312	<p>We share your concerns for minister’s gung-ho approach from afar as regards Wirral’s precious green belt land. We appreciate that changes are inevitable as the population increases. We find ourselves writing this letter in response for "residents to get involved" as home owners with adjoining gardens that could easily accommodate a new build project, we like many others across Wirral and the rest of the country are bound by the view or wishes of someone who no longer owns the land, very often is no longer alive or their views are back in another era and no longer valid, otherwise known as a covenant. As far as we understand this is rendering a huge amount of viable building plots of land all over the country uninhabitable. We would happily consider building a dwelling on our land and although it’s a mere drop in the ocean in the big picture it is still a drop that multiplied across the country would be more than a substantial drop in that ocean, if the government could somehow release land owners from this situation and enable those land owners that were willing to build new properties to build I can imagine a stream of new housing would become available ,also creating a tremendous spin off in work and building associated trade sales etc. As we have mentioned are own personal situation is as follows, we bought our house back</p>

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	around ten years ago. We viewed the side garden as just an area of pleasure with no particular urge to develop. As time goes on and we get older we have to consider the possibility of downsizing, this could be achieved simply and effectively if it were not for the existing covenant which could have helped out with the housing situation whilst creating a more comfortable and secure projection in our later years to come.
DOR00313	Same as DOR00298
DOR00314	<p>I would like to register my objection to the proposed release of green belt land on the Wirral. There are many reasons why Wirral Council should refrain from considering green belt for development of housing.</p> <ul style="list-style-type: none"> • Develop brownfield sites. The largest of these - Wirral Waters/Peel Holdings - is said to be ready to go with planning applications lodged with the council, including Legacy/Wirral Waters which alone could deliver 500 units. Combined with other projects in the pipeline, Wirral Waters has the potential to deliver 6,450 in the next 15 years. • The existing stock of un-occupied council properties should also be refurbished as a matter of urgency. • Develop windfall sites, for example boarded up plots and land on which school buildings stand, but are no longer in use. • Properties in all price ranges are on the market, the stock exceeds the demand. The population of Wirral is declining and this unique geographic area, the beautiful Wirral peninsula should not have to slavishly follow the government's national formula. I was glad to see the council is raising the issue of housing targets after it emerged that household growth in the borough is set to be lower than predicted. Regarding SP058B - SP058D SHLAA3033 Land at Pipers Lane1. There is no infrastructure, access, roads, sewers or utilities in this very rural area. 2. This expanse of gorse and bracken forms a backcloth for the Wirral Country Park and the Wirral Way, which runs along the old railway line. It has already been designated as of special landscape value because of its proximity to the Wirral Way and The Wirral Coastal Path. 3. The Wirral Way is an amenity for walkers, rambler groups and cyclists who regularly use it during leisure pursuits. We are all encouraged to be more active 4. Ponds and woodland in this coastal area are important for nature conservation, they are designated as priority habitat. 5. Every year Shel duck migrate to this area during April and remain until July when they depart with their new hatch. They are ground nesting birds. Numerous mallard and geese live in the ponds and coastland of Wirral's Deeside. Buzzards, hawks and Kites roost in the Woodland on the Oldfield Ridge, between the Akbar and Pipers Lane, they catch their prey in the gorse and fields on the Deeside Coastal Open Space. 6. In autumn and winter, Wirral's coastline is one of the best places in the country to see huge numbers of wading birds such as knots, dunlins, curlews, sanderlings, oystercatchers, grey plovers and bar-tailed godwits? They come in their tens of thousands to feast on the rich mudflats of the Dee Estuary and North Wirral shores. 7. Dee Cliffs are designated SSI sites. 8. The Wirral Dee coastline is of national and international significance. This area is precious to our wildlife in a world of rapidly diminishing habitat.
DOR00315	<p>I am writing to raise strong objections to the proposals to include numerous greenbelt sites across Wirral in the Council's Local Plan for housing development. While I have a number of general points to raise about the proposals to make greenbelt land available for development, I will also make a number of points specifically about the proposed inclusion of one of the sites the Council has identified – North of Gills Lane, Pensby (Map SP061 in the consultation documents). General points about proposals to make greenbelt land available for development. I strongly object to the proposals to make greenbelt land available generally based on the following points:</p> <ul style="list-style-type: none"> • The housing need projections on which the proposals are based have already been found to be massively incorrect. I understand that the most recent ONS figures indicate that only around 7,000 houses will be required over the next 15 years rather than the 12,000 on which the proposals are based. This revelation should, in itself, be enough for the Council to put a halt to the proposals and go back to the drawing board, not continue with a consultation based around misinformation. • In view of the correct housing need estimate being little more than half the original estimate, the housing needs for the next 15 years can without doubt be met entirely through development on brownfield sites across Wirral (which are estimated to have enough space for as much as 18,000 homes). There is no need to develop on greenbelt land full stop. • I understand Wirral currently has around 5,000 unoccupied properties. These, in themselves, are almost sufficient to meet the housing needs and should be utilised instead of greenbelt land. • The vast majority of the sites are (unsurprisingly, given their greenbelt status) picturesque areas. Clearly, any housing built in those sites will have added value and will be sold at a premium. These will not be affordable houses by any stretch of the imagination. • I understand that Peel Holdings have committed to building 1,100 homes at Wirral Waters over the next 15 years. This will also reduce the housing need and this should be factored in to the projections. The Council should also make much stronger efforts to encourage Peel Holdings to greatly increase the number of homes that they will be building over the next 15 years. • Building on the greenbelt will destroy the unique character of the areas of Wirral where the proposed sites are situated. Unrivalled views will be lost and habitats for wildlife destroyed. • The infrastructure and amenities in many of the areas where development is being proposed are not sufficient to cope with an increased number of residents.*Specific points about proposals to remove the land to the north of Gills Lane, Pensby from the greenbelt. As a resident of Thorncroft Drive, the road that dissects the greenbelt land on the north side of Gills Lane, I strongly object to its inclusion in the proposals based on the following points: • I understand that one factor to be taken account of when considering removing greenbelt status is the need to avoid merging villages and towns so that they lose their distinct identity. Building on the north side of Gills Lane would have the effect of merging Pensby with Barnston at one end and Thingwall with Barnston at the other. So it would effectively merge three villages and they would lose their identities. • The local infrastructure and amenities are not sufficient to cope with more residents, never mind 504 as proposed! • Gills Lane is already a dangerous road for a couple of main reasons. Firstly, it is a heavily used through road on which cars regularly exceed the speed limit. This is despite the fact it has a number of blind corners and very narrow passing points. I have been told that, officially, there have been no major traffic accidents in recent years. However, those of us who have lived in the area for many years will recall several accidents down Gills Lane going back decades, including at least one fatal accident. It is also known that there have been accidents that have gone unreported (for example, there is a hole in a fence near to Thorncroft Drive where a car clearly came off the road a couple of years ago). Secondly, Gills Lane has no pavements for much of its length, which makes it hazardous for pedestrians, particularly when considering the point above. The only pavement runs between Thorncroft Drive and Pensby Road and this is currently (and very regularly) covered by overgrown

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	<p>hedges because the current landowner refuses to maintain them, despite residents regularly reporting this to the Council. This forces pedestrians to walk onto the road at a particularly dangerous part of the road where it narrows at a blind corner. It is only a matter of time before this results in a serious accident. If houses were to be built on the land at Gills Lane, there would be massively increased traffic and pedestrians and this would clearly exacerbate these problems. • Gills Lane is a country lane with a unique character. It offers lovely views across the fields that are included in the proposals towards Cross Hill Reservoir and beyond to the Liverpool skyline. It has also long been associated with horses and equestrianism. Horses currently graze on the north side of Gill Lane. If houses were built on the fields identified in the proposals, this uniqueness, the views and the horses would be lost. • The area identified on the north side of Gills Lane includes a field to the rear of Thorncroft Drive, which is currently part of Wirral Donkey Sanctuary. This field is used for grazing by donkeys and horses that are owned by the sanctuary. If this field was made available for development then the sanctuary would no doubt close, which would put the lives of the animals and the future of a community asset in jeopardy. • I understand that the field mentioned in the previous point above has, beneath it, a major pipeline running from Cross Hill Reservoir. Clearly, building on this field would restrict access to this should any works be needed. • The rear gardens of the vast majority of the houses in Thorncroft Drive are very small and shallow. However, the fact that they back onto open spaces gives the impression they are larger than they are and makes them bearable for the residents. If the fields either side of Thorncroft Drive were built upon, this would have a major adverse impact on the quality of life of the residents there. • There is abundant wildlife within the fields to the north of Gills Lane. This includes birds that are rare in these parts such as goldfinches and pheasants. Building on these fields would destroy their habitats.</p>
DOR00316	<p>There has been considerable debate about the housing 'requirement' due to the questions being raised about the statistics. As Eastham ward members we believe that the consultation process should be paused. The list of suggested sites should be withdrawn until such time as all the issues around the 'numbers' required has been resolved. The seven sites referred to in the files attached are:</p> <ul style="list-style-type: none"> • SP048 Land at Lowfields Avenue; • SP049 Land South of Mill Park; • SP050 Land south west of Rivacre Road; • SP051 north east of Rivacre Road; • SP052 Eastham Village Conservation Area; • SP054 Land around and near Carlett Park • SP053 and 54 comments on specific sites <p>I refer to the sites in Bromborough. As a regular visitor to the local shopping centre by bicycle and occasionally by car I have looked at the usage of the car park. There are rarely underutilised spaces, even early on a weekday morning. The loss of any spaces would be detrimental to the attractiveness of the local shopping centre. It would be difficult to construct a new library or civic building without disruption to existing services. It is conceivable that a new corner development could be created with the library on the ground floor. That would, however, question the visual relationship and heights of surrounding properties. The construction of any properties on the western side of the main car park could lead a loss of many spaces, at least 35. This would be extremely damaging to the local shopping centre.</p> <p>I have received representations from a local resident at Park Road concerning this site. I have visited the site and noted the presence of two healthy trees. These would reduce the capacity of the site. An issue has been raised regarding access from this site on to the A41. Turning northwards is possible; turning across the road to go south is very difficult.</p>
DOR00317	<p>I would like to place my objection to the proposed allocation of green belt for housing development in Wirral. My objection(s) is/are based on the following beliefs: • Local population growth does not warrant this. • Wirral has existing empty housing stock. • Planning applications have approval but are not moving forwards. • Lack of central government funding for infrastructure</p>
DOR00318	<p>I have a number of objections to the current plans to develop greenbelt land, while appreciating that people must live somewhere. If greenbelt land is to be used it should be equitable throughout the Wirral. Why should Irby with 1.9% of Wirral's population bear the burden of 24% of Wirral's housing needs. It has a population of 6110 of Wirral's 300,000+ and proposed greenbelt houses are 1771 out of a total of 7390. Has anybody thought of the congestion that will be caused at the road junctions Thingwall Corner and Arrowe Park heading to Birkenhead and Liverpool and the M53, if that number of houses are built. There is no other direct link to these destinations. Also in Irby Village with traffic turning to Thurstaston and Heswall. Irby village already seems like a parking lot at certain times of the day, with frequent tailbacks at this junction. What extra provision is there for health care and increased primary school places albeit that half of Pensby School is empty.? The proposed development would mean the loss of high quality agricultural land and of increased pressure on our local country parks such as Harrock Wood and Thurstaston Common, and Irby playing fields - Important recreational areas for the residents of Irby. Why have only 1,100 new homes rather than Peel Holdings 6,450 included commitment been included in WBC's Draft Local Plan, and when it granted Outline approval for 13,500 new homes the complete target for the next 15 years? Presumably when it granted outline planning permission it thought that the proposals were "reasonable and demonstrable" This number of new homes would completely rule out the need for greenbelt land to be used.</p>

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DOR00319	<p>We are writing to alert you to what must surely be an ERROR or OVERSIGHT in Wirral Council's Local Plan Development Options Review of Proposed Housing Allocations September 2018 in including the site references SHLAA 1249, SHLAA 1250, SHLAA 1418, SHLAA 2049 and SHLAA 3034 in the proposed housing allocation plan so we are requesting that Wirral Council remove these sites from their Local Plan. I shall also address these concerns to our local Rock Ferry Ward Councillor, who has presented similar concerns relating to these sites, on behalf of the local community, several times already, and who we hope will raise these matters with yourself and Wirral Council's Cabinet, or ask another appropriate Councillor on the Scrutiny Committee to do this, if this is not her particular role. We shall also ask her to address the following concerns to the Forward Planning Manager by email to localplan@wirral.gov.uk. Hopefully by being so thorough it will be impossible for these issues to be ignored or lost sight of, as has happened at least four times already in the past</p> <p>SITES SHLAA 1249, SHLAA 1250, SHLAA 1418, SHLAA 2049 and SHLAA 3034 ARE ALL IN THE CONSULTATION DISTANCE OF A MAJOR HAZARD. All five of these small sites are actually situated beside each other off Bedford Place, Russell Road and Mersey Road and within the consultation distance (CD) of Tranmere Oil Terminal. Two of these sites (SHLAA 1418 and SHLAA 3034) have already been recommended for refusal of planning permission by the Health and Safety Executive, the former, SCHLAA 1418, on 15th September 2005 (APP/ 2005/5516E) due to its proximity to the oil terminal's pipelines, and the latter, SHLAA 3034, (APP/17/00630) on 19th July 2017. Development in these areas would not only put new residents at risk of harm but also put existing residents at increased risk of harm. As a Councillor for the Birkenhead Tranmere Ward, in addition to being Leader of Wirral Council, you are surely aware that Tranmere Oil Terminal is an Upper Tier COMAH site, subject to the Control of Major Accidents Hazards Regulations 2015 (previously COMAH Regs 2006; 1999) enforced by the Competent Authorities, which are the Health and Safety Executive and the Environment Agency; and that Tranmere Oil Terminal being an Upper Tier COMAH site and classified as a major accident hazard, the Health and Safety Executive is a STATUTORY CONSULTEE whose role in the land use planning process is in providing local planning authorities with safety advice on developments in the proximity of major hazard sites or major accident hazard pipelines. The sites SHLAA 1249, SHLAA 1250, SHLAA 1418, SHLAA 2049 and SHLAA 3034's extreme proximity to Tranmere Oil Terminal (where they are blocked in beside the Major Hazard on two sides by the Rock Ferry Industrial Estate and the Rock Ferry/New Ferry by-pass and sandwiched between the by-pass and the New Chester Road) can be more fully appreciated if you consult Wirral Council's document "Urban Site Plans 5-449 pdf" on page 22 of 46 which shows the plan 228-Fiveways (Phase 2), New Chester road, Rock Ferry. In the top right hand corner of the 2016 Ordnance Survey 100019803 you can see Tranmere Oil Terminal and can also see that the SCHLAA sites listed above might fit into the nearest 40,000 cubic feet Major Hazard Installation (MHI) and its bund. This is just one of many massive storage tanks at the site, supplying crude oil to the refinery at Stanlow, which in addition to all the hazardous pipelines which handle the cargoes of the crude oil tankers that visit the oil terminal regularly, often simultaneously, form part of the major accident hazard. All five of these small parcels of land are helpfully bracketed together in the initial listings of Wirral Council's Local Plan Development Options Review of Proposed Housing Allocations Map Book but somewhat confusingly presented in the Ordnance Survey maps on disparate pages, meaning their location within the immediate consultation area of the major hazard zone is not obvious.</p> <p>Description and History of these Sites provided.</p> <ol style="list-style-type: none"> SHLAA 1249 North of 70 Mersey Road, Rock Ferry (on page 49 of 113 in the Map Book). This small site is closest of all to the notifiable hazard, Tranmere Oil Terminal, and just separated from the bund and nearest 40,000 cubic feet tank by just the width of Mersey Road and the by-pass. It borders a sharp dangerous corner where Mersey Road has been blocked off by the Rock Ferry Industrial Estate, and turns sharply at a right angle into Bedford Place. It is clearly unsuitable for development and also has two beautiful ancient trees in its far corner, which should have preservation orders for their protection if they have not already been listed. It was saved from auction by a community petition presented by Councillor in November 2014. SHLAA 1250 Rear of 72 to 88 Bedford Road and rear of Mersey Road (on page 50 of 113 in the Map Book). This is a landlocked site, having no vehicular access other than the narrow passageways at Bedford Road and Mersey Road and has been a community open greenspace for decades. It is the only local enclosed greenspace that is a safe place for local children to play, ride their bikes, play ball games etc. being overlooked by all the rear upstairs windows of the houses on the north side Bedford Road and the rear of most houses in Mersey Road, and more recently by the rear of houses on Russell Road, and is not next to a major road like the playground beside the New Chester Road. Members of the local community use it frequently in good weather to sit out etc. so it functions also as a community garden. Houses on Bedford Road and those on Mersey Road have just very small yards, or in a few cases on the south side of Bedford Road just tiny gardens, unsuitable for healthy recreational purposes. As a community greenspace it is vital to the health and wellbeing of the local community. It's preservation has been the subject of community petitions both in November 2014, and in June 2017, both presented to Wirral council by Councillor. SHLAA 1418 the compound off Bedford Place As mentioned in point 1. of the first paragraph, this site was refused planning permission on 15th September 2005 (APP/ 2005/5516E). A community petition and many letters of objection and with repeated requests for Wirral Council to consult with The Health and Safety Executive resulted in a recommendation for refusal. The Health and Safety Executive recommended refusal due to the proximity of this site to the oil terminal and its hazardous pipelines. This site was also withdrawn from auction in November 2014, and further following its misdescription by auctioneers, withdrawn yet again in February 2018 (this year). It is bordered by trees which should be subject to preservation orders. SHLAA 2049 north of 91 Russell Road is a thicket of shrubs and mature trees. The south side of Bedford Place is bordered by beautiful trees, providing the community with oxygen and helping to neutralise contaminants from the by-pass, the Rock ferry Industrial Estate and Tranmere Oil terminal. These trees, so lovely, particularly now in Autumn, should also be subject to preservation orders.

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	<p>e. SHLAA 3034 Rear of 91 to 99 Russell Road, Rock Ferry. This site, also within the Consultation Distance, was auctioned on 2nd December 2015 and labelled as Land at 89 Russell Road. An unlawful land grab of almost half of the adjacent site SHLAA1250 (the local community enclosed green space) was attempted on 18th April 2016 by an unauthorised bulldozer. Alerted by councillor, this attempt was thwarted by officers from Wirral Council, who told those responsible to replace the bulldozed land. Unfortunately they did this together with so much building rubble that the Council mower could no longer cut the grass in that area. The local community is hoping in the future to make a wild flower meadow in that part of the enclosed community greenspace</p> <p>A planning application APP/17/00630 for the erection of four two storey self-contained buildings at this site off 89 Russell Road was lodged on 24th May 2017. A community petition detailing the many objections to this application and signed by 70 people from 48 different local households was both delivered by email and presented by Councillor. A further copy of this petition can be emailed to Wirral Council as most of the the local community's objections apply to all the sites that are the subject of this letter. We do not propose to trouble our neighbours with yet another petition raising the same objections so soon after the one last year.*On 19th July 2017 planning permission was refused by Wirral Council for many pertinent reasons, the fourth being: "The site is within a Health & Safety Executive (HSE) consultation zone for development near notifiable hazards: Essar Oil Ltd and could put the safety of future occupiers at unacceptable risk. This is contrary to the advice of the Health & Safety Executive and to Policy PO9: Criteria for Development Near Notifiable Hazards". Please do not be complacent about these matters. There was a terrible fire on 13 April 2010 at Campbeltown Road that caused the closure of the RockFerry/New Ferry by-pass, and which caused traffic to be gridlocked on the New Chester Road. Evacuation of local residents may have proved impossible if the fire had escalated and spread to the major hazard and if evacuation was necessary, although the only emergency advice we have ever been made aware of is "GO IN, STAY IN AND TUNE IN", which is hardly a plan . Also this year there was a large fire at the edge of the sites called SCLAA 3034 and SHLAA1418. This particular site had been used to store a number of old caravans, old vehicles, tyres etc. and regularly and persistently the smoke from toxic fires that smelled of burning rubber would emanate from this site. We understand that a number of local people reported this to Environmental Health. Due to prevailing westerly winds this black acrid smoke used to blow in an easterly direction i.e. towards residents on Mersey Road, the River Mersey and the Oil Terminal. However since the larger fire of March 17th 2018, when the wind happened to be blowing from the east i.e. in a westerly direction towards the New Chester Road, this use and practice has completely stopped and there has just been a white van parked there, much to the relief of local residents. This site may have become contaminated by the aforementioned uses, which occurred at regular intervals between April 2016 and 17th March 2018. Wirral Council has chosen NOT to provide Bedford Place with street lighting for many decades meaning it has often been used by fly-tippers. This could easily be remedied by the provision of street lighting and cut cameras. The site called SHLAA 1418 at Bedford Place could be developed as a community garden and similarly equipped. A request for funding to help transform this area into a place of natural beauty might be made to the owners and/or operators of the major hazard. It is already bordered by beautiful trees. SHLAA 1671 is listed as 156-162 Bedford Place. This is incorrect. It is actually on Bedford Road. SHLAA 0483 13 Green Lane (Scrapyard) This site is likely to be contaminated with explosive and toxic underground gases, hydrocarbons, heavy metals and a cocktail of chemicals from its use as a vehicle disposal unit and would require extensive site remediation before it could ever be fit for human habitation and at a cost that might exceed its value for housing. While we understand that Wirral Council wants to preserve as much of its green belt as possible it should not be at the expense of potential harm to residents on its industrialised, highly populated eastern side.</p>
DOR00320	<p>Objection by Eastham Councillors to the removal of SP048 from the Green Belt</p> <p>Pages 84, 85 and 86 of the Summary of Initial Green Belt Assessment refer to this area as providing public open space, being subject to a local biodiversity designation, also as containing the Lowfields Site of Biological Importance, and referred to in the LCR Ecological Network. The issue is whether designating the area as 'Urban Greenspace' would prevent a developer challenging its designation. Ward members have noted the letter submitted by Satplan of London, dated 22 September 2016, which takes SP048 and 49 together. This letter suggested that access could be created from connecting Lowfields Avenue directly to Eastham Rake. The most south-westerly corner of Lowfields Avenue (properties 28-38) is close to the motorway with a limited separation. The land between Lowfields Avenue and the motorway has developed into a natural woodland since it was left bare after the construction of the motorway. It, therefore, provides landscape value when viewed from the elevated M53.</p> <p>Objection from Cllrs. Mitchell, Gilchrist and Carubia to the removal of SP049 from the Green Belt</p> <p>Land to the south of Mill Park (SP049) falls within Settlement Area 4. Access to SP049 might be achieved from the A41 close to the M53. For safety reasons, it is likely to need further junctions and traffic lights. The A41 is heavily trafficked. It is said to be operating at capacity. The Council recognises this by referring to highway and transport capacity (page 87) in the commentary and summary of potential. The NPPF is conscious of such issues: • Alternative ways of reaching SP049 may involve the use of Mill Park Drive and local side roads such as Thorn leigh Avenue and Kingsley Avenue. The ambitions set out by Barton Willmore (Dec 2014 and July 2016) and Spawforths (Jan 2014) alluded to this. • There is already congestion in Eastham Rake and queuing in Mill Park Drive as the local road network struggles to cope at peak time. • Local residents clearly expect the Council to have maximised the use of brownfield land and do all it can to secure development on land that has planning permission already. • The open land on the southern and western fringe of the Mill Park estate provides a buffer which has been used for turf growing, a wooded area and a field that is still in cultivation. -The document 'Eastham Former Wooded Estate' has a brief reference to the built form and Kingsley Avenue. It describes the landscape quality and condition as 'poor-moderate' with the declared strategy as 'enhance and restore'. In the case of land near to the M53, a degree of caution should be used given the levels of traffic, pollution and noise. The Council has chosen the M53 as a strong barrier for convenience. This understates the potential importance of this area for agriculture.</p>

DOR REF	RESPONSE
	<p>Eastham Ward Councillors' comments on SP053</p> <p>a. Land between 112 Ferry Road and 1 & 3 Bankfield Drive: This land is reported as having a capacity of 10 dwellings. Ward members consider that this land should be retained in the Green Belt, that the line of trees to the east should be retained. It is presently let for agricultural purposes for livestock rearing. This function helps create a buffer between areas built in 1900 and 1930. It adds to the value of the experience of visitors travelling along Ferry Road so contributes to the visitor economy.</p> <p>b. Land to the rear of 82 Ferry Road and the Scout Hut. Access might be taken from Bankfield Drive. This would place development very close to the COMAH site and loading/unloading facilities.</p> <p>Eastham Ward Councillors' comments on SP054 c. Land to the rear of 15 – 23 St David Road. These properties have long gardens. We are not aware of the views of the householders here. We do not expect proposals to come forward for the insertion of additional dwellings here. Eastham Ward Councillors' comments on sites referred to in SP054. d. Allotment Land to the north of St David Road. Particular concerns have been raised about the allotments reached by the narrow access. It is noted that these could be protected as Urban Greenspace. Ward members regard these as an important amenity to be retained. Objection from Cllrs. Mitchell, Gilchrist and Carubia to the removal of SP050 from the Green Belt The Council's Initial Green Belt Review included a Proposed Methodology in October 2017. "6.23 The Landscape Character Assessment provides an assessment of the landscape quality of each of the landscape character areas and considers the capacity and sensitivity of the landscape in each landscape character area to accommodate change without having a severe detrimental effect on their character and integrity". The Council's document on the Eastham Former Wooded Estate (2010) contained Landscape Guidelines which were clear about the need to "Conserve the sense of separation between Eastham Village and the larger conurbation of Eastham through retention and management of boundary vegetation and narrow wooded gateway entrances into the village". The key quality of the land between the A41, M53, Rivacre Road and Eastham Village is that of the 46.84 hectares some 25.94 or 55% is amongst the best and most versatile agricultural land. It has come to our attention that 'Mill Lane Estates is currently promoting land west of Riveracre Road in Eastham capable of delivering up to 960 homes'. The Council has suggested that up to 592 dwellings would go on 39.45 hectares. The 'Commentary and Summary of Potential', page 88 in the 'Summary of Initial Green Belt Assessment for Public Consultation' makes it clear that development of SP050 would 'also completely enclose Eastham Village with Urban development' and that SP050 would 'introduce a discordant outrigger of urban development into the open countryside unless part of a wider release to the north and east of the M53... The question arises as to whether this would be a sustainable community. One or more places giving access on to the A41 New Chester Road would need to be provided. Access to Rivacre Road would completely change the character of that area. Given the pressure on local school places, the need for the provision of extra school places arises. In CWAC Milne Homes have agreed to provide for 56 extra places at Childer Thornton. If Wirral were to adopt the suggested strong boundary of the M53, all the land to the north of the M53, up to the present built up areas of Eastham, would be given up to housing. Were land to the south of Mill Park (SP049) to be released as well, there would be very extensive development providing significant pressures on local school and health services. Fortunately, SP0 49 consists of 91% of agricultural land. This area includes a large woodland with ponds known as David's Rough. It is part of the Eastham Former Wooded Estate Landscape Character area. The commentary and summary of potential refers to the protection of existing ponds and woodland. Work is needed to survey this area and ensure that the flora and fauna is protected. If any rarer species such as bats and greater crested newts are reported as being in this area, full account of their potential presence must be taken.</p> <p>Objection by Eastham Ward Councillors to the removal of SP051 from the Green Belt</p> <p>The area to the north east of Rivacre Road has a complex history. Areas of former roads (North Road) and concrete hard standings remain over seventy years after the end of World War 2. Views towards the River Mersey are interrupted by storage tanks. It is adjacent to the Nynas oil refinery and an extensive area of chemical storage tanks. These are major constraints to development due to the large COMAH public information zone to the north. Evacuation of residents from new homes would be difficult to achieve at this location. It is likely that there would be few purchasers or renters for such an isolated location. To the south, there is the 'Go Kart track'. Due to the programme of track and circuit events, coupled with the modest noise attenuation, the area cannot be seen as suitable for housing. Residents of the village and Ferry Road find that their peace is regularly disturbed if the wind is in that direction. Despite this, the land still has 44.4% described as the best and most versatile agricultural land. Ward members would strongly oppose any access created on to Rivacre Road. The area is isolated and might be thought to benefit from 'opening up'. However, traffic travelling north to Eastham Village would cause damage and disruption on the narrow road into that community. SP051 has some potential as employment land. This could be achieved using the 'special' or 'exceptional justification' without removal from the Green Belt. Notwithstanding this, it is essential that access is via the M53, West Road and North Road, as opposed to any route via Eastham Village, Ferry Road and then Bankfield Drive. 'Employment use' is a wide general term. The introduction of further chemical processes in the area would be challenged by ward members who share the long voiced concerns of residents around air pollution. When the wind is from the east, the emissions of the process plants in Ellesmere Port are noticeable. The hedges and trees eastern side of Rivacre Road should be enhanced and a buffer zone of additional planting created. A buffer zone should also be set up at the north western corner where the old, abandoned line of North Road is close to the village.</p> <p>Objection by Cllrs. Mitchell, Gilchrist and Carubia to the removal of SP052 from the Green Belt</p> <p>Attention is now drawn to the description and interpretation of 'small'. The Village is set within areas that fall within settlement area 4. The overall strategy for Settlement Area 4 was set out to include: 6. Preserve and enhance the character and appearance of the Conservation Areas at Port Sunlight, Bromborough Pool, Bromborough Village and Eastham Village and the setting of other designated heritage assets 12. Monitor and manage traffic flows to maximise highway efficiency; address the impact of HGVs on Eastham Village; manage the impact of transport noise; and address air quality issues at Eastham 13. Maintain the physical separation and local distinctiveness of Eastham Village and Storeton and the physical separation between Eastham and Ellesmere Porritt should</p>

DOR REF	RESPONSE
	<p>also be noted that the Core Strategy - Draft Settlement Area Policy for Bebington, Bromborough and Eastham included a vision statement of which this extract highlights “The potential of the coast and other green infrastructure as accessible and rich environmental assets will be being realised. The diverse range of built heritage assets will be a focus for leisure and tourism and for prosperous sustainable communities”. Thus the issues of ‘setting’, ‘character’ and traffic were seen as relevant factors along with tourism. Travel to the south from Eastham Village relies on the rural nature of Rivacre Road. It is, therefore, difficult to see how any development with access to Rivacre Road will not damage the village. Development on Rivacre Road could, therefore, provide additional unwanted traffic causing congestion in the area. Rivacre Road is not served by public transport and development in that area, with no cross boundary services, is most unlikely to attract any operator. The Village Community needs to be involved in detailed work on any potential development. Applicants should not just go through the motions or 'tick box' exercises but ensure that local representatives are meaningfully involved at all stages. Eastham Village is washed over by the Green Belt. Proposals for removing it from the Green Belt must pass this test. Eastham Village has been a Conservation Area since 1974. Eastham Village is well placed to remain as a Conservation Area, protected by its retention in the Green Belt, with the policy carried forward into the new Local Plan. The present policy should not be considered out of date.</p> <p>Objection from Cllrs. Mitchell, Gilchrist and Carubia to the removal of SP054 from the Green Belt</p> <p>The ‘commentary and summary of potential’ on SP055 suggests that land to the north of Seaview Avenue, the Queen Elizabeth II Dock and the Eastham Lodge Golf Club could potentially be released from the Green Belt with no further impact on separation or open countryside. As Eastham Ward Councillors, we question this judgment. As Ward Councillors, we see the section of Ferry Road between the end of the 1930s development as an introduction to the Country Park. There is a change in character from the built up area into an area with a rural aspect. Views are afforded across the river from Ferry Road to the north and east. The legislation which permitted the development of the oil dock recognised that views across the river should be retained. The NPPF allows the community to identify areas of importance, in close proximity to the community and local in character. This area should be seen as part of the continuation of the network of habitat and green infrastructure. The area plays a significant part in Wirral’s Tourism offer by providing a link from Eastham Village to Eastham Country Park.</p>
DOR00321	<p>I am writing to express my concern at the proposals to build on green belt land in and around Irby. I moved to Irby from Liverpool 12 years ago and the attraction to me was the green fields and views of open countryside which give this area a unique semi-rural feel. As you drive into Irby Village from Thingwall Road there is a view right across to Wales. I love that I can access footpaths through fields within minutes of my house and there is a four mile loop through fields and woodland which surrounds the village. Building on this green belt would dramatically alter the character of Irby. I don’t want to walk on footpaths through housing estates and it would make me very sad to lose the view of the Welsh hills. I understand that there is a need for more affordable housing but surely there are other areas that could be used which would not alter the character of the place so substantially. If building on greenbelt cannot be avoided then using an area where there is a larger amount of open countryside with a less established local community to upset may be preferable. For example there are large areas of open spaces near the Clatterbridge hospital site which are not currently accessible to the public and have few local residents; so building on a site like this could provide attractive housing with good road networks, without spoiling the character of an existing community. I enclose some of my favourite photos from my walks through my local open spaces which may be under threat. [Photographs attached for information purposes]</p>
DOR00322	<p>I oppose the current proposals to build on the Green Belt land in the Wirral. The following is a brief outline as to why I feel the Green Belt land should not be built on:</p> <ul style="list-style-type: none"> ● Green belt land is precious ● land was issued Green Belt status for a reason, we need to protect our green spaces and not just panic and think of the easiest solution. ● the Green Belt areas in question will not be used to build social housing that is needed but large expensive properties that the majority cannot afford . ● we should build on brown belt land which is plentiful on the Wirral. ● there are lots of empty premises on the Wirral, homes, shops, businesses, which are not being used. Convert or knock down and build on these eyesores. ● Peel holding already have permission to build the necessary quota of housing - make them do what they promised to do years ago or compulsory purchase the land. ● Green Belt land is not only beautiful but provides a space for walking, cycling, getting fit, enjoying the outdoors. ● if we build on the Green Belt nothing will be sacred and locals in years to come when we have left this mortal coil will have nowhere locally that they can pop to and enjoy. The plans are short sighted and a knee jerk reaction. Please don't allow this to happen.
DOR00323	<p>I wish to express my grave concern regarding Wirral's Local Plan. These are my concerns:</p> <p>1) Flooding</p> <p>We live in an era of climate change and ever more frequent and severe weather. As a result, there is a clear and present danger of flooding following extreme rainfall, especially in those areas which have brooks or rivers flowing through them , which is most of Wirral. An abundance if green fields, therefore, is essential to act as soakaway reservoirs to cope with excess storm water. In my own case, I live about 50 yards from Arrowe Brook and Arrowe Brook has a history of bursting its banks from time to time. This actually happened about 20 years ago resulting in that part of Thingwall Road which passes over the Brook being flooded and closed to traffic. Properties nearby experienced 6 inches of flood water entering their properties with ruined carpets and so on. The water table where I live is high and our back garden and others on the Close (Cope Grove) are frequently waterlogged. About 2 years ago our back garden was flooded after extreme rainfall as was also the garage and lean-to. Floodwater was almost up to the kitchen step. More recently other properties on the Close have experienced problems with water drainage. According to the Environment</p>

DOR REF	RESPONSE
	<p>Agency's website, land close to Arrowe Brook is depicted as being at high risk of flooding and furthermore, the Council's own website states that about 70 properties on Glenwood Avenue are at risk of flooding. The houses on one side of Glenwood Avenue back on to Arrowe Brook. If the fields between Irby and Thingwall are paved over for roads and houses this will result in new properties becoming flooded sooner or later and excess flood water being pushed on to older properties in the vicinity, including my own. it is therefore essential that Wirral's Green Belt is preserved for that reason amongst others.</p> <p>2) Mental Health and Well-Being The beneficial effects for mental health and well-being of living in an area where there are green spaces, have been well documented. We live in a time of austerity and turbulent events. This has resulted in an increase in people experiencing mental distress. This is another important reason for preserving Wirral's Green Belt.</p> <p>3) Biodiversity Flora and fauna are in retreat everywhere. Loss of Wirral's precious Green Belt would result in destruction of wildlife habitats. Wirral should not be adding to the general decrease in biodiversity. I respectfully call upon you all to do everything in your power to amend the flawed Local Plan and protect what's left of Wirral's Green Belt. I am writing in protest at the Local Plan. I cannot support what is in effect the rape of what's left of Wirral's precious Green Belt. Right now Wirral consists of a reasonable balance of urban and rural areas. However, under the Local Plan the character of Wirral will be ruined forever, with the balance tipping towards urban and the borough would end up as one continuous urban sprawl with just a few green spaces here and there - just like the opposite side of the Mersey.</p> <p>I respectfully raise the following points:</p> <ol style="list-style-type: none"> 1) Why do we need so many extra houses and what is the figure based on? 2) Why are both national and local government proposing Green Belt land grab when their own agreed policies are currently to protect Green Belt? 3) Why can't the Council count land which has already been granted planning permission? 4) What about all the brownfield land that is earmarked for both housing and industrial development in the Wirral Waters scheme by Peel Holdings around Birkenhead Docks? 5) Why are they considering obliterating the ancient character of such villages as Storeton, Barnston and Eastham? <p>As well as the above I think that the following observations are very relevant and important:</p> <ul style="list-style-type: none"> • The loss of so much Green Belt would have a negative impact on Wirral's flora and fauna and therefore local biodiversity. The Environment Secretary, Michael Grove has recently stated that loss of habitat is one of the main threats to wildlife. • Also the benefits for mental health and wellbeing of being close to green fields have been well documented. • And lastly but perhaps most importantly there is the threat of aggravated localized flooding if this plan, as it stands, goes ahead. <p>We live in an era where there is a clear and present danger from flooding due to ever more and increasingly severe weather thanks to global warming. Wirral is a particularly vulnerable area in this respect, being a peninsula, bound by a sea and 2 tidal rivers, not forgetting being traversed by several rivers that do burst their banks from time to time.</p> <p>(Attached piece of paper) Housing and Green Belt land requirements to 2032: Wirral council fake news • The council Green Belt 'release plan' covers – 8 square miles or 4,900 acres. • This land could support 71,000 homes (at typical NW density of 14.6 dw/ acre). • But the Government / council housing need forecast is for 12,000 homes. • So the GB land fraction required is only 17% of the council 'release plan'.</p> <ul style="list-style-type: none"> • However based on actual population and household number changes in the last decade and allowing for lower economic growth post Brexit and a slowdown in UK life expectancy improvement, probable new housing need is 200 to 300 houses per annum not 800. • So the land required would only be 6% of the GB 'release plan' in that case. • But the council says it has identified Brown Field sites for 2,400 houses and will build there first. If so the fraction of land required from the GB 'release plan' would be only 3%. • The council has deliberately exaggerated the 'Green Belt Problem' and caused great distress to many Wirral residents for purely political reasons. After the Green Belt review in December 2018 they will claim that they have 'heroically' saved most of the land on their GB 'release plan'... land that was never needed in the first place. • Even so some sites listed will draw the short straw since building on Green Belt is more profitable than building on Brown Field sites for the developers. The council will gain from higher rates from Green Belt luxury homes. Very few 'affordable houses' will be built because of the 'viability test' loophole. The developers gain; the politicians gain; but what about the Wirral residents who elected them who are routinely treated with contempt? <p>[another respondent]: Background in mathematical modelling, statistics and operational research. Visiting professor for 15 years at a leading northern university. Collaborator with several universities in Europe and the USA and led EU funded industrial projects. For some decades led a forecasting research / internal consultancy team for a well-known, major multinational company. Advised senior management and the board on tactical and strategic business planning.</p>

DOR REF	RESPONSE
DOR00324	In response to your letter regarding Wirral Council's Local Plan, I am totally opposed to any building on our precious Green Belt land. These areas are a 'green lung', a habitat for wildlife, a place to be enjoyed by families. I truly hope you will succeed in putting in place a plan which will effectively stop the development of our Greenbelt and ensure only brownfield sites are freed for these developments. The Government plucks numbers out of the air, with no knowledge of the area, or the impact their plans have for local residents.
DOR00325	With reference to the recent circular sent to all householders, one wonders how much of OUR money has been wasted on this. If this Council had done as the Government requested and put forward a "local plan" at the correct time there would be no need for the Government to step in to do the job for you. Our Green Belt is, as it says, is Green Belt and should never be encroached upon. The Peel Group has recently stated that they are to go ahead with the many homes they are going to build and we have many, many brownfield sites where houses can be built on, also many houses are empty and should be brought back into use. It is no use the Council saying they will encourage Peel to move quicker and more extensively to lessen the pressure on our green belt when you are trying to push through the idiotic idea of building expensive houses on our green belt along with a ridiculous golf course. It is time common sense reared its head in the Council
DOR00326	We wish to register our very great concern at the recent proposals to build on Green Belt land in the Wirral. Green Belt land has always been thought of as sacrosanct and certainly on the western side of the Wirral is the underpinning of the rural aspect and character of the area. Whilst we understand that the government have insisted on a development plan, the green Belt proposals in Wirral would inevitably provide extensive housing, hardly the affordable first homes required. It would seem that property developers and their money would override the essential ambience and character of the Wirral. We believe that the projected numbers of housing which the Government believe is needed are completely miscalculated. Wirral is not an area which could supply jobs for such an increase in population. Once the Green belt is lost to developers it is gone forever. We expect that the Council will take due notice of our concerns and not simply pay lip service to the widespread opposition to take these worrying and outrageous proposals.
DOR00327	<p>The site related to a green belt release site at Eastham Lodge golf Club Ultimately the development of the site will help create opportunities for environmental improvements on an area of and which is classed as 'previously developed'. As discussed in the Green Belt assessment the proposed sit does not contribute significantly to the purposes of the Green Belt. The site would not impact any heritage assets, nor is it located in a conservation area. The surrounding land uses are strictly residential so any development would not be out keeping with the local area. The site would therefore be developable and deliverable within 5-years and can contribute to the housing figure in the plan period. A Landscape and Visual Site Appraisal has been conducted to review the impact that development of the site may have on the wider countryside and its potential importance to remain 'open'. With the appraisal it concluded that visually the site is relatively will contained within the local landscape and from recreational routes. Any new development would sit within the containment of the site and there would therefore be no detrimental impact on the landscape of the local area. The vision statement helps support the release of a parcel of land at Eastham Lodge Golf Course to create new development opportunities. Currently the Golf Club has 18-holes and is struggling due to large competition from world renowned golf courses elsewhere on the Wirral. Reducing the golf club to 9 holes will help ease competition and significantly reduce maintenance costs thereby saving the golf club for the future. Although the site wasn't put forward in the Call for Sites for the 2016 SHLAA we have analysed it against the SHLAA requirements. We conclude that the site is not restricted by any development constraints and moreover the site is highly sustainable with good transport links and accessibility to services and amenities. The site doesn't contribute significantly to any of the 5 purposes of the Green Belt as outlined in the NPPF and Local Plan. We feel therefore that the release of Eastham Lodge golf Club from the Green Belt under the new Local Plan will help ensure its existence in the future. Furthermore, the site no longer contributes to the five purposes of the Green Belt as identified in the NPPF and it is considered to be unnecessary to keep open.</p> <p>The green belt parcel within which the site is located has been identified for further investigation as part of this process due to its suitability for potential development when considered against the five purposes of including land within the Green Belt (NPPF 2018, para 134). The viability of the golf course as an 18-hole golf course is in jeopardy and as a result the owners propose to retain half of as a nine hole course and develop the remaining area for housing to fund the changes. If the site was to be developed it is acknowledged that there would be some reduction in the distance between these areas. Nonetheless, the overall distance would remain around 0.74 km which would continue to represent a notable degree of separation. It is worth noting that part of the site would be separated from the existing business park by the existing properties at Carlett Park. Development of the site would result in a slight extension north of the property on a Ferry Road and would run up to the more recent residential development at Carlett Park, not defined as a settlement area. Some encroachment would arise to the north but this may be addressed by a planting scheme appropriate to the local character of the landscape along the northern edge of the site. There are already significant numbers of mature trees within the site along the northern boundary which could be retained and enhanced. Development would secure the future of Eastham Lodge Golf Course albeit as a nine-hole course. It would have limited impact on the character of the surrounding area due to the degree of enclosure resulting for mature trees along the site boundaries, existing residential development and the heavily planted golf course adjacent to the northern boundary. [Vision Statement, Landscape and visual appraisal, zonal masterplan and ELGC letter attached]</p> <p>Greenbelt release at Roman road in Prenton. The green Belt parcel within which the site is located has been identified for further investigation as part of this process due to its suitability for potential development when considered against the five purposes of including land within the Green Belt (NPPF2018, para 134) Green Belt parcel SP030, the area north of Prenton Golf course (SP030E), which includes the site, "would not be visually prominent" and that the "release of SHLAA1880 could also allow existing properties at Roman Road to be brought in to the urban area". If the site was to be developed, not extending beyond the extents of existing development either side of the site, there would be minimal reduction in the distance between the settlement area and the M53 motorway. If the parameters discussed in paragraph 1.24 are adhered to, then development would not extend beyond the extent of the existing residential area of Prenton, reducing the</p>

DOR REF	RESPONSE
	<p>effects of urban sprawl as existing development already protrudes from Prenton from either sites as illustrated on Fig. 5. It acknowledged that some localised encroachment on the countryside would occur by developing the site. however, this may be mitigated by retaining the strong boundary of trees around the majority of the site and retaining an area of public open space to the south of the site and by keeping development within the limits discussed above. [Reports and appendices attached]</p> <p>I want to say that I am opposed to the development of the Green Belt in Wirral but I understand after listening to the presentation that some development is going to be inevitable. Some sites however may be more suitable than others.</p>
DOR00328	<p>The site I mentioned on Tuesday morning is the parcel of land SP059B, SP059C, SP059D on Thurstaston Road, Irby. The reasons I am against the development of this particular site are given below.</p> <ol style="list-style-type: none"> 1. The building of family housing would further increase pressure on local schools. Namely Daw pool Primary and Irby Primary both of which are full beyond their capacity and oversubscribed. This in turn means that parents have to transport their young children to schools further away thus increasing road traffic. 2. There is already traffic congestion and an appalling parking situation around the School Lane/Thurstaston Road junction and it is creeping up to the Sandy Lane/Thurstaston Road junction as well. Please see attached images taken around 15.30 Wednesday 19th September. Daisy and Jake Nursery have only a few places for parking so parent's park across the pavement causing obstruction. Dawpool Primary has no parking at all except on School Lane where walkers and the general public also park. Benty Farm Tea Room has no onsite parking and is only accessible on foot, visitors leave their car on School Lane. Building a housing estate on Thurstaston Road will increase this congestion. 3. There is a lack of public transport on this side of Irby. Only 2 buses a day to West Kirby and 4 to Heswall. Otherwise it is a walk to the village or again, the car. 4. Shopping in the village is very poor. A car journey. 5. The G.P. Surgery is now at Thingwall. A car journey. 6. At busy times of day Hillside Road and Sandy Lane becomes a rat run for cars trying to avoid congestion in Irby Village. There would be little access to local services for residents other than by car. There have been some planning permissions already granted regarding 41 Thurstaston Road: APP/14/00504; APP/16/00385; APP/17/00235. The latest being LDC/17/01249 which was withdrawn by the applicant North Point One, a local property development company. Despite permission being granted to replace the bungalow with a 4 bedroom detached house no work has been done. Permission has also been granted for a vehicular pavement crossing at the site giving access to the Green Belt land. Again no work has been done. However the landowner at 61 Thurstaston Road has installed new hedging and fencing which would make it easier to straighten the bend in the road. Access to his property has also been widened. Why do I get the impression that development on this land is already a done deal at least verbally!! I have two questions: 1. What are the "special circumstances" that would allow this parcel of Green Belt land to be developed? 2. What further investigations does the Council intend to carry out to determine its suitability for development?
DOR00329	<p>My family and I understand that you are currently looking for suitable building land around the Wirral to meet the shortage and longer term local plans for our expanding communities. My family and I own (freehold) 3 ½ acres of land in Greasby which has a bungalow, stables, barn and outbuildings on the domestic curtilage section (approx. 1 ½ acres) and a horse exercise arena and field shelters on the agricultural section. This section of approx. 2 acres falls into the current green belt. We would very much appreciate if you would consider releasing the green belt parts of our property to allow housing to be built on either all or a greater part of the property. We have attached for your consideration a Land Registry map showing the land at the end of Mill Lane in Greasby surrounded by existing houses and a Public house. [Land registry map attached]</p>
DOR00330	<p>The car park is currently designated as part of the Key Town Centre and the Civic Hall & Library form part of the Primarily Commercial Area in the Unitary Development Plan. Town centre uses (shops, offices etc.) are acceptable in principle subject to compliance with UDP Policies SH1 and SH6. Residential development and offices on upper floors could be also permitted under terms of UDP Policy SH7. Parking and servicing arrangements and the needs of cyclists would be a matter for consideration under UDP Policies TR3, TR9 and TR12, alongside SPD4 & SPG42 if a planning application was received. Under the current consultation on the Development Options for the emerging Local Plan, both sites are proposed for mixed use allocation. If adopted, this would make commercial development incorporating residential use acceptable in principle, subject to compliance with Draft Policy CS26 which makes provision for a range of uses that would normally be directed to town centres. Draft Policy CS40 would also require proposals to demonstrate that provision would be made for appropriate on-site parking, including cycle and electric vehicle charging facilities. Issues regarding how the sites are to be used in the future under the Council's wider asset management powers will need to be determined outside of the planning system. [Maps and correspondence attached]</p>
DOR00331	<p>I would like register my condemnation of Wirral Council's proposal to build on our green belt when there is no good reason as the population of the Wirral is declining and there are several brownfield options available. The governments New Homes Bonus does not mean we should erode our green belt. I strongly oppose any building on green belt land as it will increase pollution and there will be no protection for our wonderful wildlife. Councillors should respect the needs of their constituents and leave our green belt alone.</p>

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DOR00332	<p>I am writing on behalf of my mother and I to oppose the development of the green belt land off Barnston Road. Please accept this email as our strong opposition to these proposed plans which appear to affect both the land to the front and rear of our property. This land is GREEN BELT. This is the reason many families have purchased properties in this area. Had the property owners known about these plans at the time they would not have purchased the properties, particularly at the price paid to live in this area. I will be referring matters to our local MP and the relevant cabinet minister. Further, we will be taking advice from a specialist planning lawyer. There are sufficient existing areas on the Wirral that require development and regeneration without the need to attack greenbelt land. Perhaps the Council's attention would be better focused there. Finally, I understand that this farmland has already been sold to a developer. I have concerns as to why a developer would have expended what I anticipate would be a large sum of money without any comfort that such development will proceed. Please also accept this as a request for information under the freedom of information act/ environmental regulations for all information in relation to the greenbelt land in front of and behind Barnston Road.</p>
DOR00333	<p>Inquiry about proposed planning permission. We would like to obtain planning permission for a section of land adjacent to Telegraph Road, opposite Caldys Rugby Club playing fields. The land is a large garden belonging to it is a triangular in shape and could be used to build either one large house or two (semi-detached) houses, which would be in keeping with the other cottages on the lane. The size is approximately one third of an acre. I should also add that it would not impede anyone's view as it is situated under the bank at the beginning of the lane, below the level of the road. The above plan shows the whole plot of land at 1 Dawpool Cottages. We propose obtaining planning permission for the section next to the existing property, beyond the solid black line closest to the property. We believe that development of this land would not impact upon the openness of the Green Belt (being adjacent to the road, and in the building line with existing houses). Nor would this development cause any harm to the openness of the Green Belt.</p>
DOR00334	<p>Today I received a generic letter to Wirral Residents from the Councillor Leader. He states that "Government Ministers have set a housing needs target for Wirral of 800 new homes each year for the lifetime of the plan.....My administration has challenged that number" I am pleased to hear that the administration have challenged the number and would be very grateful if you could share with me any information explaining how, exactly, the administration have challenged the number and detailing what number the administration believes is a more realistic number. As discussed on Monday, Sect 44 of the Government Document "Planning for the Right Homes in the Right Places" states "Deviation from the Proposed Method: Given the significant financial and time saving benefits, our expectation is that local planning authorities adopt the proposed method when assessing housing need. However, there may be compelling circumstances not to adopt the proposed approach. These will need to be properly justified, and will be subject to examination". It is clear from this Government Guidance that the housing targets are not "set in stone" and CAN and should be challenged. I attach some documents written by [another respondent] who is a (retired) professor of Mathematical Modelling and Statistics. I hope you can agree that [another respondent] can be deemed to be an "independent expert". [another respondent's] analysis is based on actual historic population trends, rather than the over inflated ONS statistics. Therefore, I would contend that [another respondent's] analysis could be used as a basis to prove the compelling circumstances required to "not adopt the proposed approach" for calculating housing needs.</p>
	<p>The Green Belt review will seek to remove land from Green belt status – therefore the term “inappropriate development” will no longer apply to the land as it will have had its green belt status removed. If the Council passes this motion, (to ensure inappropriate development on green belt land) it will do nothing to protect the sites across Wirral which the Council are planning to REMOVE from Green Belt status. An amendment to this motion should be submitted which calls on the Council to work with Developers, Peel Holdings and the Wirral Growth company and also owners of empty properties to ensure that no land is released from Green Belt status. An amendment to this motion should be added which goes further and states that the Government “target” of 12000 can and should be challenged. Independent analysis from [another respondent] see attached), and others, has shown that there is compelling evidence not to adopt the proposed approach and the targets can be significantly reduced. Again, this target is not set in stone and Government Guidance. Therefore an amendment to this motion should state that Council noted that there may be compelling evidence not to adopt the proposed approach (for calculating the housing targets) and should review information provided by the public and independent experts to challenge the Government's targets. “Council accepts the conclusion of Officer's technical analysis that there is insufficient brownfield land to accommodate the government's housing target for Wirral” and “there is currently no alternative to reviewing the potential of land in the green belt”. Comment: With recent statements from Peel Holdings that they are prepared to build up to 6450 house within the Local Plan period and the compelling evidence that the government targets are overinflated, plus the empty properties on the Wirral - an amendment to this motion should read “Council does not accept the conclusion that there is insufficient Brownfield land on the Wirral and there are alternatives to reviewing the potential of land in the green belt in order to submit a legally compliant Local Plan to the Secretary of State”. “Agrees to make representations to the Government against the issuing of top down housing targets which fail to take into account the housing needs of areas like Wirral”. Again, the Government Housing Targets are only a starting point and, as described above, can be challenged! Council should assess the housing needs of Wirral (using historic data such as that analysed by [another respondent]) and make the case to the Government that the housing targets can be reduced. [Web article provided; motion extracts provided and amendments to motion suggested]</p> <p>I am writing to you, as Councillors, the people who make the decisions which affect our climate, to urge you to ACT NOW! On Monday 15th October, at the Council meeting, you will have chance to debate and vote on motions which will determine what will be the future for Wirral. We must ensure that we all play our part in ensuring that the effect of Climate Change is minimised. We cannot go on destroying our trees and greenspaces, concreting over flood plains, destroying food producing farmland and encouraging even more increases in traffic and pollution - all in the name of "jobs and economic growth". It is simply not sustainable anymore and the consequences for us and our children WILL be dire! It is no good just signing up to Carbon reduction Strategies - you have to implement them, and you have to do it NOW! I urge you to use your votes at the Council meeting to ensure that we protect ALL our Green Belt, abandon the extremely environmentally damaging</p>

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	Hoylake Golf Resort Project and move Wirral forward in a sustainable way which will benefit all of the residents of Wirral, not just the Developers who want to destroy our beautiful peninsula (and our planet) for profit! [Article/hyperlink provided to highlight climate change report in support of argument]
DOR00335	<p>Wirral Council is considering the release of Green Belt to meet housing requirements. The total area that is being considered appears to be approximately 2000 hectares. Regardless of the exact amount, or what portion of this is finally developed, there is a need to strategically assess the effect of any such release of land on biodiversity, for which the Council has a duty of care. Whilst Green Belt's original purpose is not biodiversity conservation, it achieve this purpose though remaining green and hence having its land use determined by farming practices, including farming and environment schemes, rather than development plans. The Council has acknowledged this in their screening of sites for release, which includes consideration of biodiversity constraints through the Liverpool City Region Ecological Network map and the WeBS (waterbirds) core counts for farmland. Both of these data sources are used to identify parcels that may not be fully available for development. However, this screening misses a large part of the Council's obligations to biodiversity through the National Planning Policy Framework (NPPF) 2018 and Natural Environment and Rural Communities (NERC) Act 2006. Priority species are those on the section 41 list of the NERC Act. This includes a number of species for which Green Belt outside of the Core Biodiversity Areas (the ecological network and WeBs count areas) will be of critical importance. The section 41 list includes Great Crested Newt (also a European Protected Species), Brown Hare (Wirral Biodiversity Action Plan priority species) and a number of declining farmland birds including for example Yellowhammer, Reed Bunting, Grey Partridge, Tree Sparrow and Linnet, all of which occur outside of the Core Biodiversity Areas and do not necessarily respond to the "networks and stepping stones" approach, rather requiring blocks of suitable farmland. In order to correctly assess the effects of Green Belt release on biodiversity the Council is therefore obliged to identify where these priority species occur and what proportion of their population or range would be lost under different scenarios of Green Belt release. The 2008 Birds in Cheshire and Wirral, a breeding and wintering atlas is a starting point for birds, but at too coarse a scale and also more than 10 years out of date. The ecological assessment of individual land parcels, which will be carried out by developers once land is released, will only look at each developer's area of interest and so not assess the effect on the Section 41 species within Wirral. Only a strategic assessment, completed by the council prior to considering which parcels to release, can achieve this objective and is a necessary evidence base for this part of the Local Plan.</p>
DOR00336	<p>The Wirral Society is presenting this high-level rebuttal of the options to release Green Belt land for development on the Wirral. There will be a separate detailed response from our professional planner. We are most concerned that the Council has not seen fit to report on the public consultation from 2017 on its Green Belt Review methodology, surely a cornerstone of this "consultation". We are most concerned that the Council embarked upon this most expensive and time consuming "consultation" when it must have known that revised ONS figures were to be produced mid-consultation. What value is the "consultation"? Surely the Council must abandon this "consultation" and re-commence next year with the revised process figures, expected December 2018. The Wirral is effectively an island. There are no possibilities for exchange of land type in the River Dee, Liverpool Bay or the River Mersey. We understand that Cheshire West and Chester have stated they are unable to help with the theoretical "housing need". We would argue that this makes the existing Green Belt and open spaces even more important to the Wirral with the significant contribution to health and CO2 reduction that green open spaces make to the population of the Wirral. The Wirral Society is most concerned that the Council did not challenge the theoretical "housing need" figures from the government, but rather used this as an excuse for proposing a massive release of Green Belt farmland. It is also of grave concern that the Council saw fit to issue a letter placing the blame for the massive proposed release of Green Belt land on the government and Peel at Wirral Waters, yet omitted to refer to its own failure to deliver any of the draft Local Plans it had from previous years. (Reference Council Leader's very costly and inaccurate "Dear Resident" Letter August 2018). The Council has a duty to represent the borough and especially focus regeneration in the old industrial heartlands rather than destroying Green Belt farmland. Ref Purpose 5 of the Green Belt. We welcome the revised ONS figures (2016) forecasting a much-reduced population for Wirral borough by 2035, yet still massively above the historic trend. This lower figure still generates a "housing need" nearly twice that of the old RSS figure of 250 per annum. We understand that a figure of some 488 units per annum are now required, totalling 7,320 over the 15-year period. We have also seen a figure of some 436 units per annum, an even lower "need" giving some 6,540 theoretical units needed. We presume you are seeking the DHCLG's agreement of these figures, as the basis for the finalising of the Draft Local Plan?</p> <p>We know, as does the Council, that Peel have said they consider they are able, with the Council's help and cooperation, to redevelop the derelict industrial heartland of the borough at Wirral Waters and plan to deliver some 6,450 units within the 15-year period. This surely forms the basis to meet any theoretical "housing need" and it is the area on the borough needing regeneration. We must refer to the letter of 10 September (Peel) showing provision of some 6,450 houses on brown field land that is deliverable and so avoids problems with the government's "Housing Delivery Test". We are also aware that the Council has over 2,000 units identified on brown field sites (excluding Wirral Waters) and also has between 4,000 and 6,000 empty properties that could be brought back into habitable use. This surely must present a "win – win" situation, with protection of the Green Belt as per NPPF and development in the areas needing regeneration using available brown field land and empty properties. Regenerating the most deprived areas around the old docks and reusing the existing empty properties is surely the way to improve the economic activity on the Wirral and the lives of those in these most deprived regions. From the Appeal Court ruling we know that new home building (including restoration) need only to be "possible" not "definite" and so there is much flexibility in the housing potential. The majority of the 13,000+ units proposed by Peel at Wirral Waters could be considered to meet the theoretical "housing need". We cannot agree with the Council's use of large SETTLEMENT AREAS to interpret the Green Belt Purpose of PREVENTING townships merging. Surely, this PURPOSE applies to towns and villages. It cannot be SUSTAINABLE as per the planning guidance (NPPF) to destroy Green Belt farmland when there are brown field sites and empty houses available. This would be proposing an unacceptable "slash and burn" approach to housing and will leave the most deprived areas without regeneration. There must be a supply of new GOOD JOBS to enable people to buy any new houses. The Council's own figures (SHMA 2016) show that some 40% of residents work outside the borough. Surely, any GOOD JOBS created would be taken by these existing residents before any jobs are available to immigrants needing housing?</p>

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	<p>It is therefore obvious that there are NO “exceptional circumstances” justifying the redefinition of the Green Belt boundaries. We therefore call on Wirral Council to take immediate steps to drop any proposals to release Green Belt for development as there is clearly sufficient brown field land and empty housing to meet this theoretical “housing need”, thus making it clear to landowners and tenant farmers alike, that this threat has been removed. In so doing, we call upon Wirral Council to reconfirm the existing, proven Green Belt boundaries that focus investment into the most deprived areas of the borough. We cannot consider that Wirral Council is short of funding to support the redevelopment of the derelict heartlands, since it has recently voted to lend up to £26m to fund its “vanity Golf Resort”. Surely the focus for this Council should be on bring the old industrial heartlands back into use reducing local depravation. The Hoylake Golf Resort “scheme” and its £millions in costs must at long last be abandoned.</p>
DOR00337	<p>You will know by now that many thousands of people across the borough object strongly to the proposed release of green belt land. You also know that NO green belt land needs to be released AT ALL. We need all the high grade farmland we already have, as once gone, this land can never be retrieved, especially with the uncertainty over Brexit. Likewise, we also need our green spaces for the well-being, enjoyment and recreation for Wirral residents. Much of our green spaces and farmland are important habitats for wildlife. I understand that you will by now have the report of the Wirral Wildlife Trust, and will have read it thoroughly. You owe it to the people of Wirral to take on board their recommendations, especially now that the ONS show that no green belt land needs to be released. I urge you to put in place protection for our farmlands, especially now that we should be producing more of our own food. I urge you to consider the mood of the people you are meant to serve and to act in a democratic manner by NOT release green belt for development. Your personal legacy otherwise will be the council which destroyed the character of this borough for future generations.</p> <p>I am writing to voice my concern about the potential release of green belt land on the Wirral. This is despite many thousands of people objecting to this proposal, and the fact that, due to new information, no green belt land now needs to be released. The consultation period has been rushed and was too short. You will by now have access to the report submitted by interested parties, including Wirral Wildlife and archaeological societies, who object to development on most of the “parcels” of land for excellent reasons. The loss of green spaces and farmland would be devastating for future generations and wildlife. It is difficult to understand how this council would be able to fund any new infrastructure required, when they are not funding the current infrastructure, which is crumbling. The 5 points for the green belt we hear so much about would be invalid if development were to proceed. For instance, communities would merge creating urban sprawl, green spaces would be spoilt, and this council is refusing to consider brownfield sites only. You will have heard arguments against specific land parcels, so please listen to what professional bodies such as Wirral Wildlife have to say.</p> <p>I am writing concerning the proposed release of green belt land throughout the borough. Many people are rightly outraged that should this happen. Communities, wildlife and farmland will never be the same again, and will be lost forever. You have a moral duty to protect all that is beautiful about our borough, not to destroy it. I will cite one example- Greenhouse farm, Arrowe Road. The copse at the centre of the farm is a site of biological importance, and many species rely on the wood and the surrounding fields for food and hunting. A buffer zone around the copse will NOT protect the wildlife or flora who rely on the copse. Also, the hedgerows need to remain intact for the same reason. The infrastructure is not in place to support thousands of extra people and children. There would also be difficulty with access to the site, and the drainage is extremely poor. The top of Rigby Drive is not wide enough to accommodate the extra traffic, which is already a nightmare with three schools very close. During recent times, planning applications have been turned down for this land three times- twice for a mobile phone mast, and once for a cricket pitch. It would therefore be completely wrong and even hypocritical to release land anywhere on this farm now. A protected copse is good, but not nearly good enough- the whole farm needs to be kept within green belt status. The farm is not council owned land, therefore there is no need to release it from green belt. We would therefore have to speculate about the nature of any "relationship" between the planning dept. and Leverhulme Estates if the land is released. I am sure that for the sake of propriety, there is none. You will be hearing alternatives to releasing green belt land. Please listen to them and vote accordingly. We will be very interested to see which way your vote will go. Please do the right and moral thing,</p>
DOR00338	<p>I'm responding to the letter I recently received from Wirral Council outlining proposals under the WIRRAL COUNCILS LOCAL PLAN to develop green belt land both near my home (Irby) & within the borough. I am not only strongly against the proposal, but I'm also very concerned (appalled) at the way planners/the council have readily concluded that developing Wirral Green Belt land is acceptable & the only route to meet the statutory Local Plan. Why choose to develop green belt land over: 1. Redevelopment of extensive Wirral 'brown field' sites? 2. Urban land, residences/properties? 3. Land owned by Wirral builder/developers with outline planning (if they aren't prepared to build the required houses then they should be forced)? to meet any required government driven statutory plan? Any suggestion that Green Belt is the only solution remaining, is both short sighted & unacceptable to the majority of Wirral residence. The whole proposal makes no sense at all! Wirral's beautiful Green Belt land & green spaces are critical to the borough, they are its heart & lungs! Not only essential for the health & well-being of all its residents, but also to the natural flora & fauna of the region (such as rare owls, bats, hedgehogs, to name a few), all of which will be lost upon destruction of the green belt. It's not an exaggeration to say that ONCE GONE, IT WILL BE LOST FOREVER! No society is sustainable or can remain healthy without its heart & lungs! There is no justifiable need for the proposed development of the green belt land for housing on the Wirral. Borough population growth is slow & there are no large multinational companies relocating to the Wirral. As such, current needs could actually be met by developing the current brown field sites, etc. with a bit of effort by all parties concerned. Any calculations or assumptions to contrary are just that & at worst, just plain nonsense! In this proposal no clear evidence has been put forward to justify the figure of 7000 extra homes required between now & 2035. The decision to develop Green Belt land on the Wirral should only be as a very, very, very last resort when there is a clear local need or to ensure it remains green for generations to come (i.e. a park, given to National Trust, etc.). It should not be profit driven or because the right thing to do is more</p>

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	challenging! I hope the council & local planning committee re-consider & re-tract their recommendation for the development of the Pensby/Irby & Levers Causeway Green Belt sites.
DOR00339	<p>I am writing to voice my disagreement with the proposals to consider using various pieces of Green Belt land for housing development. Having attended consultation meetings and read about the proposals I am totally against any use of this land until all other options have been utilised. The government has used a “broad brush” approach with flawed methodology to arrive at the figure of 12000 houses it perceives as necessary to meet Wirral’s future housing needs and I am aware that this is under discussion. The excellent open letter that [another respondent] has sent shows clearly that the number required nearer to 5,900. He has carefully researched the actual population growth (or lack of), potential industrial growth and other relevant socio - economic factors to arrive at the conclusion that this figure could actually be even lower based on current trends i.e. 4,400. I know that there are a considerable number of empty houses which need improvement before they can be returned into the housing stock. I find it incredible that this has not been done already and offset into the projected housing requirements. It should definitely be carried out before any consideration on release of Green Belt. There is a considerable amount of Brown Belt land available within already developed areas; again this should be used for Housing before considering any Green Belt. It is quite wrong to leave this land as pockets of unsightly desert within existing urban areas, I grew up in Birkenhead and find it quite upsetting to see how it is being allowed to deteriorate and decline. It desperately needs to be rejuvenated - and quickly - to enable and encourage people to live there thus bringing the focus back into the town centre. I am very aware that there is an increased trend, particularly amongst younger people, to live in existing urban areas as it is easier to commute to work. Increased access to affordable housing rental or ownership utilising the existing good train and bus network, would be very acceptable to many commuting people today and makes sound sense to the alternative of additional congestion and longer journeys. The dispute on facts and figures on development with Peel Holdings has been very publicly played out in local media, this need to be sorted out and clear and precise numbers of houses made available. It is unacceptable to have the two sides taking different stances and giving widely differing views and figures, the Council must come to a clear understanding of what housing will be available so that this can be included in the Plan and presented credibly to the Government.*Green Belt is vitally important, not just because it makes the Wirral a beautiful place with unique villages, but also because of the historical and archaeological importance of all of these areas; once it is used for development it is lost and the face of our landscape is destroyed forever. We need to preserve it for the population’s wellbeing; if Green Belt is used for housing it will not just affect the look of the Wirral and its wildlife, it will affect the viability of our farms. In my own area we have a tenanted farm which has been proposed as having land suitable for development. This farm has been worked by the same family for a considerable time; The current farmer has worked very hard to make it viable and to improve methods to always meet current farming trends and standards. If pieces of land are taken and given over to housing then the farm loses that viability and can’t be sustained, we will lose a food source and will then need to bring in foodstuffs from outside of the area. This is in complete opposition to the current thinking in terms of reducing food miles and being ecological and it will make us more dependent on the vagaries of monopoly retailers, thus losing our choice to buy local, Importantly the farmer also loses his livelihood. I do not believe that using Green Belt would serve the population’s needs for housing; being built in these areas would serve mainly to provide housing options in the higher price ranges and not the affordable housing needed for people on limited incomes or those trying to get onto the property ladder. The road infrastructure in these areas is limited and would lead to unmanageable congestion on already overly busy roads e.g. Clatterbridge Road, Arrowe Road. Schools, Health Centres and other essential local services would not be able to cope with such an influx of population. Indeed the only people likely to benefit would be the mercenary property developers (who have no scruples, no consideration or understanding of the locality and who I know are already lining up and ready to move in) and of course the Council who would benefit from the higher council tax bands and payments from the developers. I feel very strongly that the Green Belt must be preserved for the benefit and wellbeing of future generations. I hope that I have presented my opposition to the proposed Local Plan and that as a resident I will be listened to by the people who have been voted to represent my views and that you will do everything to clarify and meet Wirral’s housing needs with the Government and ONS by utilising houses and land already available and without using any of the Green Belt.</p>
DOR00340	<p>ITPAS as both an independent body and member group of the Wirral Green Space Alliance (WGSA) endorses the Response to the Wirral Development Options Review Consultation produced on our behalf by CPRE. We extend our offer and wish to partake in the future redirection of the Wirral Local Plan production and we will be urging both local and national politicians to address this situation openly and to facilitate a robust and acceptable outcome that will be appreciated by both current and future generations. Please find attached the ITPAS Consultation Response which, whilst it addresses the Wirral-wide issues, is naturally targeted at the Area and Sites we know best and which we are charged to protect and enhance by our Members and other local residents, who have in great numbers expressed their support for our position (see the Petition Sheets in the attached document completed over a two-week period in an ad hoc process - 804 eligible entries). Whilst our Response is critical, it is well meaning and represents what we believe to be the self-evident truth. ITPAS hopes that it is well received and helpful towards the common aim of reaching the right result.</p> <ul style="list-style-type: none"> • No Government has determined how many homes are to be built on Wirral; all figures stem from Wirral Borough Council's (WBC's) own projections and those of Consultants who are from out-of-area with all listed Company Directors being London-based. • Successive Governments (Labour and Conservative) have chased Wirral Borough Council to perform their legal duty to produce a proper 'Local Plan', updated every 5 years. • WBC have successively failed to do this since the 2000 Plan and are now reportedly one of just three councils in the whole of England to be so far behind. • The current Government has said that WBC's excuses are not reasonable and that their task should be simple as Wirral "is not an area of high housing pressure" but one where over 80% of house moves involve Wirral residents relocating within Wirral. • Parliament decided two years ago that failing Councils may have to have outside help if they could not show improvement. In WBC's case, they were informed that this might take the form of direction from the 'Liverpool City Region' of 6 Boroughs (LCR). • Not wanting to lose control, WBC magically says it'll now take two months not two years. It beggars belief that a proper job could suddenly be done, and the latest supporting graphic of threatened Green Belt sites clearly shows this to be the case • Wirral's Labour Council had accepted without complaint or action their Consultant's 2016 Report conclusion that some Green Belt Land would have to be released for Housing. They continued to accept this despite the arguments forwarded by Groups such as ITPAS, the Wirral Society, CPRE (Campaign for Protection of Rural England), Stop Hoylake Golf Resort Action Group and others which held that a NIL release

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	<p>scenario was possible. The Council only became so-called 'defenders of Green Belt' once the Government called their bluff and Wirral's angered residents started complaining. • WBC's own exaggerated 'Objectively Assessed Housing Need', which has led to the misconception that it cannot be met without some release of Green Belt, stems directly from a wholly unrealistic projection of future economic and population growth, and displays a staggering lack of recognition of Local Knowledge and historic trends. • 'Boom Town' visions are in stark contrast to continued decline, especially in Birkenhead, Wallasey, etc. Recovery from Recession has been assumed to continue forever upwards and worse, to the resulting inflated figures has been added an upward-only contingency. • Analysis of WBC's figures shows glaring omissions, errors and admitted failure to take account of higher densities of modern development which require a smaller land-take and can provide more homes without Green Belt being released for a generation at least. • Where is development most desperately needed on Wirral? Surely, it's in the run-down and declining parts of Birkenhead, Wallasey and New Ferry, the last of which should have benefitted from a release of funds from WBC's £10m Disaster Fund. None so far. • Realistic 'Housing Demand' would not require release of Wirral's Green Belt. True, 'Brownfield Sites' alone cannot meet demand but with the addition of normal factors redevelopment, addressing Wirral's 6,000 unoccupied properties and vast number of unused planning Consents, plus bringing forward more than just 1,100 of the 13,500 dwellings given Outline Planning Approval at 'Wirral Waters' - demand could be met. • One has to wonder whether the Council knows what it is doing, how to deliver a proper Local Plan. It has started the process and failed to deliver one and "meet deadlines at least six times since 2004" (Secretary of State, C&LG). • Its production and maintenance of a statutory 'Brownfield Site Register' was not kept up-to-date and its rushed recent process is seriously flawed in that it contains many errors and significant omissions, resulting in a considerable understating of available Brownfield Sites (Previously Developed Sites, disused and vacant). • One example: Throughout the ITPAS Area (Irby, Thurstaston, Pensby, Thingwall and part of Barnston), the Council's Consultants identified just ONE Brownfield Site - "disused school on Fishers Lane, Pensby". When ITPAS pointed out that this was in fact an active Children's Centre, which had recently received Council investment exceeding £100k (to address part of the "not-fit-for-purpose Children's Services" (OFSTED)), the Council omitted this solitary entry but refused to consider a list of possible sites ITPAS had proposed, saying they might be reviewed next time (in 15 years?). Such an approach characterised the Council's response to its (box-ticking?) Brownfield Site Consultation. • In April, ITPAS received a response letter from the Council saying it could only include 1,100 of the 13,500 homes planned at 'Wirral Waters' (about which the Council must have clearly appreciated the general format and location in their granting of an Outline Consent) because it needed a detailed Planning Application. This is totally wrong and shows either a determination to drive through a flawed approach or a lack of in-depth knowledge of the Local Plan process, since during 2017 the Court of Appeal upheld the earlier High Court Ruling (which in turn upheld the Secretary of State's decision to follow Inspector's advice) that such detail and certainty were NOT necessary; and the: "possible", not even "probable", developments should be included against 'Housing Need' Failure to follow this Ruling alone has unnecessarily and wrongly disbarred over 5,000 possible new homes (planned for deprived and waterfront areas of Wirral). Peel Holdings (the 'Wirral Waters' Developer) has now issued an open letter to the Council Leader expressing disappointment at his "misleading and inaccurate information given to the Public and concluded, "we ask that you stop this campaign of misinformation; be honest with the people of Wirral and correct the misleading information you are distributing." The three scenarios Peel Holdings have reaffirmed for 'Wirral Waters' ALL considerably exceed' the number the Council is using. Why? • Will the Council Leader (LCR's Head of Development!!), abandon his own figures or his costly vanity Golf Resort development proposed in Green Belt (with its declining Sport but attractive (financially) luxury homes) and adopt a 'Brownfield First' policy, or will he simply ride in on a White Charger claiming he's saved all but a few.</p> <p>No Government has determined how many homes are to be built by Councils since Labour's Housing Targets were abolished. All Wirral's figures stem from the Office of National Statistics (ONS, a non-ministerial department, independent of Government, reporting directly to the UK Parliament). It is the ONS who have published revised figures recently, which are very helpful to the case against release of Green Belt and should prompt a change in our Council's course. The Council Leader's latest contention, that his pressure brought this about, is both misleading and plain nonsense, borne of trying to 'get off the hook'? Wirral Borough Council's (WBC's) own projections of Growth (of population and local economy) and those of their Consultants, together with ONS figures were/are applied to a Standard Formula (agreed by Parliament for all councils). There is wide acceptance that WBC's Growth Predictions were/are exaggerated, a contention supported by the latest published data. There is flexibility around the methodology of arriving at an 'Objectively Assessed Housing Need' (OAN) and Councils are urged by Government to challenge the 'formula' results in order that local and 'Exceptional Circumstances' may be taken into account. WBC has NOT challenged Wirral's results in any meaningful way nor taken up the opportunities offered to discuss and develop the standard methodology or the past resultant figures with the Centre.</p> <p>WBC's past and current approach has led to widespread concern of a determination to release Green Belt to show some development is occurring and reap a financial benefit. This concern was heightened by the WBC Officer Presentations at recent Public Meetings and suggestions since the much lower ONS figures were released that some Green Belt will STILL be released. WHY? In no particular order, there follow TEN points which fuel that concern. ITPAS would be pleased to see these points and others addressed and to witness Council actions mirroring its statements, including their being "Defenders of Wirral's Green Belt", determined to AVOID release of Green Belt land, transparently applying an approach which is aimed at that very conclusion and one which adopts a 'Brownfield First' policy based on a rigorous exercise to maximise its Brownfield Site Register and its development potential, including through applying appropriately higher densities of modern development than previously assumed (needing a lower land take).</p> <ol style="list-style-type: none"> 1. Wirral's strategy over various policy introductions (e.g. Parking Charges) appears to be: overstate the case, draw back, claim credit but implement the measure to some degree. 2. There is a growing track record of allowing Green Belt development when Brownfield options exist. e.g. Saughall Massie Fire Station, where mass protests and the presence of important archaeology were reportedly ignored. 3. WBC's Consultant's Main 2016 Report makes it clear that the Council had provided the Growth Assumptions (proved to be exaggerated) to put into the Standard Formula-based Local Plan

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	<p>system?</p> <ol style="list-style-type: none"> 4. Options for using inherent flexibility and arguing modification of the scale of Housing Need, though encouraged by national policy and the Secretary of State, had NOT been taken up meaningfully. 'Exceptional Circumstances' and historic Local Factors had NOT been pushed. 5. Errors pointed out during WBC's Brownfield Register Consultation process have led to reductions of availability but few, if any, additions, with the Officer statement that those identified as additional would be reviewed/appraised next time ... i.e. in 15+ years? 6. Were the Council determined to protect Green Belt (as now claimed), why did it keep quiet for 2 years about its Consultants' conclusion in 2016 that Release of Green Belt land was inevitable? Surely, the Consultants would have been required to find circumstances where this was NOT inevitable, arguing a more reasonable, lower Growth Rate. NO such action! 7. The Council continued to argue its case (of inevitable and "enforced" release of Green Belt) even when there was updated data available (before the latest reductions) showing that their Growth assumptions were far too high, especially as the Local Plan process is required to keep up-to-date with relevant input figures. It did not keep up-to-date. WHY? 8. Notwithstanding natural caution over developers' statements, Wirral Council has for many years worked alongside Peel Holdings on 'Wirral Waters', whose estimates of the scale of residential and other development have kept remarkably consistent. It is thus difficult to appreciate why just 1,100 new homes rather than Peel's 6,450 commitment have been included within WBC's Draft Local Plan for the FULL 15-year span and NONE at all during the first 5-Year Period (where more certainty of deliverability of Housing Need is required). Presumably, the Council was clear that proposals were "reasonable and demonstrable" when it granted Peel Holdings Outline Planning Approval for 13,500 new homes; and especially so as the WBC's own Presentation at Public Meetings confirmed that the First Phase Projects were now all "fully viable" (owing to the £6m infrastructure funding from Government and other beneficial status and measures) and deliverable within the first 5-Year Period. 9. The response to our and others' enquiries (why only 1,100 'Wirral Waters' homes were in WBC's Brownfield Site capacity figures) was that detailed Planning Consent is necessary before schemes can be included. This is fundamentally incorrect and runs counter to the 2017 Appeal Court Ruling which made it clear to Councils, developers and others that developments only need to be "reasonably possible", not even "probable" and definitely not "certain" or of proven deliverability. Why was this Ruling not applied as it would have significantly tipped the balance towards NIL release of Green Belt? 10. ITPAS had provided the Council with its own detailed appraisal of ALL Green Belt Sites within its Area (Irby, Thurstaston, Pensby, Thingwall, parts of Greasby, Barnston, Heswall) , using Criteria for exclusion from consideration publically consulted upon by WBC and used in their Consultants' own Appraisals, plus the 5 Principles of Green Belt and other key factors in WBC publications. ITPAS's assessments (representing over 600 residents) and WBC's own Criteria for exclusion of Sites were almost completely ignored in the rushed and flawed shortlisting of 48 Green Belt Sites. WHY? Detailed response on behalf of ITPAS with Petition Sheets - 804 eligible entries and 8 appendices including Mathematical and Planning Consultant reports. Summary of Main points. Disappointed and very concerned that the Process's many shortcomings and flawed conclusions to date run counter to the Aims of the Society and, without a significant change in direction and approach, appear certain to result in the release of Green Belt unnecessarily and to diminish and degrade the character of the Area and Wirral in general, and adversely affect the well-being and pleasure of its Residents and Visitors. Short timescale as a result of the Council's failure over many years to produce a legally-required Local Plan and the Government's loss of patience has led to an overly lengthy and inappropriate shortlist of possible Sites and the omission of others which would have been more suitable. The Core Strategy (2013) concluded (Policy CS3) that it would not currently be appropriate to provide for any additional development within the Green Belt in the period to 2028". What has changed? The Council's own projections of economic growth and the independent national statistics around projected population and household figures for the Wirral have all been significantly downgraded. <p>The government allegedly told Council that they 'must' build 800 homes per annum or 12,000 in total over the period 2018 to 2033. However it is clear that the council has considerable room for manoeuvre. DHCLG minister, said "We're not dictating targets from on high ... these 3 [process] steps will provide a starting point, [for] an honest appraisal of how many homes an area needs. But it should not be taken as a hard and fast target...How to meet demand ...where to develop, where NOT to develop, what to develop...and so on, remains a decision for local authorities and local communities." Secretary of State (DHCLG) in his letter to the Leader on 23rd March 2018 (in which he rejects the Leader's reasons for delay and further delay and advised that his Department was considering 'Intervention') also made it clear that Wirral "is not an area of high housing pressure." Why then are so many new homes being proposed? Council continues the mantra that it is being forced to deliver 12,000 homes and to release swathes of Green Belt by insistence upon use of the current (draft) Standard Methodology for objectively assessing Housing Need. There is flexibility around the methodology and Councils are urged by Government to challenge the 'formula' results in order that local and 'Exceptional Circumstances' may be taken into account. Others have done this but Wirral Council has chosen NOT to challenge Wirral's formula-based results in any meaningful way nor taken up the opportunities offered to discuss and develop the Standard Methodology or the past resultant figures with the Department (DHCLG). Concern about determination to release Green Belt to reap a financial benefit through high Council Tax receipts from the development of luxury housing in Green Belt and 'New Homes Bonus' payments. Appendix 3 seeks to correct various Council statements, gives grounds for a change of approach by Wirral Council, and lists 10 points which fuel concern that the Council is determined to release Green Belt and to stick to its extremely high OAHN (Objectively Assessed Housing Need) justified not by robust and historic trend data but by an unchallenged adherence to the Standard Methodology. Wirral Council's development performance of recent years has been relatively poor, well below the target they are still setting themselves, although historic levels may well be close to those actually required. Unsatisfied need is mainly for smaller dwellings for people who wish to get onto the 'Housing Ladder' or move to a better home and for those, generally older folk, looking to 'downsize'. Luxury 4-Bed houses with large gardens in Green Belt (actually proposed by the Council) would suit precisely none of this main</p>

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	<p>demand. Waterfront and Dockland apartments and townhouses, developments comprising one- and two-bed houses with small gardens, together with some of the thousands of Empty Homes 'brought back into use' would ideally suit and satisfy this latent market.</p> <p>From New Homes Bonus information (awaiting corroboration) it would appear there is: (i) a large drop in annual Net Additions of Homes created over last 3 years: down 41% in 16/17 from 14/15 (Oct base);(ii) a large drop in annual Empty Homes Back into Use over last 2 years: down 60% in 16/17 from 15/16 (Oct base);(iii) a large drop in annual Affordable Homes Delivered over last 3 years: down 75% in 16/17 from 14/15 (Oct base);(iv) a large drop in New Homes Bonus received over last 3 years: £3.2m, £2.3m, £1.5m where falling dwelling completions play a large part in the loss of income and possible consequential need for Service cuts. The Council's 'Housing Need' figure and their contention that substantial Green Belt has to be released for development are flawed and unfounded. Wirral's 'Housing Need' should be much lower and that, for all reasonable scenarios, NIL Green Belt land has to be released and Boundaries should remain permanent as they are designed to be. Sites shortlisted are clearly inappropriate and more suitable Sites have been identified and are available - all this because the Council has failed to do a thorough Sites Appraisal with weighted and excluding criteria and proper scoring, or to follow closely its Consultants' Site Appraisals and the 'Five Purposes of Green Belt'. Appendix 4 clearly shows the disproportionate extent of Green Belt put 'at risk' when compared with the average of all 50 other LA Local Plans delivered in the past eight years. It refutes any suggestion that other councils with high housing pressure and little Brownfield Site resource, who have consequently had to release some of their Green Belt, set any kind of a norm that Wirral can follow by citing precedent and inevitability. Wirral has vast, untapped resources to avoid such an occurrence and should be aiming at and delivering a robust Local Plan with very little or NIL Release of Green Belt. LINK for ONS statistics and tables of Green Belt areas and change in England show a small (0.5%) decline in Green Belt as a proportion of the land area of England over the last 8 years of intense Local Plan activity despite many councils experiencing high housing pressure (as opposed to Wirral's "low housing pressure"); and (ii) Average Release of Green Belt per new Local Plan over the last 8 years has been just 0.0121%. The area of Green Belt land on Wirral shortlisted for possible Release is 4,900 acres (1,983Ha). As a proportion of Green Belt land across England, this equates to 0.122% or over TEN TIMES the average of other local authorities. This is simply not justifiable and is causing widespread and unnecessary concern and blight. It is also adversely affecting the Housing Market as people will not buy homes when there is such uncertainty. Wirral "is not an area of high housing pressure, has a vastly greater area of Brownfield land and buildings for conversion than do most other local authorities. Green Belt area lost by other LAs includes the correction and other errors on maps; whereas, Wirral's loss of Green Belt area arising from such corrections would be in addition to the 4,900 acres 'at risk'. National Planning Policy Framework Chapter 11 is cited. It would appear from projected Site Capacities and from the Council's proposed 'Hoylake Golf Resort Project' that these requirements have not been optimally followed, which would tend to exaggerate the required 'land take' for a given OAHN.</p> <p>Wirral already carries more than its fair share of housing for adjacent local authorities in that 40% of its working residents commute off the Peninsula. A more sustainable model would see neighbouring authorities providing housing for a higher proportion of their own workforce. Council appears to have accepted without argument a blanket "NO" from its neighbours. This needs to be revisited. Any growth in employment would be taken up by those currently commuting off Wirral and seeking a shorter working day and uplift in the quality of life. Likely that a significant proportion of any economic upturn would not lead to any pressure for new dwellings as those people would already have homes on Wirral. A dampener was put on the prospects for economic growth at the Public Consultation/Local Plan Presentation at Pensby High School when it was stated that Wirral was short of suitable sites for commercial/industrial activity and that new opportunities for enterprise and employment would be centred on existing companies and their present sites and on small-scale start-ups and personal businesses. There is a seemingly unjustified vagueness and a reluctance to include much of Wirral Water's vast potential in the 15-year period of the emerging Local Plan. The 1,100 units included by the Council "is not a number recognised" by Peel. This is unacceptable and represents a major shift by the Council which directly threatens Green Belt quite unnecessarily, and holds the prospect of further years of continued decline in areas such as Birkenhead and Wallasey. The Council would be fully justified taking and capable of defending a decision to include, if not the 6,450 unit figure, then the 2,900 lower scenario. 'Wirral Waters' was and should remain the cornerstone of the Council's strategy for the essential and long overdue regeneration of the most deprived and deserving areas of East Wirral. Surprising and concerning that the Council has been silent regarding the 'Lindblom Ruling' of the Appeal Court (2017) which made it clear to that developments only need to be "reasonably possible", not even "probable" and definitely not "certain" or of proven deliverability to be included with confidence in 5-year housing supplies. This alone could justify inclusion of the 6,450 figure. Permanence' is a fundamental and deliberate characteristic of Green Belt; and 'Purpose 5' is specifically designed "to assist in urban regeneration, by encouraging the recycling of derelict and other urban land." It is not acceptable for Officers to point to the relative difficulty of such development to justify Release of Green Belt. A need to produce a Local Plan is specifically excluded from being an 'exceptional circumstance' per se. Two letters on the Brownfield Register and the Review of land in Green Belt are submitted as Appendix 5. The first calls for restatement of a 'Brownfield First' policy. The Brownfield Register is considered deficient and misrepresentative. Capacity should be increased by including some excluded sites; sites with capacity below 5 units and area below 0.25Ha; appropriate sites identified by Consultation Responders; highest applicable standard densities (table of sites provided with reference to previous submissions). Planning consultants indicate this clearly fails to give full weight to the brownfield development at Wirral Waters of some 6,450-13,000 new units. The second addresses at some length the methodology and effectiveness of the Review Process. Green Belt Site Selection & Appraisal Process by which the 50 Sites were shortlisted was not thorough, clearly rushed and had a flawed methodology. Not taken sufficient account of Consultants' Conclusions and 'Notes' on features and necessary protection issues for individual Sites are critically deficient or absent. It's not clear that the system for selection and exclusion of Sites had included appropriate and necessary weighting of Criteria, absolute exclusion criteria and/or proper scoring. This must cast doubt upon the selection results as being fully objective and valid. It is disturbing to see Sites included which conflict seriously with more than one of the Five Purposes of Green Belt, and others compromised by features and creatures due lawful and/or special protection status, and even</p>

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	<p>some Sites which previous Council statements and published documents have argued should be preserved for their special contribution.</p> <p>Hastily drawn Wirral Map has been the blunt tool used to produce the majority of the Shortlist. It misrepresents the nature of permitted "limited infill", confuses the technical term 'Settlement'. It indicates likely insufficiency of detailed option appraisals, including of different approaches, such as creation of a new village/community or expansion of an existing one. Many individual Sites have been amalgamated into much larger Sites or Parcels. This could make it easier to dismiss the significance of a component part of a large site, especially if there are no 'absolute exclusion criteria'. Smaller Sites tend to have weak 'enclosure' and 'boundaries'. Use of small scale plans should not obscure the real nature of the size of these larger sites. One example is Site SP062 - West of Barnston Village. This used to comprise smaller Sites ref: 884, 877, 1946, 1958, 1981 and another. As separate sites, all had 'weak boundaries', no 'enclosure' and showed sprawl into open countryside. And they all had a good case for exclusion from listing under the Purposes of Green Belt. This Site should be disregarded as having any effective 'enclosure' as the reality on the ground is that, viewed from anywhere close to its perimeter, views and impressions are of open countryside. Other examples including Site SP060 - South of Thingwall Road, Irby with smaller site ref: 892, 895, 1546, 1932, 1979 and another had 'weak boundaries' and no real 'enclosure', and individually showed clear sprawl into open agricultural land. This large Site, shown at a scale of 1:7,500, can appear 'enclosed' but, with distances across of 1.25km and 1km, together with its particular topography, the impression is of open countryside with views over distant rooftops all the way to Liverpool Cathedral. Of many factors demonstrating the necessity for exclusion and preservation of this Site (listed later) the most obvious is the direct conflict with Green Belt Purpose 2. Development here would merge the very different Irby, Pensby and Thingwall and provide an urban sprawl from Heswall through Pensby, Thingwall and part of Barnston to Irby and on to Greasby. The physical and socio-economic characteristics of Irby and Pensby are quite different and each community is aware and proud of its own distinct identity (descriptions and photographs provided).</p> <p>Wirral SHLAA 2016 confirmed that all the Shortlisted Sites are 'Category 3' - "considered not currently developable and subject to constraints which may only make them deliverable within an 11-15 year period." Nothing has changed, with the exception that Growth and 'Housing Need' projections have gone down significantly and are predicted to decline further ('Brexit' ++), there can be no reasonable argument for amending this categorisation, except to change the period to beyond the 15-year mark. Own Green Belt Site Assessment included in Appendix 6 should be read alongside our site-specific comments. Detailed strong objections submitted in relation to Sites SP010A - East of Rigby Drive, SP019B - East of Glenwood Drive, SP059B - Land at 41 Thurstaston Road, SP059C - Land at 59 Thurstaston Road, SP059D - Land at 61 Thurstaston Road, SP059E - Rear of Irby Hall, SP060 - South of Thingwall Road, SP061 - North of Gills Lane, SP062 - West of Barnston Village on grounds including conflicts with Purposes of Green Belt, ancient woodland and biodiversity sensitive features, WeBs Risk, public amenity value, high quality agricultural land, views, high voltage cables, flood risk, historic features, setting and site of archaeological importance, right of way.</p> <p>Planning consultants' report shows that in accordance to the National Planning Policy Framework, 2018 the employment and housing requirement, can be easily met from the allocation and development of brownfield sites in the former industrial areas, promoting regeneration in the more deprived communities, and delivering needed jobs and homes for the people of Wirral in the future. Wirral Council has no exceptional circumstance necessitating the loss of a single square inch of Green Belt land for future development needs, and should now publicly re-affirm the existing, tested Green Belt boundaries. Household projection figures that underpin the housing requirement have been reduced by almost half during the consultation period and further revisions to the way housing need is calculated by Government are expected in December 2018, it is recommended that Wirral Council revisits the requirement figures and site allocations in entirety. The local societies are concerned that Wirral Council progresses the Local Plan in the spirit of the updated National Planning Policy Framework, 2018, recent court ruling by Judge Lindblom, letter from Peel, and updated Office of National Statistics 2016-based household projection.</p> <p>Another approach should be taken by Wirral Council, which for whatever reason has adopted the wrong course. Government must be made aware that the people of Wirral, even now after having been let down, wish this Process to be undertaken and completed locally and with adequate time afforded to do the job properly in contrast to the ongoing rush to stave off outside 'Intervention'. Clear wish and instruction of the people of Wirral is for a Local Plan to be brought forward which releases NIL Green Belt.</p> <p>The Green Belt currently provides Wirral residents (and visitors) with valuable open space and attractive landscapes that promote healthy communities and increase well-being as well as providing valuable habitats for wildlife. The value of this Green Belt land should not be under-stated and once gone it will be lost forever. The Green Belt should be protected until there are no other options. The other options have not been appropriately considered and/or are being understated. Please reconsider.</p>

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DOR00341	<p>I object to the inclusion as possible housing sites of SHLAA 2024 Bromborough Civic Centre and Library and 2025 Allport Lane Car Park.</p> <p>I have lived in Bromborough for 36 years and as a family we regularly use both. Bromborough village shopping centre is still a thriving centre, despite the Croft Retail Park. It has low vacancy rates and good public transport links. There is strong local support as evidenced in Bromborough Village Community Association, which cares for planters, does the Christmas lights and organises an annual festival. There is both convenience and comparison shopping as well as services. Muffs butchers attract customers from outside Bromborough. Bromborough has a significant elderly population, many without cars, and the local buses are well-used.</p> <p>SHLAA2025 All this real and community activity would be destroyed if there was not good car parking adjacent to the centre. The car park is nearly full Monday-Saturday, as is the small Co-op car park. There is no room elsewhere in the centre to park that number of cars. Even now, when events such as a sale at on in the Civic Centre, cars are parked in surrounding roads. The car park cannot be made smaller and still fulfil the need. Unless a two-storey car park is to be built on half of it, no land can be released for housing.</p> <p>SHLAA2024 Bromborough Civic Centre and library: the Civic Centre is in use Monday-Saturday, frequently for large parts of the day. People coming to activities there frequently combine that with shopping or visiting one of the refreshment businesses. It therefore brings people in to the retail centre. Its large hall is by far the largest public space available in the area - the various church halls are much smaller. The church halls, and those in Eastham, are already quite busy with activities, and could not take many of the existing Civic Hall activities, even if the halls were big enough. The library has suffered from reduced hours for the last few years, but is still a valued resource, and is considerably bigger than Eastham library. Travelling from Bromborough to Eastham or Bebington centres, to another library, is not easy or cheap for those without cars. Closure of this centre would be bad for many people who currently use it, and reduce custom to the retail centre. If the building is life-expired, then a two-storey replacement might be possible, using half the land and releasing the rest for a small number of homes. Otherwise, it is essential that the Civic Centre remains open.</p> <p>Loss of either the Civic Centre or the car park would be likely to reduce Bromborough village to the same state as New Ferry shopping centre.</p> <p>Response to Development Options Review</p> <p>POLICY</p> <ol style="list-style-type: none"> 1. The NPPF states that planning policies must take a “strategic approach to maintaining and enhancing networks of habitats” [171, 170d,174a,174b]. These networks have not yet been taken into account in the Development Options Review, and only the Core Biodiversity Areas map is included in the public documents. The most important networks have been identified in the Liverpool City Region Ecological study carried out in 2015 by MEAS, and these maps must be included in the Local Plan and used to inform decisions. The networks and corridors include the M53, railways, western coastal strip and the central Wirral Green Belt area, which stretches from the Cheshire West and Chester boundary up to the north Wirral coastal plain. It is vital that these networks and corridors are recognised in the Local Plan process, and protected from development that would obstruct wildlife movement. 2. Green Belt is not a wildlife designation, but it does act to add protection to wildlife-rich sites and wildlife movement corridors that happen to lie within it. Wirral Wildlife therefore supports the retention of a Green Belt corridor through central Wirral, and opposes the reduction in the extent of this corridor, including by any extensive infill in existing villages e.g. Landican. The M53 motorway itself can act as corridor (for wildlife moving along its verges), but also as a barrier preventing wildlife movement across it e.g. brown hares are found west of it, but not to the east of the motorway, despite various bridges across. Losing the farmland corridor east of the M53 would therefore have consequences for wildlife movement, and we oppose the loss of this corridor as a general principle. The same principle applies to the western coastal corridor, which in addition to the need to protect the Dee Estuary SSSI/SPA/Ramsar site, is also needed for wildlife movement up the western coast. We oppose the loss of this western corridor. 3. NPPF 180 refers the need to “identify and protect tranquil areas” from noise pollution and to “limit light pollution”. Wirral already has very few areas that are not impacted by traffic noise and light pollution, with effects on wildlife, particularly invertebrates, owls, bats and other nocturnal wildlife. The central green corridor and western coastal corridor offer some of the best tranquil areas, and must be retained as such. 4. One matter that concerns us on reading the NPPF is the lack of reference to food supply. As a consequence of global climate change, our weather has become even more variable, and droughts like this summer are likely to become more frequent. The weather this year has led to drops in yield of a quarter for wheat, and half for potatoes and carrots. Such weather conditions have also affected our European neighbours, from whom we import much of our food, especially vegetables and fruit. For reasons of health and climate impacts [148,149], it is necessary that as a nation we move to a more vegetable-rich diet. Vegetables and fruit are best grown close to areas of consumption, to maintain freshness and food value. The NPPF refers to the need to retain the “best and most versatile agricultural land” [170], defined in the Glossary as grades 1,2 and 3a. Wirral Wildlife supports this, and therefore objects to the loss of any farmland of this quality. 5. Wirral Wildlife supports the general principle of redeveloping brownfield land first, and concentrating development in the existing urban areas [117-119], as being most sustainable in terms of transport, facilities, infrastructure, etc., and also least damaging to wildlife. However, there are a small minority of brownfield sites which have, while unused, developed environmental and/or nature conservation value. Ecological surveys are needed on brownfield sites and any found to have high value should be preserved from development, or require full mitigation from the development, in order to secure biodiversity net gain as set out in the NPPF [32,118a,170d,174b,175d]

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	<p>It is obvious that the more housing can be brought forward under the Wirral Waters scheme, the less need there will be to build on greenfield, especially Green Belt, sites. NPPF 137 states that the plan must make "as much use as possible of suitable brownfield sites and under-utilised land". NPPF 59 states that "it is important...that land with permission is developed without unnecessary delay". We recognise that there are problems of soil contamination and poor residential infrastructure in much of the dock estate [81c]. Some open areas (currently in areas zoned for industry not housing) support ground-breeding birds, in populations which are likely to be considered of county importance; these would need provision elsewhere. However, we believe that pressure should be put on Peel Holdings to bring forward more housing as soon as possible, rather than waiting to see if economic conditions improve and possibly finding they do not. It may be within the powers of the Secretary of State to influence this [74]. It is within the power of national government to recognise that the "polluter pays" principle cannot be applied in these cases, as the polluting firms have long since ceased to exist. If this land is to be brought back into use, as an alternative to building on food-producing and other greenfield sites, then society should help with the clean-up. This has been the case with "derelict" land since the 1970s, when central government funds helped the reclamation of colliery shale and chemical waste in south Lancashire and other mining areas. Such funds have been needed in every decade since, and are still needed to get over the obstacle of cleaning up land, before it can be re-used.</p> <p>6. It is the aim of Wirral Wildlife to protect all wildlife in Wirral, not only that on designated sites. This is in line with NPPF 170, 171, 174-177. We therefore oppose any development on, or having a detrimental effect on, wildlife-rich areas, including Natura 2000 sites (Habitat sites in the NPPF), SSSIs, Local Wildlife Sites, species-rich hedges, waterways and areas used by wide-ranging species such as bats, newts and owls [175]. The Mitigation Hierarchy must be applied [175a]: "if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused." Where such wildlife-rich areas are within the Green Belt parcels under consideration, we oppose development - see detailed assessment of each parcel below. While Green Belt is not a wildlife protection designation, it does add an extra layer of protection to wildlife-rich sites, and the Green Belt therefore has many wildlife-rich areas. This is especially true in Wirral, where the effects of geology, geomorphology and history mean we have many wildlife-rich areas: 12 SSSIs and over 70 Local Wildlife Sites [170a,171,174a,174b]. Wirral Wildlife therefore opposes the release of Green Belt land except in the direst necessity, and considers the originally-proposed release of half of the areas under investigation as unacceptable. It is the responsibility of the present generation to protect and manage the land for future generations [7-11], and to ensure the retention of "Natural Capital", and of "ecosystem services" such as pollination [170-177]. We consider any compensatory improvements to the remaining Green Belt would be very difficult to achieve in Wirral, constrained as it is by water, and with most of the Green Belt in private ownership. There are already high numbers of wildlife-rich sites (see above) but around two-thirds are in private ownership. The planning system would not be able to force more environmentally-friendly management on such private land, and with the current uncertainties on farm subsidies it cannot be argued that central government could ensure this either. There is already a good network of Rights of Way, well used for walking and cycling. While some extra funds to maintain RoW and publically-owned wildlife sites would be welcome, this would in no way compensate for the loss of large areas of Green Belt land. There is no way to bring significant areas of new food-producing land into production to replace any lost to development (small areas of neglected farmland exist on the north Wirral coastal plain, but they are again in private hands and cannot be forced into production).</p> <p>If high-value wildlife areas are damaged by development, then net biodiversity gain would be difficult or impossible to achieve unless very large tracts of land are set aside for biodiversity off-setting. The requirement for such large areas would make the whole development economically unviable. This applies to measurable indirect impacts as well as direct impacts. Significant buffering habitats would be required to mitigate against indirect habitats.</p> <p>7. As Wirral Wildlife we are not able to bring professional judgement to the issue of numbers of houses required, but as a group of 9 local residents preparing this submission on behalf of Wirral Wildlife, we are well aware that historic house building levels have been well below the 800 originally proposed, and that these numbers are based on data that has now been re-evaluated by the Office of National Statistics. We await confirmation, but it seems that the ONS projection is now around 450 per year, which even with a reasonable uplift for hoped-for economic growth would not require more than 500 net houses per year. Recent history is that it is difficult to attract jobs to Wirral (c.f. Peel's difficulty in getting development at Wirral Waters), and that there is a lack of money in the local economy to rent/buy property. Wirral's population is stable or slowly decreasing, and contains well above the national average proportion of over-65s. The need for more housing therefore seems to be likely to be nearer 500 than 800 a year. One economic growth area in recent years has been tourism, driven by Wirral's coast and countryside. Building on a large section of that countryside would harm the tourism offer. Wirral already has over 50% of its land area as built development, a figure the projected building would increase to over 60%. If the tourism industry is to be supported, then this level of development is most undesirable, especially if it was located along the M53 corridor by which many tourists come into Wirral. Also, for the residents of Wirral, access to countryside is constrained by "water on three sides" and the presence of Liverpool, so it is vital to public health, especially for residents of the eastern side of Wirral, that there should be sufficient open space for recreation and physical activity. There is already a great health divide between the east and west sides, and the east side contains some of the poorest wards (on child poverty indicators) in England. Easy access to open land from the eastern developed area is therefore important. For these reasons, development should be spread between the two sides of Wirral, not concentrated on the east side. Under paragraph 11b of the NPPF there is provision for limiting the overall scale of development in a plan area. We therefore argue that Wirral does not have the capacity for the 800/year originally proposed, and it now seems Wirral does not need such amounts. We therefore submit that any Green Belt release should be phased to not occur until at least the last stage of the plan period (11-15 years), and when 90% of the available brownfield and urban sites have been built. This is in agreement with the provisions of the NPPF [137] for using brownfield land in preference and phasing of release of development areas [139]. Such phasing would allow the 5-yearly review to decide if the</p>

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	<p>numbers proposed are really necessary or achievable in the financial climate then obtaining.</p> <p>8. There is a need for a thorough review of infrastructure e.g. schools, health services, roads, to see where there are problems with services to such a large number of houses, which assumes an increase in Wirral's population. The impacts of any infrastructure works on wildlife and the environment must be added to that of the housing itself, and must not lead to increased or future demands for building on greenfield or Green Belt land to provide these [72,92,94].</p> <p>9. Cumulative effects of building on large areas of land around the Irby/Greasby/Thingwall/Frankby area need to be considered. The wildlife effects would include seriously increased visitor pressure on Thurstaston Common SSSI, and the LWS of Arrowe Park, Royden Park, Harrock Wood and Manor Farm Frankby, and introducing visitor pressure to Greasby Copse. Increased pressure on the SSSI would be particularly harmful. While these pressures can to some extent be countered by appropriate management, increased footfall is highly undesirable. To fund increased management it would be essential for developers to pay a significant levy, to be passed to the relevant landowners (e.g. National Trust and Wirral BC) to fund such management in perpetuity. We need to keep a large area of wildlife-friendly land in central Wirral, and to keep a wide wildlife-passable corridor into north Wirral. Building in this area should therefore be restricted in total numbers.</p> <p>10. Similar cumulative effects need to be considered for the corridor east of the M53, from the southern border of Wirral Borough up to Prenton. This is an important wildlife corridor. We need to keep a wide wildlife-passable corridor along the east side of the M53. Vastly increased housing here would bring increased visitor pressure to bear on Dibbinsdale SSSI, and the LWS of Storeton Woods, The Marfords and Prenton Dell. Increased pressure on the SSSI would be particularly harmful, so increased footfall is highly undesirable. To fund increased management it would be essential for developers to pay a significant levy, to be passed to the relevant landowners (e.g. Woodland Trust, National Grid and Wirral BC) to fund such management in perpetuity. Building in this area should therefore be restricted in total numbers.</p> <p>11. As local residents, we are well aware that Wirral needs large amounts of "affordable" housing (40% in several studies), and that historically, housing built on Green Belt has been mostly (73%) for full market prices if not luxury homes. We therefore submit that if any greenfield and especially Green Belt land is to be released, then the provisions of the NPPF chapter on "making effective use of land" be used [122,123, also 127]. Greenfield land is cheaper to develop than brownfield, and lies in the highest viability areas, so if any Greenbelt is to be released:- Minimum densities must be set at a high level. · - There must be a very high percentage of affordable homes, to make up the shortfall in such homes. · - Low densities must not be permitted. · - Affordable homes should remain affordable for the lifetime of the development.</p> <p>12. The NPPF says that "Government attaches great importance to the Green Belt" [133]. If any Green Belt land is to be released, then its development must meet all provisions of the NPPF, including:</p> <ul style="list-style-type: none"> • Minimum densities [122,123,127]. • Provision of good quality public open space [8,96], with management fully funded for the life of the development. There is good evidence of the benefits of open space to mental and physical health, indeed a study done by Mersey Forest calculated that every £1 spent on open space was worth £7 in savings to the NHS, industry etc. by improving health. There is some evidence that "naturalistic" open space is more beneficial than the standard mown-grass-and-lollipop-trees type. (ref "Urban Forestry for human Health and Well-being") • Development must meet the NPPF policies in securing improvement in biodiversity [8,32,72,118,170,174]. Much of Wirral's farmland is of relatively low intensity, and retains many Local Wildlife Sites, good hedge networks and other wildlife features, so that achieving net biodiversity gain during development would be difficult. Retaining LWS within development is not always an answer, as small isolated sites lose species over time ("island effect") unless they have large buffers, and very good connections to other sites or many stepping stones [170]. Indirect impacts must be considered when measuring net losses/gains of biodiversity. This is normally built into the Biodiversity Impact calculators which are available to developers and planners. • This would impact, for example, Harrock Wood, Irby, an ancient woodland. Sir John Lawson, in his review "Making Space for Nature" summed up the needs for securing a future for wildlife in this country as "more, bigger, better, joined". While the opportunity for more wildlife sites in Wirral is low, any wildlife-rich area affected by development, whether designated LWS/SSSI or not, needs to have an extensive buffer zone round it. We propose a width of at least 50m, to allow for a footpath for public enjoyment without increasing disturbance to the core area. We would also expect other measures such as bat-sensitive lighting, hedgehog-friendly fencing, water table protection and pollinator-friendly planting. Appropriate management must be funded for the life of the development. • Development should also contribute to better management of any wildlife-rich sites directly or indirectly affected, many of which are already taking considerable public access and cannot take more footfall without harm e.g. Thurstaston Common SSSI. This could be achieved via an infrastructure levy on all greenfield building and/or compensation for harm that cannot be avoided or mitigated during development [32, the hierarchy of avoid-mitigate-compensate applies]. · Wildlife corridors and stepping stones must be identified in the Local Plan, conserved, enhanced and joined up [170]. Gardens can make some contribution to this, but they are uncertain as much depends on the management done by the householder. Therefore protected open space must be supplied to avoid the risk of a corridor being broken by unsympathetic management e.g. fencing that prevents hedgehog movement. • Sustainable transport must be provided and encouraged, and car use discouraged, to reduce damage to air quality, impacts on climate change, noise etc. [102-111]. • Development must be suitable for coping with a changing climate and minimise the impacts of development on that climate. Therefore all development should be to zero-carbon homes,

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	<p>Passivhaus or similar standards, and conform to NPPF 127,131,148-154 including renewable energy generation.</p> <ul style="list-style-type: none"> • Water management [155-165] is a key consideration especially in flood-prone areas of the borough (e.g. north Wirral coastal plain, valleys such as Dibbinsdale and all areas at the foot of steep slopes). Effective SuDS will therefore be required in all developments, with provision for their retention and maintenance for the life of the development [165]. • Wirral is not currently part of the Mersey Forest and therefore only on the fringes of the Great Northern Forest proposals. The opportunity should be taken to involve Wirral in these initiatives [142] and increase our current low tree cover, as long as this is done without harming other valuable habitats, such as heathland and species-rich grassland. • Development must be designed to prevent pollution to air, water or land [170], and to reduce noise and light pollution to a minimum, as any Green Belt area is likely to be fairly clean, dark and quiet at present [180].13) The policy in the 2012 draft Local Plan Core Strategy concerning wildlife and geology needs some updating in the light of NPPF 2018, and we will be submitting proposed changes. The retention of Wirral's wildlife is essential, in its own right and for the sake of people. Internationally, wildlife (biodiversity) has declined seriously over the last few decades (ref study in Germany showing 75% decline in insect biomass over that time, and similar figures from Rothampsted long-running studies of moths and other insects in the UK). The decline has reached a point where there are direct effects on human food and health e.g. by lack of pollinators. There are also effects on mental and physical health of loss of open space and food-producing land (10 above). We therefore urge that every effort should be made to avoid building on greenfield land, whether of direct wildlife importance or not. Where there is important wildlife, it needs space, low levels of human and pet disturbance, appropriate management, and links to other sites to enable landscape-scale wildlife movement.14) The policy in the 2012 draft Local Plan Core Strategy concerning wildlife and geology needs some updating in the light of NPPF 2018, and we will be submitting proposed changes. The retention of Wirral's wildlife is essential, in its own right and for the sake of people. 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Great Crested Newts have been recorded in the last decade around the Three Lanes End hamlet. All ponds would have to be checked for them, and suitable terrestrial and aquatic habitat preserved/constructed. Development would need a Sustainable Drainage system to maintain existing pond water levels – when the estate to the south was built, the resultant drop in soil water table led to loss of a number of ponds. Wintering waders and gulls from the Dee Estuary and North Wirral Foreshore SSSI, SPA and Ramsar sites use this area at times for roosting and feeding. Further study is needed, but it may prove to be functionally-linked land, in which case built development would not be appropriate. Nesting birds also need study but may be significant. Greasby and Arrowe Brook would need buffer zones on both banks, at least 50m wide, to protect from pollution and disturbance. This is an important river corridor from central Wirral all the way to the Birket system, including Meols Meadows SSSI. Quality of housing</p> <p>SP002A – SP002C. No known wildlife concern</p> <p>SP003 – Saughall Massie Conservation Area. We note that zero housing is proposed. In the event of future building, Arrowe Brook would need buffer zones on both banks, at least 50m wide, to protect from pollution and disturbance. This is an important river corridor from central Wirral all the way to the Birket system, including Meols Meadows SSSI.</p> <p>SP004A,4B – North of Saughall Massie Conservation Area. We object to this area because Arrowe Brook would need a buffer zone, at least 50m wide, to protect from pollution and disturbance. This is an important river corridor from central Wirral all the way to the Birket system, including Meols Meadows SSSI. Sustainable Drainage would be essential. There are reports of wintering and breeding birds, which need further study. Most of the land is high quality agricultural land: the NPPF refers to the need to retain the "best and most versatile agricultural land"[170].</p> <p>SP005A East of Garden Hey Road, Saughall Massie: There are reports of wintering and breeding birds, which need further study.</p> <p>SP010 East of Rigby Drive, Greasby: Wirral Wildlife objects to building on this land because: • Bats are regularly reported round the area and adjacent housing, possibly part of the same population that is based in Arrowe Park: we do not know the roost sites. Bats would suffer loss of foraging land, disturbance from lighting, and possible loss of roost sites. This would have detrimental effects on the bat hotspot of Arrowe Park. Bats are legally protected species, and development that risks a significant impact on their population should be avoided. • Greasby Copse LWS would become a small isolated site, likely to lose its wildlife interest unless very carefully managed and buffered. Currently it has no public access, so any future access would increase disturbance to wildlife. • Other wildlife regularly reported from the land includes Barn Owl, Cuckoo, Kestrel and Common Toad, all of which are of conservation concern. (Section 41 species of the NERC Act 2006 and other relevant designations) • Development would affect the tributary to the Arrowe Brook on the east side. This is an important river corridor from central Wirral all the way to the Birket system, including Meols Meadows SSSI. • The land is high quality agricultural land: the NPPF refers to the need to retain the "best and most versatile agricultural land"[170]. The main farm (Green House Farm) is managed in a sustainable and environmentally-friendly way, currently licenced to sell unpasteurised milk, which entails farming to the highest standards. This is the only such dairy farm on Wirral. Destruction of this business would not be sustainable development. • There are good species-rich hedges, which would need to be preserved as full wildlife corridors. • Currently this is a relatively quiet and tranquil area, and should be retained as such (NPPF 170, 180).</p>

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	<p>Any development on this land would need: ●A 50m buffer to Greasby Copse and the adjacent ponds, to prevent demands for tree removal within falling-distance of houses and gardens, with provision for management of the buffer and the wood itself. ●Sustainable Drainage, to maintain existing soil water levels for the wood and ponds. A buffer at least 50m wide to the watercourse. ●Linking hedges or similar to provide wildlife corridors between the copse, watercourse, and the greenfield areas to the south and west. ●Bat foraging areas, and tight controls on lighting including switching off all lighting for parts of the night. ●Housing quality as above (policy point 14 above). Achieving all of these would require substantial parts of the parcel, and therefore development is much better directed elsewhere.</p> <p>SP013 West of Column Road, Caldy. Wirral Wildlife objects to building on parts of this land because: • Caldy Hill and Stapledon Woods are LWS, important for lowland heath, birds, insects and badgers. No development on them could be accepted. • The parcel and adjacent areas are important for badgers. While badger numbers nationally have been increasing, the Wirral population struggles to maintain its numbers, because of road deaths, habitat loss and illegal persecution. • Just across the A540 is the Caldy Wildlife Collection, a large private area of water where much wildfowl lives, and which has provided a site for the Black-tailed Godwits and other birds displaced from the “scrape” by Gilroy nature park, when this was drained in 2016. Nationally and sometimes internationally important numbers of Godwits now use the Collection ponds on migration. Disturbance from people, pets, light, and noise would be detrimental to the birds on this site • Part of the area is designated high-quality agricultural land: the NPPF refers to the need to retain the “best and most versatile agricultural land”[170]. • Currently this is a relatively quiet and tranquil area, and should be retained as such (NPPF 170, 180) Any development would need: ●A 50m buffer to Stapledon Wood, to prevent demands for tree removal within falling-distance of houses and gardens, with provision for management of the buffer and the wood itself. ●Sustainable Drainage, particularly as it is a headwater of the whole Birket system. ●Linking hedges or similar to provide wildlife corridors between the watercourse, and the LWS ●Provision of protection for the badger population, especially foraging areas and linking corridors ●Bat foraging areas, and tight controls on lighting including switching off all lighting for parts of the night. ●Housing quality as above (policy point 14 above). Achieving all of these would require substantial parts of the parcel, and therefore development is much better directed elsewhere.</p> <p>SP015A West of 13 Acres Road Meols. No known wildlife concerns. Sustainable drainage would be needed.</p> <p>SP016 West of Meols Drive: Wirral Wildlife objects to building on this land. We appreciate that this area is only included in the Green Belt review because Hoylake and West Kirby were included in one settlement in the 2009-2012 discussions, when a review of the Green Belt was not expected, and that it is rated for zero housing. However, loss of Green Belt status does make it easier for housing to be envisaged in the longer term, at least on parts of the area. • The western part of the site is Red Rocks SSSI, and one of our Cheshire Wildlife Trust nature reserves. It comprises sand dune, salt marsh and reedbeds, so little of it could practically be built on. SSSI status shows that it is nationally important, and must be excluded from all building plans (NPPF 170, 171, 174-177). • The rest of Royal Liverpool Golf course is LWS for its sand dune flora and fauna. This includes possible foraging and hibernating areas for the Natterjack Toads from Red Rocks reserve, a legally protected species. These are known to move from the reserve areas into the golf course at times, but how far is still being investigated. Policy CS33 and NPPF 174 apply, and we therefore object to any building on the LWS that would damage the ecological interest of the LWS, which is mostly contained in the roughs between the playing areas. • The SSSI, and probably all the Royal Liverpool Golf Course, are functionally linked to the Dee Estuary SPA for birds, amphibians and plants. Functionally-linked land is not appropriate for built development. We appreciate that the loss of Green Belt status for this land is due to the working of the system. If Hoylake and West Kirby are to be retained as one settlement area, and therefore Green Belt is not a suitable status for this land, then the protection given to wildlife-rich areas in the Local Plan policies should be increased, to make it clear that development that adversely affects a SSSI or LWS will not be allowed. It should be considered that it is possible the golf course might close in future, and the LWS and SSSI would still need to be protected.</p> <p>SP019B East of Glenwood Drive Irby: Wirral Wildlife objects to building on this land because: •It includes Limbo Lane Pond LWS and a number of other ponds, We have only looked at one in the recent past (that in the centre of the same field that has the LWS pond), which proved to be of good quality and supporting smooth newts. Great Crested Newts breed in Arrowe Park adjacent (see ecological studies from the HVDC link construction). Toads (BAP species) are regularly reported from the parcel. Ponds are difficult to retain in ecological health in a built development, because the soil water table usually falls, drying out the pond; water pollution risks increase greatly; disturbance increases e.g. dogs; and amphibians need substantial areas of terrestrial habitat for life outside the breeding season, for which gardens cannot be regarded as suitable as they depend too much on how the owner manages them. Residents sometimes also have safety concerns. Pond life does much better where there is a cluster of ponds, so that aquatic life can move around as the environment varies. • Bats are regularly reported round the area, presumably part of the same population that is based in Arrowe Park: we do not know the roost sites. Bats would suffer loss of foraging land, disturbance from lighting, and possible loss of roost sites. This would have detrimental effects on the bat hotspot of Arrowe Park. Bats are legally protected species, and development that risks a significant impact on their population should be avoided. • Wading birds, ducks and geese are reported to use this area as a high-tide roost or migration stopover. At least some of these birds are from the Dee Estuary SPA,SSSI,Ramsar site, so the parcel may be functionally linked to the Estuary. Development on functionally-linked land is not appropriate. • Other wildlife using this parcel include Hedgehog, Skylark, Lapwing and Owls. Most of these would not survive housing development (hedgehog might, but modern housing with solid garden fences make it unlikely). • The tree belts along Limbo Lane and the straight lane are not LWS, but are identified as Core Biodiversity Areas. Their loss would affect wildlife and particularly break wildlife corridors. • Development would affect the tributary to the Arrowe Brook that runs on the west side. This is an important river corridor from central Wirral all the way to the Birket system, including Meols Meadows SSSI. • Currently this is a relatively quiet and tranquil area, and should be retained as such (NPPF 170, 180). • The land is not marked as “high quality agricultural land”. (NPPF 170). However, it is in use for food production, and loss of food-producing land in general should be a last resort in this time of climate change. Once built on, land is extremely difficult to return to agriculture in future, because of the loss of soil fertility. Any development on this land would need: ●A 100m buffer to the LWS pond, with provision for management of the buffer and the pond itself, to provide terrestrial habitat for amphibians. Possibly making new ponds in that area to compensate for loss of</p>

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	<p>other ponds to the development. ●Sustainable Drainage throughout, to maintain existing soil water levels for the tree belts, watercourse and ponds. ●A buffer at least 50m wide to the watercourse ●Retaining the tree belts and buffering them to provide wildlife corridors ●Bat foraging areas, and tight controls on lighting including switching off all lighting for parts of the night. ●Housing quality as above (policy point 14 above). Achieving all of these would require substantial parts of the parcel, and therefore development is much better directed elsewhere.*SP025B East of Weybourne Close, Upton We are not aware of the wildlife importance of this land, as we have never surveyed it. However, there are reedbeds present in the area, and it is marked as a Core Biodiversity Area. It forms part of a green corridor alongside the M53 itself and is therefore important to wildlife movement (NPPF 170 re ecological networks). It is adjacent to the River Fender, and therefore flood and water management in general would be serious considerations. We therefore consider that this area is of low suitability for housing, and should be retained as Green Belt.</p> <p>SP030 North of Lever Causeway: Wirral Wildlife objects to building on this land because: ● It includes Prenton Dell LWS and a number of other wildlife features. It is one of the larger parcels of Core Biodiversity Area in Wirral, and therefore important as providing a substantial area for wildlife especially those needing big habitat areas. Prenton Dell comprises: - A small area of ancient woodland, which is given special protection in the NPPF (175). - A large former claypit and an adjacent marsh along the course of the Prenton Brook. These habitats have great value to plants and invertebrates. Cheshire Wildlife Trust is currently in discussion with National Grid, who own the claypit floor and marsh, about reinstating suitable management after a lapse of a few years. ● We object to any building on the LWS area because of harm to wildlife. There would also be practical problems of the steep slopes into the claypit floor, localised flooding from the Prenton Brook, protecting the water abstraction point, and lack of adequate vehicular access. ● The tree belts along Lever Causeway and the two coverts are not LWS, but are identified as Core Biodiversity Areas. Their loss would affect wildlife and particularly break wildlife corridors. ● Development would affect the Prenton Brook. This is a headwater to the important river corridor running from central Wirral via the Fender all the way to the Birket system, including Meols Meadows SSSI. ● Currently this is a relatively quiet and tranquil area, and should be retained as such (NPPF 170, 180). ● Part of the land is “high quality agricultural land”. (NPPF 170). Loss of food-producing land in general should be a last resort in this time of climate change. Once built on, land is extremely difficult to return to agriculture in future, because of the loss of soil fertility. ●United Utilities has a drinking water abstraction point near the west end of the LWS, which must be protected from pollution. There are old records of Great Crested Newts on land adjacent to the claypit, but which we cannot access. Modern survey would be required for all waterbodies on the land. Any development on this land would require: ●A buffer zone of 50m width to the LWS, suitably managed, to protect the wildlife interest. Management money would have to be found to improve the current permissive footpath to cope with greater footfall, and to maintain the wildlife interest in the face of more people and dogs. ●Retaining wildlife corridors from the LWS to green areas to the south, including adjacent to the railway line and M53, to maintain those as wildlife corridors. Noise and visual screening from these transport features would also be needed. ●Sustainable Drainage throughout, to maintain existing soil water levels for the LWS, tree belts, watercourse and ponds. ●Protection for the drinking water abstraction point. ●A buffer at least 50m wide to the watercourse above the LWS. ●Retaining the tree belts and coverts and buffering them to provide wildlife corridors. ●Retaining the good quality agricultural land in food production, with a suitable buffer zone between it and housing, and enough land in total to make a farm business viable. ●Housing quality as above (policy point 14 above). Achieving all of these would require substantial parts of the parcel, and therefore development is much better directed elsewhere.West of Landican Lane, Storeton. We are not aware of specific wildlife concerns for this parcel (the hedges of Landican Lane here are relatively modern and do not qualify as “Important”, unlike those of Landican Lane west of the M53). However, it is a key part of the green corridor along and east of the M53, which is an important wildlife corridor for wildlife movement (NPPF 171). As local people we are aware that access to services from here is poor, up steep and narrow lanes to Higher Bebington. We therefore oppose building on this parcel.SP032 Little Storeton. Bats are known to roost in Storeton Hall, and are seen around the village. Any development here would have to take their roosts and their foraging grounds into account. We would therefore object to any extensive infill that harmed bats by loss of foraging ground, roosts, fly routes and lighting.</p> <p>SP033 North of Rest Hill Road. Wirral Wildlife objects to building on this land because: ● Storeton Woods LWS must not be built on, because of loss to wildlife directly and loss of the enjoyment of wildlife by the large number of people who visit this Woodland Trust site. If built round it would become a small isolated site, likely to lose its wildlife interest unless very carefully managed and buffered. The wood already takes a large number of visitors, and significantly greater footfall of people (and dogs) may be harmful, especially to its birds, unless the Woodland Trust and Friends of Storeton Woods can be given more resources for its management. ● The land is an important part of the green corridor east of the M53. A corridor must be maintained to keep a route open for wildlife movement (NPPF171). Building here would breach the natural solid boundary of Mount Road, which runs along the top of the sandstone ridge. ● Substantial parts of the land below the woods are high quality agricultural land: the NPPF refers to the need to retain the “best and most versatile agricultural land”[170]. Once built on, land cannot be easily returned to food production because of loss of soil fertility. ● The land slopes steeply to the Clatter Brook, a tributary of the Dibbinsdale river system, which runs through one of our Cheshire Wildlife Trust nature reserves. Development would affect this with increased pollution risk and increased run-off in rain, exacerbating the problems of scour in the Dibbinsdale SSSI. The Dibbin is an important river corridor from central Wirral via Dibbinsdale SSSI, where we have several nature reserves, and the Dibbinsdale LNR, to the Mersey. ● Currently this is a relatively quiet and tranquil area, and should be retained as such (NPPF 170, 180) Any development on this land would need ●A 50m buffer to Storeton Woods, to prevent demands for tree removal within falling-distance of houses and gardens, with provision for management of the buffer and the wood itself. ●Sustainable Drainage, to maintain existing soil water levels for the wood and avoid scour in the watercourse. A buffer at least 50m wide to the watercourse. ●Linking hedges or similar to provide wildlife corridors between the woods, watercourse, and the greenfield areas to the south and west. ●Bat foraging areas, and tight controls on lighting including switching off all lighting for parts of the night. ●Housing quality as above (policy point 14 above), to make best use of the land. Achieving all of these would require substantial parts of the parcel, and therefore development is much better directed elsewhere.SP034 Storeton Village: We note this is rated for zero houses. Any development here would have to take into account the likelihood of bats. We would therefore object to any extensive infill that harmed bats by loss of foraging ground, roosts, fly routes and lighting.SP035 North of Marsh Lane, Storeton: We are not</p>

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	<p>aware of any wildlife issues with this parcel. The tree belts along Lever causeway would need to be preserved, preferably improved, as a wildlife corridor. Footfall in Storeton Woods would increase, so any developer should contribute to its management costs.SP036 North of Red Hill Road, Storeton: Wirral Wildlife objects to building on this land because: • Storeton Woods LWS must not be built on, because of loss to wildlife directly and of the enjoyment of wildlife by the number of people who visit this site. If built round it would become a small isolated site, likely to lose its wildlife interest unless very carefully managed and buffered. This part of the wood is not in active management, being neglected by its owner, but has considerable de facto public access. • The land is an important part of the green corridor east of the M53. A corridor must be maintained to keep a route open for wildlife movement (NPPF171). Building here would breach the natural solid boundary of Mount Road, which runs along the top of the sandstone ridge. • Substantial parts of the land below the woods are high quality agricultural land: the NPPF refers to the need to retain the "best and most versatile agricultural land"[170]. Once built on, land cannot be easily returned to food production because of loss of soil fertility. • The land slopes steeply to Clatter Brook, a tributary of the Dibbinsdale river system, which runs through one of our Cheshire Wildlife Trust nature reserves. Development would affect this with increased pollution risk and increased run-off in rain, exacerbating the problems of scour in the Dibbinsdale SSSI. The Dibbin is an important river corridor from central Wirral via Dibbinsdale SSSI, where we have several nature reserves, and the Dibbinsdale LNR, to the Mersey. • Currently this is a relatively quiet and tranquil area, and should be retained as such (NPPF 170, 180).</p> <p>Any development on this land would need •A 50m buffer to Storeton Woods, to prevent demands for tree removal within falling-distance of houses and gardens, with provision for management of the buffer and the wood itself. •Sustainable Drainage, to maintain existing soil water levels for the wood and avoid scour in the watercourse. A buffer at least 50m wide to the watercourse. •Linking hedges or similar to provide wildlife corridors between the woods, watercourse, and the greenfield areas to the south and west. •Bat foraging areas, and tight controls on lighting including switching off all lighting for parts of the night. •Housing quality as above (policy point 14 above), to make best use of the land. Achieving all of these would require substantial parts of the parcel, and therefore development is much better directed elsewhere.SP037 East of Brimstage Lane, Storeton We are not aware of any major wildlife issues with this parcel. However, the land is part of an important part of the green corridor east of the M53. This corridor must be maintained to keep a route open for wildlife movement (NPPF171). Building here would breach the natural solid boundary of Mount Road, which runs along the top of the sandstone ridge. Most of the land is high quality agricultural land: the NPPF refers to the need to retain the "best and most versatile agricultural land"[170]. Once built on, land cannot be easily returned to food production because of loss of soil fertility. The land drains to Clatter Brook, a tributary of the Dibbinsdale river system, which runs through one of our Cheshire Wildlife Trust nature reserves. Development would affect this with increased pollution risk and increased run-off in rain, exacerbating the problems of scour in the Dibbinsdale SSSI. The Dibbin is an important river corridor from central Wirral via Dibbinsdale SSSI, where we have several nature reserves, and the Dibbinsdale LNR, to the Mersey. Currently this is a relatively quiet and tranquil area, and should be retained as such (NPPF 170, 180) Access to services is poor, with narrow lanes the only road access. For these reasons, we object to housing development on this parcel, and consider it should remain in Green Belt. If there was development on this land, there would have to be; •preservation of Umbertstone Covert, as an established though species-poor woodland; •a substantial buffer strip along the M53 for noise and visual screening, and to maintain a wildlife corridor along the motorway; •Sustainable Drainage, to maintain existing soil water levels for the wood and avoid scour in the watercourse. A buffer at least 50m wide to the watercourse; •checking of the several ponds present for Great Crested Newts, which have been found in recent years on Brackenwood Golf Course western section.SP038 East of Mount Road: The main wildlife issue we are aware of on Brackenwood Golf Course is the presence of Great Crested Newts, presumed breeding in one of the ponds, but the breeding site is not known. There are also good numbers of mature trees. This area has been zero-rated for housing because of the golf course. However, a report was commissioned by Leisure Services into golf provision on Wirral, in the light of cuts to Council budgets, and there were rumours that one cost-saving might be to either close Brackenwood Golf Course, or close the southern part (SP039) and reduce it back to its original 9-hole course. This report needs to be found and taken into account. Golf is an aging and declining sport on Wirral, several local clubs we know to be struggling financially, and the company running Ellesmere Port golf course has just gone into administration. Day tickets are now available on all the private courses at little more than the cost of a ticket on the Council courses. Bromborough and Prenton golf courses are not far away, given that most golfers arrive at Brackenwood by car. We therefore propose that this parcel could support small amounts of housing. Due area would need to be set aside for the Great Crested Newts, and the mature trees should be incorporated in the design, but if Green Belt development is needed at all, a small number of houses could still be fitted in on this parcel. The land lies east of Mount Road, which runs on the physical boundary of the sandstone ridge, and therefore forms a solid boundary to the Green Belt. Access to services and public transport is much better on the golf course area than west of Mount Road, where there are steep slopes and narrow roads. The area is adjacent to existing housing. It does not sever a wildlife corridor. It is not high quality farmland. The M53 junction and approach roads, plus existing housing, mean it is less quiet than areas to the west of Mount Road. As with all greenfield housing, building should be affordable housing to zero-carbon standards (paragraph 14 above). For all these reasons we put forward that this part of Brackenwood Golf Course should be considered for limited housing and released from Green Belt, if Green Belt development is needed at all, in preference to land west of Mount Road (SP030-037) which breaches a natural and solid boundary to the Green Belt (Mount Road), and has all the disadvantages listed above.</p> <p>SP39 South of Peter Prices Lane: We are not aware of any special wildlife concerns on this parcel. There are good numbers of mature trees. This area has been zero-rated for housing because of the golf course. However, a report was commissioned by Leisure Services into golf provision on Wirral, in the light of cuts to Council budgets, and there were rumours that one cost-saving might be to either close Brackenwood Golf Course, or close the southern part (SP039) and reduce it back to its original 9-hole course. This report needs to be found. Golf is an aging and declining sport on Wirral, several local clubs we know to be struggling financially, and the company running Ellesmere Port golf course has just gone into administration. Day tickets are now available on all the private courses at little more than the cost of a ticket on the Council courses. Bromborough and Prenton golf courses are not far away, given that most golfers arrive at Brackenwood by car. We therefore propose that this parcel be considered for housing. The mature trees should be incorporated in the design, and the Recreation Ground kept as the necessary Public Open Space for the development, but if</p>

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	<p>Green Belt development is needed at all, a substantial number of houses could still be fitted in on this parcel. The land lies east of Mount Road, which runs on the physical boundary of the sandstone ridge, and therefore forms a solid boundary to the Green Belt. Brimstage Road forms a solid southern boundary. Access to services and public transport is much better from the golf course than west of Mount Road, where there are steep slopes and narrow roads. The area is adjacent to existing housing. It does not sever a wildlife corridor. It is not high quality farmland. The M53 junction and approach roads, plus existing housing, mean it is less quiet than areas to the west of Mount Road. As with all greenfield housing, building should be affordable housing to zero-carbon standards (paragraph 14 above). For all these reasons we put forward that this part of Brackenwood Golf Course should be considered for housing land and released from Green Belt, if Green Belt development is needed at all, in preference to land west of Mount Road (SP030-037) which breaches a natural and solid boundary to the Green Belt (Mount Road), and has all the disadvantages listed above.SP040 North of Old Clatterbridge Road: We object to loss of this parcel to housing development on the grounds of environmental sustainability and wildlife value. It forms part of Claremont Farm. This and parcel 42 have some of the highest quality agricultural land in Wirral, used for horticulture and arable food production. Once land is built on, it is very difficult to restore to agricultural production because of loss of soil fertility. It is foolish, and contrary to the NPPF (170b), to build on some of the best agricultural land in Wirral, in a time of climate change and increased uncertainty over food supplies. The hedges running across the parcel are “important” in Hedgerow Regulation terms and probably worthy of Local Wildlife Site status. The land is part of an important part of the green corridor east of the M53. This corridor must be maintained to keep a route open for wildlife movement (NPPF171). The farm is in Higher Level Stewardship and therefore managed to give various environmental and societal benefits, including an education programme. It has a thriving farm shop, supplying fresh produce to the adjacent estate and the wider community.SP041 West of Brimstage Lane, Storeton: We are not aware of any major wildlife issues with this parcel, but we object on environmental sustainability grounds, as most of the land is high quality agricultural land: the NPPF refers to the need to retain the “best and most versatile agricultural land”[170]. Once built on, land cannot be easily returned to food production because of loss of soil fertility. Other considerations include ●There would have to be a substantial buffer strip along the M53 for noise and visual screening, and to maintain a wildlife corridor along the motorway. This should include protecting the Edwardian tree belt. ●The land drains to tributaries of the Dibbinsdale river system, which run through our Cheshire Wildlife Trust nature reserves. Development would affect this with increased pollution risk and increased run-off in rain, exacerbating the problems of scour in the Dibbinsdale SSSI. The Dibbin is an important river corridor from central Wirral via Dibbinsdale SSSI, where we have several nature reserves, and the Dibbinsdale LNR, to the Mersey. ●The land is part of an important part of the green corridor east of the M53. This corridor must be maintained to keep a route open for wildlife movement (NPPF171). Building here would breach the natural solid boundary of Mount Road, which runs along the top of the sandstone ridge. Currently this is a relatively quiet and tranquil area, and should be retained as such (NPPF 170, 180). Access to services is poor, with narrow lanes the only road access. For these reasons this area is a poor choice for housing development.*1.25 SP042 North of Poulton Hall Road: We object to loss of this parcel to housing development on the grounds of environmental sustainability and wildlife value. Large parts of it form land of Claremont Farm.</p> <p>The parcel includes part of Dibbinsdale SSSI, known as Thornton Wood, which is also a Cheshire Wildlife Trust nature reserve. Development on the SSSI is obviously unacceptable, and impractical given its slopes. Thornton Wood has for some decades been managed by Wirral Countryside Volunteers for CWT, who have reinstated coppice management on part of it, opened up the canopy where needed, and restored it to good/recovering ecological condition. Work is on-going especially on invasive non-native species at the eastern end. This is ancient woodland, given specific protection under the NPPF (175) because of its irreplaceable nature, species-richness and sensitivity to disturbance. We also oppose any housing next to the SSSI, as housing next to an ancient wood usually leads to its deterioration, because of disturbance and trampling, to which the ground flora is particularly sensitive. The slopes here are very steep and there are no existing access paths, so any new access by people would be detrimental. Dibbinsdale is of major importance for bats, supporting some of the highest diversity of species and estimated numbers of individual bats in Wirral. The bats forage in all the areas surrounding the Dibbinsdale woods, and are known to use hedgerows as foraging corridors. Bats are legally protected species under EU and UK legislation. While roosts and the animals themselves have direct protection, it is up to Local Plans such as this to protect foraging areas. Loss of green land to built development impacts on bats both directly (loss of invertebrate food) and through increased lighting. Building on this parcel is therefore likely to harm local bat populations. This and parcel 42 have some of the highest quality agricultural land in Wirral, used for horticulture and arable food production. Once land is built on, it is very difficult to restore to agricultural production because of loss of soil fertility. It is foolish, and contrary to the NPPF (170b), to build on some of the best agricultural land in Wirral, in a time of climate change and increased uncertainty over food supplies. The land drains to the Dibbinsdale river system, which runs through our Cheshire Wildlife Trust nature reserves. Development would affect this with increased pollution risk and increased run-off in rain, exacerbating the problems of scour in the Dibbinsdale SSSI. The Dibbin is an important river corridor from central Wirral via Dibbinsdale SSSI, where we have several nature reserves, and the Dibbinsdale LNR, to the Mersey. Many of the hedges running across the parcel are “important” in Hedgerow Regulation terms and probably worthy of Local Wildlife Site status. One in particular, running north-south, is one of the most species-rich hedges known in Wirral. The land is part of an important part of the green corridor east of the M53, from the southern boundary of Wirral Borough to Prenton. This corridor must be maintained to keep a route open for wildlife movement (NPPF171).Currently this is a relatively quiet and tranquil area, and should be retained as such (NPPF 170, 180). Land is under consideration for development along all currently undeveloped Dibbinsdale boundary. Cumulative effects of these proposed areas must be considered, as in total they would represent a very large threat to the continued health of the SSSI. The farm is in Higher Level Stewardship and therefore managed to give various environmental and societal benefits, including an education programme. It has a thriving farm shop, supplying fresh produce to the adjacent estate and the wider community. For all these reasons we object to the loss of this land to housing and consider it should stay as Green Belt.SP043 East of Poulton Road, Spital: We object to loss of this parcel to housing development on the grounds of environmental sustainability and wildlife value. The parcel includes large parts of Dibbinsdale SSSI. This is ancient woodland, given specific protection under the NPPF (175) because of its irreplaceable nature, species-richness and sensitivity to disturbance. It also includes Boden’s Hey, a large</p>

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	<p>area of neutral grassland currently undergoing restoration to good ecological condition. We totally oppose any housing on the SSSI. We also oppose housing next to it, as development next to an ancient wood leads to its deterioration, because of disturbance and trampling, to which the ground flora is particularly sensitive. There is already considerable use of the public parts of the SSSI, by people and dogs, which has noticeably increased since the imposition of parking charges at Eastham Country Park. Further increases in usage are highly likely to be damaging, and will require more management investment. The area is a large Core Biodiversity Area, one of the largest in Wirral. At the time of the UDP inquiry, this parcel was considered for housing, and the Inspector ruled it was to be kept as farmland – see the UDP report. The reasons given still apply. This is the last major “green lung” into the lower part of Dibbinsdale SSSI.</p> <p>The SSSI inevitably, being clough woodland, consists of narrow valleys which are vulnerable to disturbance, pollution and general edge effects along the boundaries. Dibbinsdale needs more buffers not less, and ameliorating not worsening its drainage problems. Dibbinsdale is of major importance for bats, supporting some of the highest diversity of species and estimated numbers of individual bats in Wirral. The bats forage in all the areas surrounding the Dibbinsdale woods, and are known to use hedgerows as foraging corridors. Bats are legally protected species under EU and UK legislation. While roosts and the animals themselves have direct protection, it is up to Local Plans such as this to protect foraging areas. Loss of green land to built development impacts on bats both directly (loss of invertebrate food) and through increased lighting. Building on this parcel is therefore likely to harm local bat populations. This and parcels 40, 42 have some of the highest quality agricultural land in Wirral, used for horticulture and arable food production. Once land is built on, it is very difficult to restore to agricultural production because of loss of soil fertility. It is foolish, and contrary to the NPPF (170b), to build on some of the best agricultural land in Wirral, in a time of climate change and increased uncertainty over food supplies. The land drains to the Dibbinsdale river system, which runs through our Cheshire Wildlife Trust nature reserves. Development would affect this with increased pollution risk and increased run-off in rain, exacerbating the problems of scour in the Dibbinsdale SSSI. The Dibbin is an important river corridor from central Wirral via Dibbinsdale SSSI, where we have several nature reserves, and the Dibbinsdale LNR, to the Mersey. Part (14%) of the area is already in Flood Zone 3 or above. The land is part of an important part of the green corridor east of the M53, from the southern boundary of Wirral Borough to Prenton. This corridor must be maintained to keep a route open for wildlife movement (NPPF171) Land is under consideration for development along all the currently-undeveloped Dibbinsdale boundary Cumulative effects of these proposed areas must be considered, as in total they would represent a very large threat to the continued health of the SSSI. For all these reasons we object to the loss of this land to housing, and consider it should stay as Green Belt.</p> <p>SP044 West of Dibbinsdale Road: We object to loss of this parcel to housing development on the grounds of environmental sustainability and wildlife value. The parcel includes Intake Wood, part of Dibbinsdale SSSI and Cheshire Wildlife Trust nature reserve. This is ancient woodland, given specific protection under the NPPF (175) because of its irreplaceable nature, species-richness and sensitivity to disturbance. We totally oppose any housing on the SSSI. We also oppose housing next to it, as development next to an ancient wood leads to its deterioration, because of disturbance and trampling, to which the ground flora is particularly sensitive. Dibbinsdale is of major importance for bats, supporting some of the highest diversity of species and estimated numbers of individual bats in Wirral. The bats forage in all the areas surrounding the Dibbinsdale woods, and are known to use hedgerows as foraging corridors. Bats are legally protected species under EU and UK legislation. While roosts and the animals themselves have direct protection, it is up to Local Plans such as this to protect foraging areas. Loss of green land to build development impacts on bats both directly (loss of invertebrate food) and through increased lighting. Building on this parcel is therefore likely to harm local bat populations. The land drains to the Dibbinsdale river system, which runs through our Cheshire Wildlife Trust nature reserves. Development would affect this with increased pollution risk and increased run-off in rain, exacerbating the problems of scour in the Dibbinsdale SSSI. The Dibbin is an important river corridor from central Wirral via Dibbinsdale SSSI, where we have several nature reserves, and the Dibbinsdale LNR, to the Mersey. About 10% of the land is already in Flood Zone 3 or above. Most of the grassland is currently run as organic beef grazing. Organic farmland supports significantly more wildlife than conventional systems. Once land is built on, it is very difficult to restore to agricultural production because of loss of soil fertility. It is contrary to the NPPF (170b) to build on the best agricultural land, and ill-advised in a time of climate change and increased uncertainty over food supplies. The land is part of an important part of the green corridor east of the M53, from the southern boundary of Wirral Borough to Prenton. This corridor must be maintained to keep a route open for wildlife movement (NPPF171).</p> <p>There are two good ponds in the area, cleared out by Wirral Wildlife some years ago. One in particular has developed a good invertebrate fauna and may be considered for LWS status when next surveyed. Land is under consideration for development along all the currently-undeveloped Dibbinsdale boundary. Cumulative effects of these proposed areas must be considered, as in total they would represent a very large threat to the continued health of the SSSI.</p> <p>SP045 West of Raby Drive: We object to loss of this parcel to housing development on the grounds of environmental sustainability and wildlife value. The parcel includes Foxes Wood, part of Dibbinsdale SSSI and Cheshire Wildlife Trust nature reserve. This is ancient woodland, given specific protection under the NPPF (175) because of its irreplaceable nature, species-richness and sensitivity to disturbance. We totally oppose any housing on the SSSI. We also oppose housing next to it, as development next to an ancient wood usually leads to its deterioration, because of disturbance and trampling, to which the ground flora is particularly sensitive. The parcel also includes Raby Mere and Woods LWS, which we surveyed again last year. We oppose any housing on the LWS. Road access to the central part of the parcel, between the SSSI and LWS, would be very difficult to gain without damaging something, so in practice considerably less than 50% of the area is developable. Housing between these two important wildlife sites would damage both by disturbance, lights, pets, and noise. Dibbinsdale is of major importance for bats, supporting some of the highest diversity of species and estimated numbers of individual bats in Wirral. The bats forage in all the areas surrounding the Dibbinsdale woods, and are known to use hedgerows as foraging corridors. Bats are legally protected species under EU and UK legislation. While roosts and the animals themselves have direct protection, it is up to Local Plans such as this to protect foraging areas. Loss of green land to built development impacts on bats both directly (loss of invertebrate food) and through increased lighting. Building on this parcel is therefore likely to harm local bat populations. The land drains to the Dibbinsdale river system, which runs through our Cheshire Wildlife Trust nature reserves.</p>

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	<p>Development would affect this with increased pollution risk and increased run-off in rain, exacerbating the problems of scour in the Dibbinsdale SSSI. The Dibbin is an important river corridor from central Wirral via Dibbinsdale SSSI, where we have several nature reserves, and the Dibbinsdale LNR, to the Mersey. The land is part of an important part of the green corridor east of the M53, from the southern boundary of Wirral Borough to Prenton. This corridor must be maintained to keep a route open for wildlife movement (NPPF171). Land is under consideration for development along all the currently-undeveloped Dibbinsdale boundary. Cumulative effects of these proposed areas must be considered, as in total they would represent a very large threat to the continued health of the SSSI.</p> <p>SP046 West of Plymyard Dale, Brookhurst: We object to loss of this parcel to housing development on the grounds of wildlife value. The parcel includes several Local Wildlife Sites: ● Plymyard Dale LWS. This is ancient woodland, given specific protection under the NPPF (175) because of its irreplaceable nature, species-richness and sensitivity to disturbance. We oppose housing next to ancient woodland, as development next to an ancient wood usually leads to its deterioration, because of disturbance and trampling, to which the ground flora is particularly sensitive. The ancient woodland, though mostly east of the Dibbin Brook, extends onto the golf course land west of the brook in places, and up the side valley into the course. ● Bromborough Golf Course ponds LWS: currently some 6 ponds scattered across the golf course are designated in the LWS, with the possibility of more to be added as the course has been actively bringing them into good management. Ponds are difficult to retain in ecological health in a built development, because the soil water table usually falls, drying out the ponds, water pollution risks increase greatly, disturbance increases e.g. dogs, and amphibians need substantial areas of terrestrial habitat for life outside the breeding season. Gardens cannot be regarded as suitable for this as it depend too much on how the owner manages them. Residents sometimes also have safety concerns. Pond life does much better where there is a cluster of ponds, so that aquatic life can move around as the environment varies. ● Hargrave House ponds. A cluster which was excellent in the past but has not been surveyed recently for lack of access. The same considerations apply as to the golf course ponds. The land drains to the River Dibbin and through that to the Dibbinsdale SSSI river system. Development would affect this with increased pollution risk and increased run-off in rain, exacerbating the problems of scour in the Dibbinsdale SSSI. The Dibbin is an important river corridor from central Wirral via Dibbinsdale SSSI to the Mersey. ● Dibbinsdale valley, including the SSSI and the various LWS, is of major importance for bats, supporting some of the highest diversity of species and estimated numbers of individual bats in Wirral. The bats forage in all the areas surrounding the Dibbinsdale woods, and are known to use hedgerows as foraging corridors. Bats are legally protected species under EU and UK legislation. While roosts and the animals themselves have direct protection, it is up to Local Plans such as this to protect foraging areas. Loss of green land to built development impacts on bats both directly (loss of invertebrate food) and through increased lighting. Building on this parcel is therefore likely to harm local bat populations. The land is part of an important part of the green corridor east of the M53, from the southern boundary of Wirral Borough to Prenton. This corridor must be maintained to keep a route open for wildlife movement [NPPF 171]. Land is under consideration for development along all the currently-undeveloped Dibbinsdale boundary, and the upper reaches of the system as here. Cumulative effects of these proposed areas must be considered, as in total they would represent a very large threat to the continued health of the SSSI. Currently this is a relatively quiet and tranquil area, and should be retained as such [NPPF 170, 180].</p> <p>SP047 South of Eastham Rake: This parcel is secondary woodland on the former farm buildings area. It suffers from pollution from the closed landfill site to its south, often showing orange water in the ditch. It is further constrained by the railway and M53, being very noisy, and is in local opinion not suitable for housing. We agree with the rating for zero houses.</p> <p>SP048 West of Lowfields Avenue, Eastham: We recognise that this is rated for zero housing. We would anyway object to housing on Lowfields LWS. This is mature woodland, at least part of it ancient, and is currently being brought back into good management by a local group operating under Cheshire Wildlife Trust. We would also object to housing on this narrow strip of grassland alongside the wood. The usual objections to housing adjacent to ancient woodland apply, also the considerations of risks to the Dibbin catchment, and loss of the narrow wildlife corridor available here between housing and the M53. Note that a sewer runs under the land and a pylon line above it.</p> <p>SP049 South of Mill Park, Eastham: We are not aware of any particular wildlife value to this parcel, but it is classified as “high quality farmland” and used for arable crops, despite some urban-fringe problems. Once land is built on, it is very difficult to restore to agricultural production because of loss of soil fertility. It is contrary to the NPPF [70b] to build on high-quality agricultural land. The M53 here is a considerable barrier to less-mobile forms of wildlife, and an eventual aim should be to try to make some sort of way for wildlife to move from the upper Dibbin and LWS south of the M53, to the Dibbin complex in Wirral Borough.</p> <p>SP050 West of Rivacre Road, Eastham: We are not aware of any particular wildlife value to this parcel, but it forms part of a wildlife corridor from the M53 and land south of it up to Eastham Woods LWS. This corridor must be retained for wildlife movement. Most of the parcel is classified as “high quality farmland”. Once land is built on, it is very difficult to restore to agricultural production because of loss of soil fertility. It is contrary to the NPPF (170b) to build on high-quality agricultural land.</p> <p>SP051 East of Rivacre Road, Eastham: We are not aware of any particular wildlife value to this parcel, but it forms part of a wildlife corridor from the M53 and land south of it up to Eastham Woods LWS. This corridor must be retained for wildlife movement. Most of the parcel is classified as “high quality farmland”. Once land is built on, it is very difficult to restore to agricultural production because of loss of soil fertility. It is contrary to the NPPF (170b) to build on high-quality agricultural land.</p> <p>SP052 Eastham Village Conservation Area: We note that this is rated for zero houses. Should any development be allowed in future, it would have to take account of the likely presence of bats.</p> <p>SP053 St David’s Road, Eastham: We are not aware of any wildlife concerns on this parcel.</p> <p>SP054 North of St David’s Road, Eastham: We note that this is rated for zero housing. Eastham Country Park is a LWS (Eastham Woods) and we would object to any housing development on that site, and ask for a substantial buffer (at least 50m) between it and any further development adjacent to it. We would also want full protection of Carlett Park Allotments, as they are engaged in sustainable food production. The large area of open space in this parcel is marked as a substantial Core Biodiversity Area and therefore should be protected. We appreciate that the loss of Green Belt status for this land is due to the working of the system. If Green Belt is not a suitable status for this land, then the protection given to wildlife-rich areas in the Local Plan policies should be increased, to make it clear that development that adversely affects a LWS will not be allowed.</p> <p>SP055 East of Ferry Road, Eastham: We are not aware of any particular wildlife concerns on this parcel, apart from the general ones relating to the proximity to Mersey Estuary SSSI, SPA and Ramsar site. Strict controls on pollution would be needed, but the deep channel prevents birds feeding close to shore here.</p>

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	<p>SP058 C, D, E East and west of Pipers Lane, Heswall: This parcel includes land that has historically been host to active badger setts. These were closed under licence, in dubious circumstances, but neglect of at least one field has allowed gorse to grow back. Local people report badger activity in the area. Until a full badger survey is allowed by owners, we have to assume the presence of badgers, and consequently object to zoning for development. The small fields in this wider area have not been adequately surveyed, and may have other wildlife importance. They form a connecting area between the Dee clay cliffs (part SSSI, part IWS), Heswall Fields LWS, the Wirral Way LWS, the Dungeon LWS and wider farmland including Oldfield Farm. The wildlife corridor function of this area is therefore likely to be important.</p> <p>SP059B,C,D Land at 41-61 Thurstaston Road, Irby: We are not aware of any particular wildlife concerns on these parcels, but Greasby Brook at the west side would have to be protected by a 50m buffer, suitably managed. Sustainable drainage and pollution controls would be required. Greasby Brook skirts Thurstaston Common SSSI on its way to join the Arrowe Brook and eventually the Birket.</p> <p>SP059E Rear of Irby Hall: We object to development on this land because it lies adjacent to Backford Road Pond LWS, which supports an important population of Great Crested Newts. GCN are a legally protected species. Apart from our surveys each decade, the presence of these newts has been confirmed during the planning process for land south of Townsend Avenue (refused at appeal last year), and also by regular reports of GCN being found in gardens of the housing on either side. The most recent photo we have, taken only a few weeks ago, was of one found in a garden on Dawlish Road. GCN need substantial terrestrial areas in addition to the breeding pond. The current convention is to allow 250m round the breeding pond, which covers most of this parcel. Gardens do not form reliable habitat for GCN, as too much depends on how they are managed. The current population does use some gardens, but also has the farmland to forage in. There would also be a serious risk that building on this parcel would lower the soil water table and lead to permanent drying out of what is a fairly shallow pond. Occasional drying out, as in this summer, is not harmful, as it prevents fish colonisation while only losing one breeding season for the newts, but more frequent drying would harm the population. Other wildlife reported from the area includes Hedgehogs and Owls.</p> <p>SP060 South of Thingwall Road, Irby: We object to building on this parcel because of effects on nature conservation. Harrock Wood LWS is ancient woodland, given specific protection under the NPPF (175) because of its irreplaceable nature, species-richness and sensitivity to disturbance. We oppose housing next to ancient woodland, as development next to an ancient wood usually leads to its deterioration, because of disturbance and trampling, to which the ground flora is particularly sensitive. Harrock Wood would become isolated from other woodland, especially if the Limbo Lane parcel (19B) was also built, which would negatively affect its biodiversity value. Small isolated sites inevitably suffer species extinctions. Harrock Wood is a narrow valley woodland, already well-used as a walking route. Extra people pressure from housing around it would be detrimental to its flora and possibly fauna. No doubt the National Trust will be making a submission about this site. The Arrowe Brook flows across the parcel and through Harrock Wood. It has a water level monitoring station at the north end of the wood, installed a few years ago because of concerns about possible flooding downstream. The brook needs protection from pollution, and scour caused by sudden high flows when a rainstorm falls on a hard-surfaced urban area. We had a report a few months ago of Great Crested Newts being seen on land behind Somerset Road, but have not been able to confirm this. Nearly all the land is high quality agricultural land: the NPPF refers to the need to retain the "best and most versatile agricultural land"[170]. If development were allowed, then Harrock Wood must have a buffer zone of at least 50m width, to prevent calls for removing trees in the wood seen as in danger of falling on houses or gardens. The Arrowe Brook would need a similar buffer of 50m each side, incorporating a large sustainable drainage scheme, to mitigate the risk of flood downstream. The presence or not of Great Crested Newts would have to be established, as their presence would require further mitigation. Any development should contribute funds to the National Trust for the management costs of Harrock Wood, which are likely to rise with increased usage. Such increased usage being highly undesirable, alternative footpaths should be constructed and planted with woodland to try to draw people away from the most sensitive route. Because of the need to protect Harrock Wood and the Arrowe Brook, a substantial area across the centre of the site would have to remain undeveloped, and it would be better to leave the whole area as Green Belt. Irby was put into a settlement with Pensby/Thingwall when the settlements were drawn up pre-2012, when a Green Belt review was thought unlikely. In practice Irby is almost separate, and allowing building on this parcel would merge the villages.*1.43</p> <p>SP061 North of Gills Lane, Pensby: We are not aware of any specific wildlife concerns in this parcel, but the pond set would need to be checked for Great Crested Newts and other wildlife. At least one native Black Poplar grows in the area and would need to be retained. 60% of the land is high quality agricultural land: the NPPF refers to the need to retain the "best and most versatile agricultural land"[170].</p> <p>SP062 West of Barnston Village, plus infill sites SP063,64,65: We object to building on these parcels because of effects on nature conservation. Barnstondale LWS is ancient woodland, given specific protection under the NPPF (175) because of its irreplaceable nature, species-richness and sensitivity to disturbance. We oppose housing next to ancient woodland, as development next to an ancient wood usually leads to its deterioration, because of disturbance and trampling, to which the ground flora is particularly sensitive. Barnstondale is a narrow valley woodland, currently without a public footpath so with little disturbance. The Prenton Brook flows across the parcel and through Barnstondale. The brook needs protection from pollution, and scour caused by sudden high flows when a rainstorm falls on a hard-surfaced urban area. Barnstondale is a major population centre and corridor for badgers, possibly the greatest density in Wirral. It is a corridor with few road crossings, therefore relatively safe for badgers to move around. Wirral's badger population, unlike the national one, is constrained by loss of habitat, road deaths and illegal persecution, and needs to be supported not harmed. Housing development around the dale would reduce foraging ground and greatly increase disturbance by people and dogs, and would therefore harm the badgers. There are reliable reports of bats in and around the woodland. Bats are legally protected species under EU and UK legislation. While roosts and the animals themselves have direct protection, it is up to Local Plans such as this to protect foraging areas. Loss of green land to built development impacts on bats both directly (loss of invertebrate food) and through increased lighting. Building on this parcel is therefore likely to harm local bat populations. Half of the land is high quality agricultural land: the NPPF refers to the need to retain the "best and most versatile agricultural land"[170].</p> <p>Any substantial infill could have similar effects to building on the whole parcel. If development were allowed, then Barstondale LWS must have a buffer zone of at least 50m width, to prevent calls for</p>

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	<p>removing trees in the wood seen as in danger of falling on houses or gardens. The Prenton Brook above the dale would need a similar buffer of 50m each side, incorporating a large sustainable drainage scheme, to maintain exist water levels. Since the wildlife of the wood is currently little disturbed, public open space would be needed away from the wood to try to distract people from entering the ancient woodland. A range of measures would be needed to try to reduce harm to badgers and bats, including restrictions on fencing, properly managed dedicated foraging areas, and restrictions on lighting.SP061,62 and 64: Barnston area: The whole field area around Barnston has value for birds. A recent survey concluded that Red List birds (Birds of Conservation Concern) resident there included lapwing, herring gull, skylark, linnet, house sparrow, starling, barn owl. Amber list birds included greylag goose, mallard, redshank, common gull, tawny owl, kestrel, dunnoek, black-headed gull, stock dove and meadow pipit. A number of the surveyed fields during winter months become quite waterlogged and regularly provide refuge to greylag and pink footed geese, curlew, redshank and oystercatchers. They may therefore qualify as functionally-linked to the Dee Estuary SPA. # Parts of the parcel qualify as high-quality agricultural land, building on which would be contrary to the NPPF [170]. Until recently one farm was in Higher Level Stewardship, and there are wide field margins, which were planted up with a mix of wild flowers and support good populations of pollinators. SP065,66 Landican infill village. We object to any substantial infill at Landican, where there are populations of bats, badger, great crested newt, brown hare and other wildlife in and around the existing hamlet, especially on Old Hall Farm. We have done repeat surveys this year and expect to draw up this winter Local Wildlife Site proposals for hedges and ponds on Old Hall Farm and Landican Lane.SP071 Land at Chester Road, Gayton: We are not aware of any wildlife concerns on this land, but note several ponds are marked on the map. Around a quarter of the land is high quality agricultural land: the NPPF refers to the need to retain the "best and most versatile agricultural land"[170].SP092; SP096 – SP0105; SP0110. Land all along the Dee estuary around Lower Heswall. These fields are used by wintering birds from the Dee Estuary such as curlews, snipe, lapwing and black-tailed godwits. As such they should qualify as Functionally-linked land to the SPA. We therefore support the retention of these areas as open field and object to proposals to build on them. This group of sites, with very limited existing housing, makes up an important wildlife corridor along the Dee shore. Building in this area would impinge on the Dee Estuary directly though lights, pets, pollution risks and general disturbance. It is relatively quiet and dark at present. Development on a currently-undeveloped coast is protected by policies in the draft Local Plan. Such development should “require a coastal location”. Housing does not require a coastal location.SP108 Land at Wallasey Loop: We are not aware of any wildlife concerns on this landSP109 Boathouse Lane, Gayton: We are not aware of any wildlife concerns on this land, but it seems to be largely ponds, which should be checked for wildlife value.SP110 Wittering Lane: There is a badger sett on the LWS here, which would entail due restrictions to avoid harm to the badgers SP110 Wittering Lane: There is a badger sett on the LWS here, which would entail due restrictions to avoid harm to the badgers.</p> <p>EMPLOYMENT LAND ALLOCATIONS:</p> <p>We have little or no information on most of the proposed sites, and are not aware therefore of any wildlife concerns. Two general points: 1) Sites that lie alongside the Mersey Estuary (Wirral International Business Park) will have to take due account of the wildlife especially birds e.g. to avoid pollution and disturbance problems. These include: - ELPS 017 East of Tulip, ELPS 100 Southern Reclamation Area, - ELPS 242 Slack Wood (where there is also archaeological interest), ELPS 415 Former Eastham Sands. 2) Currently undeveloped sites along the Birket are important as a wildlife corridor and also for bird foraging: species observed there include Barn Owl and Kestrel. Suitable habitats should be retained in future development. - ELPS 024 East of Manor Bakery (also hedges and a species-rich grassland), - ELPS 070 Land at Peninsula Business Park; 3) - Note that ELPS 363 Former Epichem includes Old Hall Copse LWS, designated for bat roosts. Re-development would need to avoid harm to the bats and to the trees used as roosts.</p> <p>HOUSING SITE IN THE URBAN AREA: We have little information on most of these sites, and no reason to raise wildlife issues with most. SHLAA 0916 Grange Hill Farm. Development here would increase visitor pressure on Grange Hill (and possibly impact on its amenity value). A development levy would be needed to raise money, to be ring-fenced for management on Grange Hill in perpetuity. I have co-ordinated this response on behalf of members of Wirral Wildlife.</p> <p>I was informed that Halton Borough have had their Local Plan knocked back by Natural England for insufficient information on the Functionally Linked land, including lack of bird surveys. You may like to talk to Halton colleagues to get some more detail. Obviously the Wirral WeBS areas are well-counted, but some patches of land have been reported to us (reliably) as housing wintering birds which are not WeBS areas.Prenton Dell LWS got missed off the consultation documents SP030, so was not noted to be protected. This needs correction as Wirral Wildlife are currently negotiating with National Grid over setting up a management agreement with Cheshire WT.</p> <p>[Attached is a survey of birds in Barnston produced on behalf of the Barnston Conservation Society. The survey identifies a number of species which are on the red and amber list of birds of conservation concern. The survey concludes that the release of land from the green belt for development would have the effect of creating isolated patches of habitat for wildlife meaning species will have difficulty in moving from one area to another, creating an unstable ecosystem. The survey states that Wirral is lucky to have such green spaces for wildlife and to lose them would be a travesty both to wildlife and future generations of Wirral residents].</p>

DOR REF	RESPONSE
DOR00342	<p>Mersey Road Focus Group fully support the objections and comments made in the letters of 19th October 2018, addressed to the Council Leader and copied to our ward Councillor and of this same letter but dated 23rd October 2018 [Information provided]. This is because these sites are ALL IN THE CONSULTATION DISTANCE OF the MAJOR HAZARD which is Tranmere Oil Terminal, an Upper Tier COMAH site, subject to the Control of Major Accidents Hazards Regulations 2015 (previously COMAH Regs 2006; 1999) and unlikely to be decommissioned and neutralised within the next 11-15 years. Mersey Road Focus Group also supports the request for Tree Preservation Orders on the trees bordering the sites listed above and authorise our Secretary to represent us in the matters listed in this document.</p> <p>Mersey Road Focus group also wish to be contacted or copied into any correspondence regarding the proposed housing allocation sites, listed above, and any correspondence regarding any road safety improvements in this area, including the hazardous corner, where Mersey Road meets Bedford Place at a 90 degree angle, and the unmarked junction where Bedford Road meets Mersey Road and Mersey Lane</p> <p>A previous letter emailed on 11th February 2018 to the Council Leader and copied to a number of Councillors and Officers from Wirral Council requesting the removal from an auction of 14th February 2018 of the sites SHLAA 1418 (land at Bedford Place) and SHLAA 2049 (Urban Greenspace) and presenting reasons for this request shall also be emailed separately. We are pleased that this appeal was successful.</p> <p>Regarding a request and justification for Tree Preservation Orders, motion sensitive light and CCTV cameras and local road safety signage we shall write separately. We are writing to alert you to what must surely be an ERROR or OVERSIGHT in Wirral Council's Local Plan Development Options Review of Proposed Housing Allocations September 2018 in including the site references SHLAA 1249, SHLAA 1250, SHLAA 1418, SHLAA 2049 and SHLAA 3034 in the proposed housing allocation plan so we are requesting that Wirral Council remove these sites from their Local Plan. Development in these areas would not only put new residents at risk of harm but also put existing residents at increased risk of harm. SHLAA 1249. It is clearly unsuitable for development and also has two beautiful ancient trees in its far corner, which should have preservation orders for their protection if they have not already been listed. SHLAA 1250. This is a landlocked site, having no vehicular access other than the narrow passageways at Bedford Road and Mersey Road and has been a community open greenspace for decades. It is the only local enclosed greenspace that is a safe place for local children to play, ride their bikes, play ball games etc. being overlooked by all the rear upstairs windows of the houses on the north side Bedford Road and the rear upstairs of most houses in Mersey Road, and more recently by the rear upstairs of houses on Russell Road, and is not next to a major road like the playground beside the New Chester Road. Members of the local community use it frequently in good weather to sit out etc. so it functions also as a community garden. Houses on Bedford Road and those on Mersey Road have just very small yards, or in a few cases on the south side of Bedford Road just tiny gardens, unsuitable for healthy recreational purposes. As a community greenspace it is vital to the health and wellbeing of the local community SHLAA 1418. A community petition and many letters of objection and with repeated requests for Wirral Council to consult with The Health and Safety Executive resulted in a recommendation for refusal. SHLAA 2049 north of 91 Russell Road is a thicket of shrubs and mature trees. These trees, so lovely, particularly now in Autumn, should also be subject to preservation orders. SHLAA 3034. An unlawful land grab of almost half of the adjacent site SHLAA1250 (the local community enclosed green space) was attempted on 18th April 2016 by an unauthorised bulldozer. Alerted by councillor, this attempt was thwarted by officers from Wirral Council, who told those responsible to replace the bulldozed land. Unfortunately they did this together with so much building rubble that the Council mower could no longer cut the grass in that area. The local community is hoping in the future to make a wild flower meadow in that part of the enclosed community greenspace. A community petition detailing the many objections to this application and signed by 70 people from 48 different local households was both delivered by email and presented by Councillor. A further copy of this petition can be emailed to Wirral Council as most of the local community's objections apply to all the sites that are the subject of this letter. We do not propose to trouble our neighbours with yet another petition raising the same objections so soon after the one last year. SHLAA 1249, SHLAA 1250, SHLAA 1418, SHLAA 2049 and SHLAA 3034 as Category 3 sites meaning possibly suitable for housing allocation in the next eleven to fifteen years. However it is extremely UNLIKELY that the massive storage tanks and pipelines of Tranmere Oil Terminal will be both DECOMMISSIONED and NEUTRALISED within that time scale.</p> <p>Please do not be complacent about these matters. There was a terrible fire on 13 April 2010 at Campbelltown Road that caused the closure of the RockFerry/New Ferry by-pass, and which caused traffic to be gridlocked on the New Chester Road. Evacuation of local residents may have proved impossible if the fire had escalated and spread to the major hazard and if evacuation was necessary, although the only emergency advice we have ever been made aware of is "GO IN, STAY IN AND TUNE IN", which is hardly a plan.</p> <p>Also this year there was a large fire at the edge of the sites called SCLAA 3034 and SHLAA1418. This particular site had been used to store a number of old caravans, old vehicles, tyres etc. and regularly and persistently the smoke from toxic fires that smelled of burning rubber would emanate from this site. We understand that a number of local people reported this to Environmental Health. Due to prevailing westerly winds this black acrid smoke used to blow in an easterly direction i.e. towards residents on Mersey Road, the River Mersey and the Oil Terminal. However since the larger fire of March 17th 2018, when the wind happened to be blowing from the east i.e. in a westerly direction towards the New Chester Road, this use and practice has completely stopped and there has just been a white van parked there, much to the relief of local residents. This site may have become contaminated by the aforementioned uses, which occurred at regular intervals between April 2016 and 17th March 2018.</p>

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	<p>Wirral Council has chosen NOT to provide Bedford Place with street lighting for many decades meaning it has often been used by fly-tippers. This could easily be remedied by the provision of street lighting and CCTV cameras. The site called SHLAA 1418 at Bedford Place could be developed as a community garden and similarly equipped. A request for funding to help transform this area into a place of natural beauty might be made to the owners and/or operators of the major hazard. It is already bordered by beautiful trees.(i) SHLAA 1671 is listed as 156-162 Bedford Place. This is incorrect. It is actually on Bedford Road.(ii)SHLAA 0483 13 Green Lane (Scrapyard) This site is likely to be contaminated with explosive and toxic underground gases, hydrocarbons, heavy metals and a cocktail of chemicals from its use as a vehicle disposal unit and would require extensive site remediation before it could ever be fit for human habitation and at a cost that might exceed its value for housing. While we understand that Wirral Council wants to preserve as much of its green belt as possible it should not be at the expense of potential harm to residents on its industrialised, highly populated eastern side.</p>
DOR00343	<p>Response from Cheshire West and Chester Council</p> <p>The Council remains concerned about the potential impact Green Belt release might have for the purposes of the Green Belt in preventing neighbouring towns in Wirral and Cheshire West and Chester, from merging into one another, as well as the wider purposes of checking the unrestricted sprawl of large built-up areas and supporting regeneration across the sub-region. In particular, given the nature of employment development around Ellesmere Port, the proportionate release of Green Belt in Wirral should not affect regeneration of this area.</p> <p>Generally, Cheshire West and Chester Council has some concerns with regard to the release of Green Belt land that could have the potential to undermine the purposes of including land in the Green Belt, including preventing neighbouring towns from merging into one another, safeguarding the countryside from encroachment and checking the unrestricted sprawl of large built up areas. We would highlight in particular the assessment of parcels SP050 (West of Rivacre Road, Eastham) and SP051 (East of Rivacre Road, Eastham) and their subsequent identification for further investigation. It should be noted that West Road in Hooton Park, is the north- western settlement boundary for Ellesmere Port (as defined in the Local Plan (Part Two)), and as such, the removal of these parcels from the Green Belt would appear to potentially harm the key purpose of preventing neighbouring towns from merging into one another. Cheshire West and Chester Council notes that parcels SP050 and SP051 are identified with dwelling capacities of 395-592 and 253-380 respectively, and includes commentary which states that they may also be suitable for employment uses. The Council is concerned that these parcels may not be suitable for housing development, given their proximity to COMAH installations and neighbouring employment uses located within Hooton Park. This area is identified as a strategic employment location in policies and the Council is mindful that introducing housing into a predominately industrial area may constrain its strategic employment allocations from coming forward.</p> <p>It is also unclear, with reference to the 'Wirral Employment Land and Premises Study Update' what the justification would be for the use of Green Belt land to provide for additional employment land over and above the proposed allocations.</p> <p>The Council also notes that the some parcels, for example SP046 and SP049, are assessed as reducing the physical separation between Eastham in Wirral and Willaston, Hooton and Ellesmere Port in Cheshire West and Chester, however they are recommended for further investigation. Whereas, other parcels (for example, SP072-74, SP085-89 and SP0106), which are also assessed as reducing the physical separation between settlements in Wirral and settlements in Cheshire West and Chester (e.g. Parkgate, Neston, Willaston, Gayton) are not taken forward for further investigation.</p> <p>In addition, it should be noted that parcel SP051 does not share a boundary with the M53 motorway. With regard to other Green Belt parcels, the Council supports the assessment of parcels SP072-74, SP079-90 and SP106 and the conclusion not to take these parcels forward for further investigation.</p>
DOR00344	<p>I am writing to make representations on behalf of Taylor Wimpey. These representations relate specifically to Land at Barnston. The majority of the Barnston Road site is included within site Ref SP064E (North of Whitehouse Lane), however, the northern part of the Barnston Road site and a small area in the south-west corner are not included within WBC's red line. WBC should amend site SP064E to reflect the entire Barnston Road site as it forms a logical and appropriate amendment to the Green Belt boundary and should allocate the Barnston Road site for housing in the Local Plan. The justification for this is set out and in the previously submitted Development Statement. When tested against the purposes of the Green Belt, the site presents a significant opportunity to support a sensitive residential development that will not prevent the green Belt from functioning effectively in this location. In summary, these representations have demonstrated that, regardless of the housing requirement figures that are arrived at, exceptional circumstances exist to justify the removal of the site at Barnston road from the Green Belt to contribute to meeting Wirral's housing need. As demonstrated in both these representations and previous representations made by Taylor Wimpey in relation to land at Barnston Road, the site is in a highly sustainable location and represents a natural and logical extension to the existing urban area. Furthermore, the site is available, suitable and achievable and there are no known technical or environmental constraints that would preclude the development of the site. Furthermore, WBC's own Green Belt Review assesses a wider parcel of green Belt land (RefSP064) rather than the Barnston Road site itself. No reason is identified why the wider strategic parcel identified would not be suitable and appropriate for release for new housing development. The Barnston Road site is therefore suitable and appropriate for Green Belt release for housing and should therefore be allocated for residential development in the Wirral Local Plan either in its own context, as part of a wider strategic allocation.</p> <p>[Representations and associated appendices attached]</p>
DOR00345	<p>Respondent would like Epi-Chem and Slack Wood recognised and in need of protection on grounds on nature conservation, trees and archaeology. Minor errors noted at:</p> <ul style="list-style-type: none"> ● 068404 Allport Lane is in Clatterbridge Ward not Bromborough; ● Acre Lane School is in Eastham Ward not Bromborough.

DOR REF	RESPONSE
DOR00346	<p>I suggest that local communities on the Wirral should bear this in mind and look very, very, closely when the council leader claims he has ‘no choice’ but to build many thousands of houses on the Green Belt. If you persevere with this paper, by the end, you will be able to decide whether this is true. The first point is that the council’s own and the government’s housing forecasts are based on data and optimistic assumptions that are up to 6 years old...and things, you may have noticed, have changed for the worse in Britain. The second point is that the council itself has identified 91 brown field sites on which 2,400 houses could be built. There is more to consider. Peel Holdings have permission to build 13,000 dwellings at Wirral waters. They have said that at least 2,900 can be delivered in the 15 year plan. Up to 6,450 maximum could be delivered, subject to state investment in essential infrastructure. So despite having granted planning permission already for ~ 16,000 dwellings, mainly on brown field sites, the Council has decided to seek out landowners and developers ready to ‘release’ Green Belt land parcels for housing development. This has led to over 100 sites being found and 50 sites being targeted for closer consideration. (Figure 4). This GB parcel land amounts to ~8 square miles of Wirral countryside. Both government and council have ignored the existing ~4,600 empty properties on the Wirral. The government and the ‘land bankers’ such as Peel Holdings have been blamed by the Council for this catastrophic situation. However the Council commissioned Housing Study of 2016 found a housing requirement of 729 to 1,029 units per annum (based on out of date data). In fact the same complex methodology underlies both housing estimates. It is at heart still based on guesswork and produces a remarkably wide range of forecasts. The politicians can find almost any number that suits them politically. In the case of the Council this was a desire to promote their miraculous economic growth policies for Wirral. Given the uncertainties a better approach is to consider actual recent and longer term population and household growth rates and growth rate ranges and base forecasts on these with possible adjustments for general economic growth prospects e.g. Brexit effects. We do that below and find housing build rates of 220 to 370 per annum, not 800. At this level the amount of council Green Belt ‘release plan’ needed (ignoring the brown belt land available) would be only ~6% of the land targeted by the Council for release. Even at 800 homes per annum the fraction of Green Belt ‘release plan’ needed would only be ~17% of the Council GB plan before considering brown field sites and Peel sites. If we prefer to stick to the ‘official government methodology’ and simply put in the latest (May 2018) government sub-national population projections for Wirral we get a need for ~7,100 houses (before using brown field sites) and just 10% of the council GB release plan. But the ONS 2018 household projections release (September 2018) now suggests ~5,900 houses by 2033. The ONS 2018 low economic migration scenarios, scaled to Wirral, suggest ~4,500 houses. How do these need levels compare with the known non-green belt housing potential? The council has identified 91 sites with 2,400 house slots; Peel 2,900 minimum offer at Wirral Waters; 3,570 recovery from empty housing at current council recovery rates, yielding in total 8,870 houses on non-green belt land. A fraction of this total will meet the latest ‘official’ government housing needs projections. NO green belt land is needed at all.</p> <p>We will however look below at all the government housing needs scenarios from the out of date 12,000 to the low migration 4,500 under various assumptions about non-green belt land availability. Even in the worst case scenarios very little green belt land release would be needed. The local press reports the Council's new 'close to 500' houses per annum and hence a 7,500 houses, 15 year plan target, down from the government obsolete target of 800 houses per annum. This was roughly correct based on population projections released in May 2018. However the Council seems to be ignoring the latest ONS / government household projections. The September 21st 2018 ONS household projections for Wirral suggest a basic 393 houses per annum requirement or ~5,900 over the 15 year plan. (The recent actual net build rate has been 383 h/annum). I submitted the latest figures to the local plan some weeks ago. For certainty I have repeated them here and in the updated attached housing needs analysis paper. However this 5,900 requirement is still based on a fantasy economic migration into Wirral over the plan period, totally at odds with real history. The ONS also provides new (post Brexit) low economic migration scenarios for the UK. If we scale the Wirral housing requirements appropriately we get ~4,500 in total or 299 houses per annum. To put these new forecasts into perspective we can add in 2,400 brown field slots identified by the Council; a 2,900 minimum offer from Peel; 3,570 houses over 15 years (at the current council recovery rate of 238 empty houses per annum) and in total 8,870 non-green belt house places. This compares with the new government / ONS ~5,900 'target' and the new ONS low economic migration scenario of ~4,500. Only a fraction of the available non-green belt housing potential is needed. Scaling up by a small 'affordability uplift' factor makes no difference. The certain bottom line is NO WIRRAL GREEN BELT LAND NEED BE RELEASED AT ALL. [Forecasts attached as Appendix 1-3]</p> <p>Any attempts to ‘uplift’ this number based on now mythical economic growth scenarios, or affordability factors, or the later release of ‘pent up’ demand in certain age groups, will not be credible in the light of recent government economic forecasts. Indeed the credibility of the government housing needs methodology will now come under close scrutiny. I should also tell you that the latest population forecast growth to 2033 relies entirely on a large net migration into Wirral which your own consultants questioned in 2016. I expect the newly released numbers to be further challenged and actual Wirral future housing needs forecasts will be lower still (~4,400 based on current trends).</p> <p>The housing implications are obvious. Some weeks ago I submitted an analysis to the public consultation which was also widely published. I enclose a copy. It works through several housing scenarios using brown field, Peel offers and empty house recovery assumptions for the 12,000 houses target and for that target simply scaled down by the changed population forecast (i.e. 7,100 houses). You can see that very little of your 4,900 acres proposed GB parcel release plan would be required. This land could support 71,000 houses. With the new government household growth forecasts the 15 year plan period housing needs drop to ~5,900. The effects of this are shown in the second document enclosed. Under most scenarios NO green belt land needs be used at all to meet housing needs. At most it would be a few percent of your 4,900 acre GB parcel release plan. The ‘plan’ is totally spurious and unjustified by the ‘official’ data.</p> <p>In these circumstances I suggest the public consultation should be halted until the council makes the new housing need numbers clear to all Wirral residents and compares them honestly with your GB release plan proposals which in principle could accommodate 71,000 houses. It is not good enough for [council officer] to tell public consultation meetings that the numbers will be looked at in camera, by a council appointed ‘expert’, ‘some time’ in the future. Alternatively the GB release plan could be withdrawn now before formal challenges to it emerge.</p>

DOR REF	RESPONSE
DOR00347	<p>An updated report (dated November) of DOR00346a with 2 additional appendices (4 and 5) is attached</p> <p>"NO" to development of Column Road fields and Caldý Woods Support this petition to say NO to development of the beautiful area of greenbelt between Column Rd, Caldý Rd and Boundary Road (including Caldý Woods and Column Road fields.) 'Paving paradise' -A far reaching impact on the character of West Wirral We believe that there is a very real risk that the fundamental character of the Wirral will be altered by overdevelopment. As rightly identified in proposed scoring criteria by the council there is relatively little (if any) green belt development that would not create a completely contiguous urban development. By allowing construction in this area there would be continuous building from the Centre of West Kirby to Thurstaston and Caldý, and also extending up Montgomery Hill to Frankby. In addition, walkers on Thurstaston Common and Montgomery Hill together with motorists travelling from Heswall to West Kirby through Thurstaston gap would see housing rather than the open aspect and woodland currently seen. The impact of this growing urbanization on the wellbeing and mental health of the population of Wirral is not to be underestimated. It will have a significant effect on reducing the attractiveness of the Wirral as a leisure destination with concurrent economic impacts. It is easy to look at 2 dimensional maps and claim that common land is not impinged upon, but the reality is that the experience and character of the Wirral is in danger of being irrevocably defiled.</p> <p>Biodiversity impact: This area of fields and woodland provides nesting and roosting habitat for several endangered/protected species, notably barn owls and bats together with other species such as woodpeckers, badgers and hedgehogs. Furthermore, it is immediately adjacent to a wetland habitat and Canadian geese and ducks frequent the fields during breeding and migration. Agricultural land provides an important hunting area for barn owls and the Barn Owl Trust has linked declining populations with loss of agricultural land. Given that there are only 26 breeding pairs of barn owls in the Wirral and Cheshire, attention should be paid to this precarious decline, in particular the loss of hunting grounds and nesting sites.</p> <p>Barn Owls are legally protected by the Wildlife and Countryside Act 1981. This area of public woodland and agricultural land provides nesting, roosting and hunting grounds for this beautiful and endangered bird which can be seen occasionally and heard frequently at dusk and at night. This area in addition has a population of woodpeckers and of bats (bats being a European protected species) and is frequented by flocks of migrating Canadian geese. This proposal is contrary to the National Planning Framework. Development of this land would contravene several of the basic purposes of greenbelt as stated by the government: checking sprawl of built up areas; prevention of merging of neighbouring towns; safeguarding the countryside from encroachment.</p> <p>The National Planning Framework puts great emphasis on the importance of biodiversity and nature conservation and retention of the character of the landscape. And yet, this area of land with its ENDANGERED and PROTECTED species is one of many proposed "parcels" of greenbelt which Wirral Government is considering sacrificing for development (in this case for executive homes)."NO" to developing Wirral's Greenbelt "YES" to preserve biodiversity and nature and SAVE the beautiful ENDANGERED barn owl[Individual comments from petitioners hereunder]Green space is precious. Once gone it will not return; I lived in West Kirby all my life and until recently. It's a great attraction for walkers and visitors to our area .Also the wild life etc. .There must be somewhere else to build; There is no need for any such development of these greenbelt sites as there has been no population increase on the Wirral; A beautiful place shouldn't be spoilt! My sister walks her dogs here; We need to protect our Wirral Greenbelt from unnecessary development, especially when there are still brownfield sites available; This is so wrong on so many levels and must not happen; Enough of expensive developments that benefit a small clique of rich people at the expense of the many who currently enjoy these dwindling green spaces. Once we lose these spaces we'll never get them back; Green and crown Land has been there for so many years, is there for people to enjoy and should not be taken away. !!!; People and wildlife need these green spaces!; The natural ecosystem of the Wirral would be ruined by this development; This needs to be kept green; We need to conserve every green area we have; We desperately need to protect our Green belt areas; Caldý should remain natural & unspoilt. It's a beautiful character full village and should remain this remain this way. We do not want any more buildings, extra noise & pollution; Don't need any more executive homes, cheaper affordable homes needed more I want to save our greenbelt; Do not want this greenbelt land to be used for this; The council is already charging to access the country parks via parking tariffs. Removing more open land is wrong. The unique nature of the WIRRAL comes from its green spaces. There are plenty of brownfield sites to use first; Brown belt first, there are plenty of other spaces which should be used, which would actually make those area look better. We need green spaces for physical and mental wellbeing; It is so very important to keep greenbelts green-more and more is now known how vital the countryside is needed for both our mental and physical health; We have to keep our green belts, not turn it over to fat cats building houses; people need open spaces for their physical and mental health. The people of Wirral don't want to lose their greenbelt land; I'd rather see greenery than housing developments, what a shame it would be to lose that; The countryside is fast disappearing and once it has gone it has gone forever. It would be far better to develop brown sites and inner city sites, loads of empty prope1ty but developers are not interested; We need to protect our beautiful green space; it's what makes the Wirral The Wirral, it is a shameful waste when other brown land could be used. Oh sill me it's for 'executive housing' that explains everything; We need our green belt; it shouldn't be used unless there is no alternative. It ce1tainly shouldn't be used for executive homes; Once the green belt has gone there's no going back. We need to treasure it for future generations; I am totally against building on any green belt land as there are plenty of brown field sites unused around Wirral; This land is valuable for wildlife; Regular walker around this area, would rather it stayed as is; Greenbelt is supposedly protected and yet it these areas are still disappearing at an alarming rate. Brownfield sites are being overlooked because of high pre-development costs in favour of these areas; The Greenbelt is precious and yet it's still disappearing at an alarming rate; Our green space is important for so many reasons; This is a beautiful area of woodland affording huge pleasure to visitors & residents; Fantastic wildlife habitat. Its loss would be a tragedy!; We cannot afford to lose Green Belt land. Once gone we can never recover that open space, for walkers, farming, and wildlife. It is intrinsic to the Wirral. We live in a very special place and continuous building will spoil beauty of the... Read more ;Just not acceptable, save green belt save a quality of environment. Leave the green belt</p>

DOR REF	RESPONSE
	<p>alone!; I'm hoping for once a politician might actually listen to the people that live in this area; (Democracy not dictatorship, apparently) and not destroy more wildlife and 'greenbelt' Land (the word greenbelt suggesting it is already.. Read more; Oh my goodness! No. The Wirral was a lovely place to grow up - please keep it that way. Please protect your wildlife and your green, clean spaces; The Wirral is already over-developed, there are plenty of other areas further afield that could be utilised; I'm signing because of all the reasons given in the document. So much of what brings people to live and work in the Wirral has been lost already - it must stop; It would destroy the wildlife. We don't need new housing! This would ruin the lovely countryside feel we have along with our beautiful views!!!; We cannot destroy the binding glue, the green spaces of our communities which are so important to the population and the landscape of Wirral. We cannot have indiscriminate building and must learn from the mistakes of other... Read more Habitat for different species is vitally important; It's important to keep such areas free from over development; This is ridiculous, me my parents and my grandparents and their parents have walked and enjoyed this lovely space for generations. This doesn't need development. Go and develop Carr lane or Moreton fields where Read more; I strongly feel we should protect our green belt and the rural character of Wirral. I believe in; Why ! There is absolutely no need to use this land for houses, greedy developers just want to make a fast buck, this has got nothing to do with affordable housing for the masses these would be luxury homes to make money, end of! The local council housing suggestions are just becoming a joke. There are brownfield options that can be developed, but more importantly there is no infrastructure in place. Schools, Dr surgeries, hospitals; Green spaces are what make Wirral a pleasant place to live keep some bits of Wirral nature is disappearing to fast. They need to build on condemned, building sites instead. I believe in green space. It's what The Wirral is about. The leisure peninsula; Leave our green belt for future generations Greenbelt is precious; There are plenty of brownfield sites to be built on in Wirral!. There's no need to ruin our countryside ;I am totally against building on any greenbelt land. Once it is gone - it is gone forever !!; We need to protect Green Belt - this is the easiest option not the best option; Save green belt for future generations. Build on industrial wasteland instead, regenerate poor areas of disused factories etc.; I believe in the green belt; We need green belt land to stop concreting over pleasant places to walk. Plenty of brownfield sites on the Wirral; My son lives on the Wirral and it is beautiful. We need natural green spaces for all to enjoy; That area is close to my heart, I spend a lot of my time there, please don't spoil it. Protect the wildlife - simply as that; I want to protect wildlife; We need to keep our green spaces not only for humans but more importantly for wildlife. The increase of houses will have a huge impact on the whole area. The roads are struggling to cope with the amount of traffic.</p> <p>We have already lost a large piece of green belt land to the fire station. This has to stop now or there will be no green land for our children future and the next generation; There is plenty of land, brown land to develop; Brown sites must be used not areas like this; Our green belt is precious and needs to be saved for future generations; This is a beautiful area where I've spent happy time with children and now grandchildren. Once developers start chipping away at they will go on and on demanding more; horrified that our lovely Wirral could be built on! Make peel holdings build on their land and force a compulsory sale! He reason people love the Wirral is for our lovely countryside!; All of Wirral's Green belt must be fought for. Wirral residents must protest together. Find out what is going on in our council and expose the corruption or the incompetency that has led to this affair; The Wirral green belt land is worth far more as a beautiful, green landscape than it ever will as housing. Don't let money take a precedent over natural beauty; Building on green belt areas cannot be allowed. There are many brown field sites on Wirral that would benefit from being developed; The proposed development will forever adversely alter the character of the area in question to the detriment of not only the immediate residents but those of us who enjoy the open spaces you plan destroying; I'm signing this because we need to stop the infiltration into our greenbelt land - we have little enough of it as it is and it will devastate our wildlife, insect population and our own quiet spaces; I oppose the development of green belt land. There is no need for this sort of development; Please don't spoil this beautiful area! You will spoil Wirral forever. Let's have something we can be proud of for God's sake!!!;This is an entirely unnecessary use of wild land when there are plenty of brown field and current housing areas which would benefit from regeneration and affordable housing. Any housing placed on the column road fields... Read more; Green belt is essential to our wildlife and wellbeing Leave our green spaces alone!!!;Reactive, ill thought out decision that will blight our neighbourhood and destroy beautiful areas that make this area what it is; This is shocking! Leave our gorgeous fields/woods alone; Enough is enough; It is not just about this area the whole of the Green Belt must be protected. IF we give in to developers then we have a massive urban sprawl that will ruin the character of the Wirral peninsula forever. This will mean that future; The Wirral has lots of derelict brownfield sites which should be utilised completely before any Greenfield area is considered; The woodlands were a gift to the community and we destroy enough trees. Infra- structure plans for schools, medical facilities... haven't heard about any!; NO STOP THIS. IT'S BROWNFIELD FIRST.; It is inconceivable that these precious woods should be disturbed especially for luxury homes which are not needed in this area !; Great views, peaceful and priceless amenity value from the woods. Some other facts, family sizes are much smaller than ever before, most people have either 1 or 2 kids that are if they ever even have kids. Demographically though... Read more; We need to retain our green belt for future generations; Greenbelt land is habitat for our ever diminishing wild life and for families to enjoy. Not for greedy developers. There are plenty of brownfield sites in Birkenhead and elsewhere; Backhanders and corruption within... Read more; Green Spaces should never be built on. Find another way.;</p> <p>Our green spaces are very much part of Merseyside's charm, we should not be touching them with development until there is not one ounce of brown field left; There aren't the schools, there aren't the doctors (I already have to wait 4 weeks to see my GP) - there aren't the roads. What there are trees and green spaces - the lungs of the land - are these people trying to suffocate Wirral?; Barn Owls hunt on this land and we only have a few breeding pairs left on the Wirral. It could be devastating to the growth of the population let alone the impact it will have on other species resident in the woods and the... Read more; This is a beautiful part of west Kirby that is used daily by a lot of people. Stop ruining our green areas. Once they are gone they are gone forever; It is an area of natural beauty that needs to be kept as it is; Research tells us that green spaces are crucial to the mental and physical health of the local community. We have to maintain the right ratios to optimise this; Green land is precious and a rarity; I want to keep this beautiful green belt land. It is a small oasis for walkers, runners and nature.; We live in Liverpool city centre and often pop over</p>

DOR REF	RESPONSE
	<p>to Thurston for some much needed walks in green space and fresh air; I DON'T LIVE ON THE WIRRAL BUT I AM SICK OF THIS DESTRUCTION OF WHAT FEW GREEN SPACES OUR COUNTRY HAS! BAD FOR PEOPLE, BAD FOR WILDLIFE BAD FOR THE ENVIRONMENT. ALL OVER THE</p> <p>Read more; Green belt needs to be saved, everywhere; That piece of farmland is a joy to see; in all seasons - it uplifts the heart whether you are a walker, runner, cyclist or motorist driving past. To "fill it in" with housing would be a sin; The Wirral is full up, we would like to move back but not if you ruin it like this?; According to the ONS there is more than a possibility that the need for Housing Development will be reviewed soon. Maybe over developed! Surprise! Keep alert to this issue; Wirral needs more social housing in areas close places of work, not "executive homes" on prime green belt. The Council should not be dangling carrots for greedy property companies to snap up. I'm smelling corruption here; This is ridiculous! This land is very valuable as farm land giving space to the houses it surrounds. Filling in these spaces will lead to a carpet of suburbia without character. The value of living on the Wirral is the shape and... Read more; We are down to 59% food sustainability in the UK. Most of our... Read more; Protecting greenbelt land is not only about preserving the beauty, it's also vital for helping the environment, providing habitats for wildlife, and keeping the plants and trees to make a contribution to tackling global warming; We have to conserve the beautiful open spaces in the Wirral for future generations to appreciate, learn from and enjoy, just as generations before us have; Too many of our green spaces are being lost and we need these simply to continue to exist on this planet; This is a beautiful corner of the Wirral and a very important area for wildlife with abundant owls, bats and many other important species; I value green space; We have much brownfield land on the Wirral, much of which is being held by Developers. They should be forced to develop rather than irrevocably lose our Greenbelt, which would seriously impact Wirral for residents and visitors alike</p>
DOR00348	<p>I am strongly opposed to Wirral Borough Council's proposal to build on Greenbelt sites. Attached are 2 letters that I have submitted to the 'Local Plan' site. I attended one of the consultation meetings recently and was disappointed in the lack of imagination shown by the council planners. Obviously building on greenbelt site is the easiest and cheapest (and most lucrative) option for the council, but it displays a disregard for the borough and contempt for its population. The presentation seemed to ignore sensible solutions such as the Wirral Waters development and redeveloping empty properties and push its own agenda of destroying greenbelt to build, in many cases, executive homes to financially benefit the landowners (and councillors?).</p> <p>Firstly, the figure of 12000 new homes to be built in an area of declining population needs to be comprehensively challenged and clarified. Where is the independent analysis of this figure? New developments that are required can easily be absorbed by redeveloping brownfield sites: 1. 4-6000 empty properties – why not redevelop them, penalise landlords who keep the properties empty or adopt a £1 ownership scheme - similar to Liverpool's - to create new communities and affordable housing. 2. Redevelop the rows of derelict shops and businesses across Wirral. Clearly the high street has changed and there will be fewer shops in the future so why not redefine the use of these properties to become homes. 3. Many large homes are often occupied by single elderly people. The council could encourage elderly people to share their property with a younger person who would provide company and act as a helper/carer - and benefit from discounted rent (they do this in Germany). Alternatively, if the council built small premises designed specifically for elderly people's needs in pleasant communities and encouraged people to move to them it could free up thousands of family homes. I live in the historic village of Irby. According to the Oxford dictionary the definition of a village is 'A self-contained district or community within a town or city, regarded as having features characteristic of village life.' Irby is currently distinct from the villages of Thingwall and Pensby. According to your presentation, among the 5 purposes of the green belt as set out in National policy are included: To check the unrestricted sprawl of large built-up areas Prevent neighbouring towns merging into one another Assist in safeguarding the countryside from encroachment Preserve the setting and special character of historic towns The decision to effectively merge Irby with Thingwall and Pensby seems to contradict both the definition of 'village' and the values of the green belt national policy. By the way, the definition of 'council' is 'a group of people elected or chosen to make decisions to represent a particular group of people' - so, apart from greedy landowners and councillors, are these plans really representing the wishes of the people of Wirral?</p>
DOR00349	<p>I have looked through the information that you kindly directed me to but sadly it falls short of the type of information I was asking for access to. I may not have made myself clear, for which I apologise. The information you provided, unless I missed the point, was a treatise and history on how the council set up and handled its assets. What I'm trying to access is far more specific to Bromborough carpark. The information you tendered seemed to suggest no more than the idea 'We own it, so we can sell it and that's why it's on the Local Plan'. What I'm hoping for is that behind that initial qualification there is a further, in-depth study that has been undertaken which seriously evaluates the importance, or otherwise, of the carpark not just to the council in sale value, but to the Bromborough community in jobs, welfare and services. I would hope, for example, that there is a monitored record of usage of the carpark, vehicle numbers at different times of the day, users reasons for using the carpark and what alternative plans exist to support the Bromborough community should it no longer be there. There are many carparks owned by Wirral Borough Council which have not been earmarked for sale or development, what has made Bromborough a target for redevelopment whilst they remain untouched?</p> <p>I hope that this time I've expressed my interests with greater clarity and that you might be able to help me access the data should it be available. I am asking for this access not only as an individual but also on behalf of Bromborough Village Community Association. Rightly or wrongly we view ourselves as a partner of the Council through the voluntary work we undertake on behalf of them. Many of the tasks in the village we are involved with were previously performed by the Council but are now done by us, at our expense, no longer theirs. Our interests in the future of Bromborough are therefore very real and I hope there is enough respect and understanding between us to afford us some further help in this matter.</p> <p>This is a free car park so there is no income and I don't have any information on usage other than casual observations made when in the area and the car park looks quite well used. This is not a site I have identified as surplus due to low usage so I don't know how / who added it to the list.</p>

DOR REF	RESPONSE
DOR00350	<p>Please add this information to my formal objection against the release of the green belt status of SP019B and SP019 Limbo lane Plantation Irby The land at SP019B and SP019 is a massive open space which is an aesthetically stunning panoramic vista and viewed by anyone passing to or from Irby Village or on the public footpaths and bridleways to and from Arrowe Park.</p> <ul style="list-style-type: none"> • Development on this site would be visible across a wide area. • Development would compromise the openness of the Green Belt in this location • Development would be a clear intrusion into open countryside, without substantial boundaries with which it could be contained. It is also enjoyed by many people for purposes of recreational activities horse riding, rambling (including a walking party arranged from the local doctors surgery) dog walkers etc. It provides economic prosperity not only for the farmers that grow crops on the land but also supports the wealth of the local horse community as people choose to keep their horses in Irby to enjoy riding through these areas. In turn the yard owners, farmers, local liveries and tack and feed shops also prosper. If you take away the green belt you will take away income from all of these people. There are more horse per head on the Wirral than anywhere else in the UK. That is because we have the green belt. Wildlife, I have previously documented the variety of species that live in this area including greater crested newts, foxes, pheasants rabbits hedgehogs and bats. • The open space provides a multitude of public benefits, ecosystem services, and products we all need and enjoy such as water, economic prosperity, wildlife, recreation, and wildfire protection. <p>Urban sprawl or suburban sprawl describes the expansion of human populations away from central urban areas into low-density, mono-functional and usually car-dependent communities. Irby is situated many miles from the central urban area of Birkenhead and most people living in this area are car dependent. Low density residential zones" are locations intended for housing that include a lot of open space. These zones are meant for a small number of residential homes, and exclude large industries, apartment complexes, and other large structures This is Irby, we have a small population, a small number of residential homes, no large structures or industries. A relatively remote rural area which is very sensitive to changes in built development, particularly given its role as part of the setting for village of Irby. The land has extensive long-distance views. Green Belt policy provides robust protection for this open character, and maintenance of the current settlement. Part of the open countryside to the side of Arrowe Park which is of a pastoral/woodland character. Irby is a small village and the special setting and character of the village would not remain if the green belt land at these parcels were to be removed. You need to utilise the brownfield sites already available, the derelict houses and other areas in Birkenhead before even considering releasing any green belt land for development. You will fundamentally change the nature of the community of Irby as you have targeted these fields and will remove the cherished green space between the towns/villages of Thingwall and Irby and Irby and Greasby. (Please also see enclosed document page 77 onwards regarding your own previous assessment of the suitability of this land for release of green belt status). It is NOT SUITABLE FOR RELEASE</p> <p>Pre installation surveys along Arrowe Brook will be undertaken. If an otter site is confirmed and will be directly affected by the installation a licence will be required and a new site created prior to installation. If an otter site is located within 150m of the installation there is the potential for disturbance. Mitigation measures such as screening and directional lighting can be used to minimise disturbance and a licence may be required. Brown Hare - The habitats which are within the cable route corridor are considered suitable for these species. As required additional mitigation measures will put in place to reduce disturbance and prevent harm including use of directional lighting, secure storage of any installation materials and provision of a means of exit from excavations.</p> <p>None: Barn Owl Grass Snake</p> <p>Badger -The woodland within Arrowe Park and within the Lower Heath Wood SBI has the potential to contain badger. No setts have been identified. Pre installation surveys will be undertaken prior to installation. If a badger sett is identified within 30m of the installation corridor a licence will need to be obtained in advance of undertaking works. Providing mitigation no significant effects are predicted.</p> <p>Temporary and/or permanent loss of habitat including potential destruction of nests and disturbance of breeding and non-breeding birds.</p> <p>Breeding Birds - Vegetation clearance will be undertaken outside of the breeding bird season or hedgerows netted to prevent nesting. This will prevent disturbance within the installation corridor. During the installation there is the potential for temporary disturbance to nearby bird territories in habitats immediately adjacent to the cable route from noise, artificial light, movement of heavy plant and installation activities such as site clearance and digging. Screening will be installed around the working area and directional lighting will be used to minimise disturbance if works are undertaken within the breeding season. No significant effects are predicted. Non-breeding birds N/A</p>
DOR00351	same as DOR00177
DOR00352	<p>We have been recently shocked, and distressed, on seeing the reports regarding plans that Wirral Council are considering for the sale of Green Belt Land for the building of houses. The plans for the Barnston and Thingwall area are ludicrous. The infrastructure is just not there. We have been led to believe that the Government is not planning on giving any money towards the infrastructure that is going to be needed. If this is true, then these plans cannot be put into place. Most of the 'roads' around the Barnston and Thingwall areas are lanes. They cannot cope with any further traffic. The queues, at the really busy times of the day, are dreadful. You are definitely not looking towards the future, and what kind of life future generations will have. Surely, most of us, would like to leave a legacy, places for recreation for those we leave behind, with plenty of farmland to enable us to be self-sufficient. There is already so much urban sprawl on the Wirral Peninsular. This is to be on your conscience. At this time we don't have any buses coming through Barnston or Heswall Hills, to enable locals to get into Heswall. People have to use a car or call a taxi. Local public transport is not very good, which means more vehicles on the roads. The new houses that are planned in the Heswall, Gayton, Barnston, and Thingwall areas will certainly NOT be in the price range for first time</p>

DOR REF	RESPONSE
	buyers! We believe all the new planning of houses was to enable younger people to get onto the property ladder and give them a home. There are still brown field sites in the North of Wirral, which would enable the first time buyers to find a home. These North Wirral areas have been neglected for a long time and need some immediate attention
DOR00353	<p>The Oaks at Caldý, is located on Column Road Caldý on the south of the Wirral, occupying a south facing position of some 3.6 acres. One acre is of woodland which would continue to be professionally managed during and after the development. There is already a five metre access entrance to the site and highways have no objections or concerns regarding the site or the entrance. The masterplan will incorporate fifteen, five bedroom detached houses. This is low density for recommended development, as pointed out by Wirral's SHLAA study 2010 by [consultant] and Partners, who recognise industry unit densities of 14.5 units per acre. The homes will be Sustainable, eco-friendly and of superior designs will make this development unique on The Wirral, landscaped with native trees and shrubs, in keeping with the local environment. Building will begin as soon as approval is granted the whole development will be completed within two years of planning approval, greatly helping to ease the quality housing shortage in this area. This project is deliverable and highly developable due to its relatively small nature and lack of constraints. It should be placed in the highest category 1, for relevant sites that can be developed and delivered, sustainably and on schedule. Ideal for families, the development is located close to quality primary and secondary schools in West Kirby. Great sports and leisure facilities of marine lake and West Kirby concourse are all within walking distance.</p> <p>There is a post office and shops are all within walking and cycling distance. West Kirby is just under a twenty minute walk away or a five minute drive. The town is a very desirable part of the world to locate to and has many vibrant local shops, restaurants and bars. The site is on the A540 which makes commuting to Birkenhead, Chester Liverpool and beyond extremely convenient. Transport links such as bus stops and the nearby train station in West Kirby make this a short commute to many expanding businesses nearby in Birkenhead, Liverpool and Chester with easy connections to the rest of the country via Limes Street station and the nearby M 53, the perfect location for quality housing. The site is already surrounded by housing on four sides so this is an infill site, which would not affect the openness of the greenbelt. Two buildings already occupy the site. Sensitive landscaping of native hedgerows and screening trees have already been planted and are now establishing themselves. There is a huge demand and lack of supply for quality housing in the U.K at present both nationally and locally. This scheme will bring quality modern sustainable housing to a desirable area which has a shortage of energy efficient eco build homes. We believe therefore that this site should be brought out of greenbelt as a priority as it has no constraints or complications connected to it. The site masterplan is deliverable within a short time frame and would make a most attractive development and enhance the area with much needed, up to date sustainable homes.</p> <p>[Developer's "No Objection" response]</p>
DOR00354	Stop Immigration. Then you won't need houses. Leave Green Belt Alone
DOR00355	<p>As an aside I am amazed business for the area has been done on a "promise" with Peel. Your letter (Dear Occupier) talks of:</p> <ul style="list-style-type: none"> • 'local media' – we sometimes do not get the free press · • 'online' – I don't have a computer • 'attend community events' – I am unable to leave an elderly parent: Mon-Sun from 7:30 a.m. to 8 p.m. · • 'one stop shop' – as above · • 'Library' – as above · • 'Leisure Centre' – as above • Have you a questionnaire for me to complete and return?
DOR00356	<p>I am writing to express my disbelief at the plans for removing Bromborough Library and car park. Are you really planning to kill Bromborough? The library is a community centre which is used often. The express library service has really come into its own. The venue is used by tots and choirs and U3A, Zumba and line dancing, and presumably more than I am aware of. When we have no car park, what will the shopper do? What will the shop keepers do? It seems that Bromborough will really die, as everyone will go over to the Croft. Not all the elderly are able to do this conveniently. And to add insult to injury, you will be removing the only public toilet in the area, as you must be aware that you removed the one in the Rake quite some time ago. Not all shopkeepers will be happy to have all and sundry invading their toilet space. Next there is the problem of doctors and dentists. We are finding it difficult to get an appointment within 3 weeks, that is if we are lucky. Buses have been withdrawn, are they to be re-instated? Transport facilities are not the best. The schools are overflowing, and cannot take more. Utilities? Are all these things being taken into consideration? I would like to add my strong objection to all the others which I expect and hope to be pouring into your office.</p>
DOR00357	<p>May I point out or re-enforce what other members of the public will say about losing our civic centre. Our village recreation facilities which are so well used would impact on so many lives from the very young to senior citizens, we depend on social contact. The library gives us reference material for educational needs plus the leisure side of just reading books. Other libraries might be available elsewhere but travelling costs will limit the availability to Bromborough residents. As for the possible removal of the car park well it makes me wonder how on earth retail shops could survive without customers who travel from the local areas. Can we flood the local streets with cars looking for somewhere to park? Local buses are not always the answer when a person is unable to carry a quantity of heavy shopping. Could this be a Political move to put the blame on the government?</p>

DOR REF	RESPONSE
DOR00358	I am writing about the proposed Bromborough car park and civic centre sites potentially being lost for potential building projects in the future. I truly believe that the loss of the car park will have devastating effects on local businesses in the Village. Customers will struggle to park, which inevitably will drive customers away which will undoubtedly cause shops to close and businesses to fail. The Civic Centre is the hub of the community which houses the Library and the Civic Hall. Losing this will impact many lives in the area, including children, parents and the elderly. I would urge the council to consider the opinions of the local residents as it is them who will truly suffer as a result of losing both the car park and civic centre.
DOR00359	I recently heard the news about Wirral Council plans to release green belt for building on Lever causeway and mount road. I am not a political person neither have I ever contacted the council about anything before, so this email is from a 'normal' member of the community so would hope you take this seriously. I find this absolutely astounding considering the state of other areas of the Wirral that would largely benefit them as opposed to the Bebington area. Levers causeway in particular I use every day to run and to walk my dog along with many others of the community as the views and scenery are among the best in great Britain. If it happens I would like to thank you all in advance for single handily destroying a historic hamlet of the area (Storeton) and for creating the fantastic Wirral peninsula into a housing project just to try and gain extra cash. I consider 'councils' and 'Politicians' to not be with the real world and they make decisions based on not having common sense and this proves my case. raised on a silver spoon and not having any consideration for the normal working class families who cherish the little things in life. We all know houses are not needed in the locations stated, maybe concentrate in redeveloping the run down areas of the Wirral like Wallasey and New ferry and leave the acres of prime agricultural land alone.
DOR00360	I am writing to appeal against the development proposal for new housing to be built on the fields next to Claremont Farm, Clatterbridge. There are so many brown field sites available for new housing and there is no good reason to build on green fields other than plain greed. The Claremont farm use this land to grow fresh organic vegetables and I am a regular customer to the farm. If you agree to this new development not only will you be destroying a successful local business, you will be destroying the beautiful countryside that makes Wirral such a lovely place to live, not to mention all the animals and insects that live there. Bit by bit it will all disappear and there is no going back. Please listen to the local residents and do the right thing.
DOR00361	I wish to object to the proposed change of use to the car park in Bromborough. Village life would suffer. Nowhere to park whilst using the local shops, nowhere to park whilst using the facilities in the civic centre The proposed housing should be built on an alternative site.
DOR00362	<p>I am writing to express my views, as a Wirral resident, AGAINST the proposal to build new housing on Wirral Green Belt land. In line with the new Office for National Statistics figures, I don't feel that there is a need to release any Green Belt as the brownfield sites available on the Wirral should now be adequate to provide enough houses for the Wirral population.</p> <p>I would like to highlight an error in the Local Plan which affects Lever Causeway and in particular site SHLAA 1819 in strategic parcel SP030 (the field directly behind Stanley Avenue). In your Summary of Initial Green Belt Assessment September 2018. On page 52 the agricultural land use for SP030 has been classed as pasture and horse grazing. In fact, the land under SHLAA1819 on site SP030 is actually used for farming arable, and has been for many, many years. Recent soil reports show the site as containing very good quality soil. SHLAA1819 has already had a crop harvested this year and is currently growing winter wheat. As a matter of fact, it produces crops harvested regularly at least twice/year. The land further down Lever Causeway between Marsh Hey Covert and Little Storeton Village is also being farmed. Therefore a very large proportion of SP030 is actually used for arable farming and not horse grazing as indicated. I have attached a photo of the field in question. It was taken on 17/6/2017. As you can see, it's full of wheat. I've also attached a screen shot of page 52 of the Summary of Initial Green Belt Assessment. Also, as this parcel of land abuts Marsh Hey Covert, and covers an area between Marsh Hey Covert and a copse behind Stanley Avenue, the notes should also include that the area may include supporting habitat, as there is evidence of badger activity, owls and bats in this area. The areas also give protection to other local wildlife whose natural habitat will be eroded by any development.</p> <p>Wirral residents are overwhelmingly sickened by the decadent manner in which its elected Council representatives continuously fail to act in the interests of the people they purport to represent. I am adding my name to this growing list.</p> <p>Recent revelation of Wirral Council's Local Plan in July 2018 demonstrates the inept and duplicitous manner in which our elected representatives report actions and activities to their constituents.</p> <p>Over a period of 13 years, Wirral Council has persistently failed to produce and maintain a Local Plan under its statutory obligation pursuant to the 2004 (updated July 2018) Government National Planning Policy Framework (NPPF). In March 2018 our Government's Secretary of State moved to action its authority by intervening on the Local Plan management of 3 such non-compliant councils. Our Council Leader's response was to declare such action as an overtly political intervention and asserting the rights of Wirral residents (through Wirral Council) to determine where new homes should be built. The Council Leader also presumed support of Liverpool City Regional Mayor in his declaration and conclusion that the region is being used as a pawn in the Tory Government's attack on local authorities.</p> <p>I am sure that Wirral residents do not look at the Local Plan developments as a political game but are genuinely worried about the systematic erosion of their conservation areas and green belt environmental protection. The NPPF was introduced under the Tony Blair government as a national policy and, regardless of political leanings, Wirral residents expect its elected Council to treat it accordingly. Because of its timing, and reversal of various resolutions by our elected leaders, –“Brownfields First” – “Not prepared to allow our Green Belt land to be built on” it is a reasonable conclusion that the proposed Wirral July 2018 Local Plan is a knee jerk response to our national government's intervention.</p> <p>The comments below are specifically relevant to the proposed 2018 Wirral Local Plan Green Belt Parcels SP030 to SP055.</p> <ul style="list-style-type: none"> • The contiguous areas of parcels released fails to comply with Paragraph 134 of NPPF. It classically represents major prospects to avoid unrestricted sprawl of built up areas and defines intent to

DOR REF	RESPONSE
	<p>merge neighbouring towns. Please pay attention to NPPF cautionary message in Paragraph 135 “Once Lost-Lost Forever.”</p> <ul style="list-style-type: none"> • Green Belt Parcel SP030 includes Prenton Golf Course, Prenton RUFC, Prenton Golf Driving Range, Marsh Hey Covert, Cow Hey Covert and the Roman Road which forms a much used right of way from the Lever Causeway, across the golf course and into Prenton Dell . It is unexplainable why no “Protection Notes” are assigned to this parcel. Any encroachment on these open space and recreational facilities is a clear violation of Paragraph 97 of NPPF unless the Council intend to replace such facilities by equivalent or better facilities. • Core Strategy CS6 i.e. preservation and enhancement of character and appearance of Mountwood is jeopardised with the inclusion of SP030 in Settlement Area 3. • Core Strategy CS7 (Area 4) related to local distinctiveness of Eastham Village and Storeton and physical separation with urban areas of Ellesmere Port is violated. • Core Strategy CS11 (Area 8) undertaking to preserve and enhance the rural character of smaller settlements – Brimstage, Raby and Storeton is violated. The above notes have specifically referred to the 26 land Parcels that have been included on the green belt erosion bordering Core Strategy Settlement Areas 3 and 4. This should not be interpreted acquiescence with the remaining 22 sites within the 2018 Wirral Plan. Land grabbing of the nature encompassed in the proposed Local Plan will inescapably result in major costs for, disruption throughout, and management of improved services throughout the development clusters. Regeneration of Brownfield Sites offer major advantages for beneficial use of existing or adjacent basic services. Wirral Waters (Peel Group)It seems inconceivable that in Wirral’s Strategic Housing Land Availability Assessment (SHLAA) major housing prospects identified for Wirral Waters should only result in 935 new houses within the proposed 2018 Local Plan.. Wirral Council, in conjunction with the Liverpool City Regional Council should be energetically driving progress on this project and setting strict targets for delivery over the next 10 years. Brown field first. Additional brownfield sites identified are alongside the list of green belt sites that are proposed for development and total a space for up to 2,400 new homes. These are also in addition to the ‘thousands’ of others that have been granted planning permission but were building has not yet begun. Unoccupied Housing on Wirral Additionally it is estimated there are more than 6000 homes across Wirral that remain unoccupied; these homes should be a priority for refurbishment and re-occupation. This could be incentivised through local grants that stipulate that the property should be sold or rented after completion and within a certain time limit. <p>Summary</p> <p>It is totally unacceptable to even consider developing on the Wirral green belt sites knowing that enough housing can be found to meet the national government target through re-occupation of existing houses and regeneration of the brownfield sites that have already been identified, offering a total well in excess of the 12,000 homes required by 2035.</p> <p>Wirral residents will not tolerate local government negligence and incompetence resulting in the loss of our precious green belt facilities within the Wirral peninsula. We would like to preserve the special character of the Wirral. It is the duty of the local government to investigate and exhaust every possibility to reuse existing housing and assist in urban regeneration sites that have the local services already provisioned and will ensure we preserve our Wirral green belt for future generations.</p> <p>The proposed plans to build on our Wirral protected green belt will contravene the NPPF and lead to unrestricted sprawl of large built up areas and merging of neighbouring towns. This will be detrimental to Wirral and our goal to preserve, maintain and protect places of interest and historic towns. It is paramount that we pay attention to the NPPF cautionary message in Paragraph 135 “Once Lost-Lost Forever.”</p> <p>I would like all of these points to be addressed during the public consultation period and expect that common sense will prevail and local government will act in the interest of its Wirral constituents.</p> <p>Lever Causeway, Mountwood and Bebington Green Belt Development Plans: SP030. I refer to the NPPF (July 2018) which includes useful data upon which to assess general decisions regarding planning policies. I also refer to the Briefing Session: Development Options Review, September 2018.As part of the Stanley Avenue Campaign Committee, I am writing to you regarding the Wirral Council plans to release Green Belt for building on the fields either side of Lever Causeway and from Mount Road towards Storeton. Firstly, I would like to question the methodology used for identifying the Green Belt land for the housing project which you refer to in Briefing Session: Development Options Review (September 2018, slide 5). There could have been more than one methodology - each would have resulted in a different outcome. Please provide evidence to confirm the methodology used by the Council has provided the most reliable outcome, alongside information on who sought this methodology - the council or the planners? The council, in proposing a large area of Green Belt land to develop in Mid and South Wirral, knows very well that a significant portion of this land cannot be developed for various reasons (Storeton Woods, Golf courses) thus leaving a few specific pockets for development. This appears to allow the council’s proposed methodology (of enclosure and clear boundaries surrounded by houses) to be successfully applied for these selected sections of land. We were told that this methodology was subject to public consultation. I would like to request information on whom the stakeholders are who were approached for consultation, as this was not widely publicised. Certainly most members of the public who were present at the Hulme Hall consultation 10/09/18 were not aware of this consultation. I was told by the speaker that I would receive further information by email but I have not received any. Secondly, I must question if the cabinet rigorously confident about the reliability of the advice they received from the civil servants undertaking planning and forecasting? Please provide evidence. The high number of 12,000 houses in Wirral are not needed - the population projection does not warrant this figure as it is in decline. The council must statistically challenge the government about the figures they have suggested. Peel Group have indicated that with the support of the council they will build 6,450 houses in the next 15 years. The council must encourage the development of Wirral Waters that will provide houses, commercial regeneration and employment, similar to that in Liverpool waters, and in keeping with NPPF Item 134 e (2018), “The greenbelt land serves to assist in urban regeneration, by encouraging the recycling of derelict and other urban land”. Peel Group have already got outline planning permission to build 13,500 houses on Wirral</p>

DOR REF	RESPONSE
	<p>Waters granted in 2012. They have applied for 4-5 planning permission requests since March/May 2018 and so far this has not been approved yet. The quoted shortfall calculation of 7,390 houses, slide 17 in Briefing Session: Development Options Review (September 2018), is inaccurate, as it includes the 20% buffer for under delivery. The 20% buffer should be deducted from the total final figure of 7,390 (Briefing Session: Development Options Review, September 2018), and should not be in addition to the estimated total. During the Hulme Hall consultation, September 2018, we were told that some of the brownfield sites cannot be used for building because they are contaminated. This violates paragraph 118 c of NPPF 2018: "Planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land".</p> <p>We were also told during the consultation, September 2018, that small sites in certain areas (egg. Wallasey) are not commercially viable for investors. This violates paragraph 119 of NPPF 2018 "Local planning authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including suitable sites on brownfield registers or held in public ownership, using the full range of powers available to them". The land on Lever Causeway is high quality agricultural land that produces regular crops twice per year. Acres of prime agricultural land will be lost. This land should be kept as such and not used for building in line with paragraph 170 b, NPPF 2018. I request to see recent evidence of adequate site investigation and information, prepared by a competent person, for the proposed and the excluded sites. Encroaching on this Green Belt parcel would violate chapter 16, NPPF 2018, "Conserving and enhancing the historic environment". The Lever Causeway and surrounding areas have a unique cultural and historical heritage related to Port Sunlight Village. Storeton is a historic hamlet which will be directly affected by any building on Lever Causeway. This will cause irreparable damage to its setting. The proposed destruction of Green Belt will also have a damaging effect on Mountwood Conservation Area as it will destroy its setting Mount Road's elevated position currently provides unrivalled views across to the Welsh Hills with expanses of rolling countryside which will be lost forever. Lever Causeway and its open spaces provide an area for relaxation and exercise for innumerable local residents. Any building would cause substantial detrimental visual impact on the remaining Green Belt. This will fundamentally change the character of the area. There is also a risk of increased traffic and major congestion. The benefit of Green Belts are as vital as ever and by looking at other countries, we can see that without the strong protection it offers against most forms of development, more valuable countryside would be consumed by urban sprawl and the 'special character' of Wirral would be irreversibly eroded. The sites either side of Lever Causeway are huge. Once released from Green Belt, building could extend to Storeton, causing unrestricted sprawl, with historic Storeton and Bebington merging. This would result in huge violation of chapter 13 NPPF, "The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open". If we loosen our Green Belt controls or de-designate large areas of it, we would simply allow more land to be built on where developers can make maximum profit, as has been the experience of other countries in Europe, particularly Spain and Ireland (Irish Times, 2006, 'Dublin is cited as worst-case scenario of sprawl.')</p>
DOR00363	Same as DOR00339
DOR00364	<p>My husband I along with most of our neighbours in Raby Mere use Bromborough centre on a regular basis not just to shop but also to use the library and other functions in the Civic Centre. Bromborough U3A of which I am currently secretary rely on the centre for our monthly meetings when we regularly get over 120 members attending. We also use the Hall for many of our associated social events and our smaller clubs use the small hall. We currently have over 200 members many of whom would be unable to attend meetings if the Hall was to close and the U3 A had to relocate. We would urge the Council to think again if they have any interest in keeping Bromborough as a vibrant local centre.</p>
DOR00365	<p>Today was the first that I had heard about proposals to build on the Bromborough village car park and destruction of the Civic Centre. Why haven't the community been made aware of these proposals or are you trying to keep it hush, hush !!! This crazy plan of yours could be the demise of Bromborough as a community. For the older generation, this is a life line not only where they shop but where they meet and bump into other local people that they know. I know new homes are needed for the growing population but are you not already going to build on the Acre Lane school site as well as the new builds that have been constructed in the region already. We have enough cars around the area as it is without congesting Bromborough with more pollution, not to mention the stress it will put on local health centres which has become a joke lately trying to get an appointment. Then we have the school places for any young families that move into these proposed new homes. Why does every decision that you make as a council go against what the local community wants and voted you in for in the first place. I hope you are listening to the people that you are meant to be working for.</p>
DOR00366	<p>I strongly object to plans for the car park, this will have a devastating effect on businesses in the village. This car park is very well used often completely full, without it where we will park to use the solicitors, the doctors and all the other businesses many used by senior citizens who are not able to walk far - please think again. I also object to plans for the Civic centre this is very well used by various organisations including dancing and bridge 2 nights a week, have the council given any thought as to where these organisations will be able to meet.</p>
DOR00367	<p>I totally agree with all the Wirral residents who have written to the Wirral Globe about building on our green belt land. 1. First of all they should be looking at all the brown field sites 2. Also derelict houses and empty flats and derelict land. 3. And use the Wirral Waters land that was intended for a lot of houses 4. Tax payers money should not be spent on a new golf resort as the Wirral has plenty already The Council should be protecting the Wirral Green Belt as we are only a small peninsula that already has a lot of housing being built at present, it is making our roads and motorways even busier and not just at peak times the more houses and people the more cars on the roads. All Wirral Councillors should be standing together on this no matter what party you are from, surely you all want to protect our lovely peninsula ! Everyone should read an E Mail to the Wirral Globe "Stand United". It makes a lot of sense. So protect our Green and Pleasant Land before it is too late!</p>

DOR REF	RESPONSE
DOR00368	<p>My attention has been drawn to proceedings whereby, as a result of Government targets for house building, Wirral Council have been obliged to identify potential construction sites. I note that several of these sites are close to where I live and currently occupy greenbelt land. I would like to share my views and concerns. The sites identified are large, offering the potential to construct multiple houses in each site, in effect forming, or extending small housing estates. Firstly, this seems to contradict my understanding of the Government's plan for greenbelt development, (i.e. that the rules be relaxed only to allow building on otherwise unused and disparate plots within a greenbelt area, a policy which I consider entirely sensible.) I don't believe that the Government intend widespread destruction of greenbelt land. Wirral Council have defended the plan for development by stating a lack of brownfield sites to satisfy the housing requirement for the local area. I must strongly point out that the number of houses required is a Government target arrived at by a "one size fits all" formula for calculating housing needs in all areas of the UK. I simply cannot believe so much development is required for the housing needs in Wirral. I have read that, in fact, there is a prediction of a net fall in Wirral's population in the foreseeable future and that 80% of all house purchases on Wirral are from existing homeowners on the peninsula. The Government has invited challenge of its formula by any Council that can demonstrate a different requirement, why does Wirral Council not pursue this? Next, I must explore the question of who would live in the proposed greenbelt developments. The UK housing deficit that the Government targets seek to address is in affordable homes for first time buyers and those stuck in a world of renting (at higher cost than a mortgage if only someone would give them one!) I can't believe the sites identified would be the plentiful source of low cost houses. A few maybe, required by legislation, but many more luxury and executive homes. Not at all the housing that the Government intend or the UK needs. Mostly I am appalled that the whole plan for Wirral development has been devised in such a short space of time. After years of failure of Wirral Council to provide the much talked about "Local Plan," it would seem that the proposals have been arrived at in a rushed fashion with little thought or consideration of local impact. In conclusion I would like to just remind you of how special Wirral is. There are very few places that have such great access to urban attractions and services but retain such areas of rural beauty. I know that Wirral need houses, I know the Council could use some revenue for that matter, but let's not rip out the green space that makes it unique. This isn't "nimbyism," the view belongs to everyone who lives here. Let's build houses, but only what we need and in the most appropriate sites. Greenbelt development is dangerous, once approved the precedent is set and its destruction will be almost impossible to arrest.</p>
DOR00369	<p>I am writing to you, and to all other Wirral Councillors, as I am one of the many thousands of Wirral residents who are extremely concerned about the proposed Local Plan and the possibility that the Council will allow building on green belt land. I wish to make the following points: 1) The Council appear to be rushing the Local Plan through after having dragged their feet and failed to put a Plan forward for many, many years even though the production of such a plan is mandatory. 2) The Leader of the Council, has stated on many occasions that the greenbelt is "the jewel in Wirral's crown" and he pledged to defend it to his utmost; he and the Council are signally failing to do so both in regard to the Local Plan and the proposed Hoylake Golf Resort (which, incidentally, hardly any residents want). 3) I have been given to believe that Peel Holdings submitted plans in April to develop Wirral Waters which, with offices and other businesses, will provide hundreds of housing units, but they still await to hear from the planning department. 4) There is space for up to 18,000 dwellings on brownfield sites on the Wirral, many more than the stated target number, but clearly developers are reluctant to build in these areas as their profit margins would reduce considerably. The Council should surely be telling developers that if they want to build on the Wirral, then there will be clear restrictions 5) The areas you are highlighting for development would provide housing only for the people who can afford these houses (i.e. the relatively affluent). Developers won't want to build "affordable" houses on this land as it wouldn't be to their advantage - they want to extract the highest profit they can. 6) Decent, affordable housing needs to be provided in areas of deprivation, in an attempt to generally raise the living standard and aspirations of those who live there. 7) Wirral Council appear to be making no attempt to challenge the targets set by the government when there is provision within the guidance for them to do so. 8) The Council's own Compendium of Statistics indicates that the population of the Wirral is actually decreasing overall but with an increase of older people within the figures. I have been informed that, in general, most of the houses sold / purchased on the Wirral are by people who already live here, either buying bigger houses to meet their family's needs, or down-sizing as their families leave home. 9) The Council should not allow the influence of large house-building companies to put pressure on them because these companies are in business to make profits whereas the Council is an elected body that is supposed to represent the people and should make decisions which are best for the area and the people of the area. 10) Further development of greenbelt land will lead to further congestion on already congested roads and add to the problem of air pollution and road accidents. 11) What of infrastructure? More houses = more children requiring school places, many schools are over-subscribed already. What about NHS provision? Many struggle to get a GP appointment when needed already without adding to the population even further and the effect on A&E doesn't bear thinking about. 12) If there is a reduction in greenbelt land wildlife will lose their habitat and these areas will be lost forever. Having a wide variety of wildlife, insects and plant species helps with pollination and other natural processes and having green spaces assists with eliminating pollution and combating the effects of climate change. 13) Flooding has become a major issue in the UK because of general over-development. More concreted areas will inevitably lead to increased flooding risk. Is the Council prepared to cope with this? Is the Council going to plan for and implement measures to prevent flooding in the future? One has only to look at the Environment Agency's website to see how many areas on the Wirral are already a flood risk. For all these reasons and more, for the sake not only of the current generation but for our children's children, I urge the Council to reconsider their proposed Local Plan and challenge the targets they have been given.</p>

DOR REF	RESPONSE
DOR00370	<p>I live between Irby & Greasby, so I'm pretty familiar with the numerous greenbelt sites being proposed around here. I think it's particularly ironic that you spent money last year proudly erecting "earliest dated settlement in western Britain" signs all over Greasby, then planning to destroy what character is left by building on its greenbelt. As a general principle, with the world's demand exceeding its natural resources more every year - https://www.overshootday.org/ - every one of us needs to conserve what's left of the natural environment. Even in urban areas, the effects of paving over greenbelt will be felt in terms of more flooding (as the vegetation previously would soak up and control water flow), worsening air quality (as the destroyed woodland no longer remove pollutants), apart from the obvious benefits that green fields and quiet footpaths have on our collective wellbeing. So lucky that currently no one in Wirral is very far from such a site. Why would you want to damage that? In contrast, brownfield sites usually have better infrastructure and transport links in place, so less affluent families, who may not have car use, are able to access necessary services. Sensitive redevelopment of unsightly brown field sites can regenerate rundown areas, - I fail to see why greenbelt should be touched while so many brownfield sites are crying out to be re-used. The obvious motive would be financial, but I urge our council to resist this and do the right thing. In summary: I strongly oppose ripping up greenbelt, I will be watching with interest who votes it through and who opposes. I will never vote for any councillor who doesn't fight the proposals and I will campaign to highlight this. See you at the council meeting on the 10th Sept. I'll be the one holding the placard - though I think there'll be quite a few of us...</p>
DOR00371	<p>I planned to attend the meeting and did try to register via the link you emailed me although several error messages later did not manage to do so. However, I will now not be able to attend due to work commitments in Newcastle and Sunderland (another area badly damaged by the loss of distinctive community to become in some places one continual housing development). So if you could please forward my objections which I am sure are similar to many other objections:</p> <ol style="list-style-type: none"> 5. Some would say we need more Wirral homes but we are also building an environment for people to live in. These proposals will damage the unique character and environment of the Wirral. 6. The proposal will mean the loss of individual communities establishes and recognised long before Wirral Council existed. These communities of Irby, Pensby, Barnston and Thingwall have been established for hundreds of year and Thingwall as a Viking meeting place for much longer. 7. The green belt corridors are not only important for people but for wildlife as routes between areas which will be badly damaged by the loss of this space. 8. If a business like Peel Holdings with so much available land on the Wirral feel that the market can only sustain 2,500 new homes per year then why does the Government, Civil Service and Council feel we need to release yet more land. 9. I object to the need to release any more land and especially green belt when other suitable land is available on the Wirral and is not being taken into account in the calculation or utilised as originally planned. <p>Available space on the Wirral is being held for no other reason than land investment. If the owners of reclassified Green Belt do the same then will the Council then need to release yet more green space until nothing is left. It appears the process is stacked against locals and to some people somewhat inevitable and possibly it is if we do nothing. New homes are need but we should also look to building an environment for individuals not a loss of communities. We must also ask will releasing any land actually help and especially if landowners decide to copy Peel Holdings example by doing nothing except see the value of their land increase and as a result the Council will need to release yet more greenbelt so the cycle continues. It was a challenging meeting with the large numbers and very emotive issue. If there is anything that I can do or help challenge theses plans then please let me know? Also I have not received the information you mentioned being emailed out.</p>
DOR00372	<p>Just another letter to defend Wirral green spaces, I oppose the labour council plan proposing to allow green belt to be released for housing developments For the following reasons, Wirral does not need all these homes forecast is wrong . Proven by local opposition . Wirral is a unique peninsula there is nowhere like this in the UK - Wirral is so particular and has less transient society which is why it is used in national research into child development because generations can be tracked and recorded because they stay in the area. Liverpool university fund this. Wirral housing needs can mostly be met with using brownfield sites. Many sites have not been put into the plan, empty homes to be used and renovated most people want to live in the community they have family in - Wirral still has generations of nuclear families who want to live near relatives and support each other with elderly care, childcare etc. therefore building affordable homes and regeneration of areas where many young families already live and rent would be important. Aging populations need bungalows or small complex's to free up their homes - town centres need regenerating Birkenhead .rock ferry. new ferry . Wirral waters could be like Albert dock or in Hull the dock lands house most of hulls young families so copy these ideas. Council should Work with peel holding invest in infrastructure that means working with them I want to defend all green spaces but especially Storeton because of the historic value that this area dates from doomsday and it has world heritage site status and grade 2 listed buildings . This area can bring tourism with its historic history i.e. Storeton sandstone is unique and used for many historic buildings from roman times . Green belt prevents urban sprawl and keeps the townships of the original historic Wirral 100 areas unique. It has arable and cattle farming here-farmers livelihoods are at risk and we need farmland for future food chain. building on green belt increases carbon footprint especially with more homes more cars and lack of fields and green trees etc. will increase carbon dioxide and also pollution especially building 500 metres from the motorway where Storeton is , is evidenced to increase respiratory problems especially in children and increasing risk further when they become adults. Infrastructure is not there for schools GPs and roads .</p>

DOR REF	RESPONSE
DOR00372	<p>green spaces should protect our wildlife not destroy it by needless building sites . Storeton in particular is home to barn owls. Bats that can be seen any night in the lanes. Farmers need this land for their family business and have worked this land for generations they need to be protected from planners and developers who care for nothing except profit. Growth in a short term plan like this is useless you need sustainability .green spaces can provide this through agriculture and Tourism. I.e. Caravan and glamping sites , it's so near Liverpool and Chester and beautiful in its own right , promote this don't destroy it . country sports . Walking and cycling and horse sports are all here .Get local colleges to start agricultural courses and work with the farmers to encourage the next generation to love the countryside and they will then want to protect it . Many young men and women who live in Wirral are often disadvantaged and sometimes are not suited to current college courses and may be more suited to working on the land and having that opportunity . Working with animals etc. has been shown to be therapeutic some groups may benefit from projects that involve working on these farms . Farming the Wirral green fields could help Wirral remain a sustainable producer of food etc. from this area to other parts of Britain especially with Brexit potentially increasing food prices from imported food . All the residents in the villages are worried and upset as are all residents in the affected areas and everyone who loves and appreciates the beauty and diversity that is Wirral. Many meeting have been on all over the area of Wirral and residents and council are guardians of the jewel that is Wirral green spaces and must work together to protect what is unique to Wirral and not use this plan to be used as a political football or a smokescreen for political agendas . Elected councillors should be representing the electorate and voting on their behalf and the amount of interest this plan Has generated to protect green belt cannot be ignored . It's a worry that labour councillors say they don't want building on green belt but then vote for the Wirral plan to continue in its present form and pass building developments on green belt i.e. Hoylake golf course and in Saughall Massey. Just to add also the green areas on the M53 corridor reduces risk of flooding on to the motorway which if this did happen would increase risks of accidents and green belt here is a safety crash zone for flight path for local airport.</p>
DOR00373	<p>I severely challenge the figures given for the number of new houses needed. Just today the government have given a new estimate of housing needs which is a lot lower than in their original plan. The figures were just vague generalisations in the first place. There was even a discrepancy between the letter to residents and the figure given at the meeting I attended in relation to the amount of green belt that actually exists in Wirral! So figures are not totally reliable. Surely the answer is to "hasten slowly". Once Wirral's "green and pleasant " land has gone it can't be reversed. Let's use the urban land first and renovate derelict properties. After that there should be a further review as the projected housing needs may well have changed by then. You will have received countless comments about overcrowding, access, insufficient facilities, noise, traffic chaos, air pollution etc. Most of these apply to the area nearest to where I live, the Storeton area of Bebington. Rest Hill Road is little more than a country lane. It seems on the surface that the Council is genuinely taking into account people's views. I can't help feeling a bit sceptical about this as I was a governor of the Lyndale School. At the public meeting to "discuss" its survival/closure the Cabinet had already decided to close it and handed out a printed document to confirm that decision. No account was taken of the parents' and teachers' heartfelt views.</p>
DOR00374	<p>There is no justification in considering the release of Green Belt land. The statements below give adequate reason for this case. I hope all Councillors are fully aware of the unrest that this is causing amongst the people of Wirral and that they will do the right thing at preventing any further loss of 'our' green belt. The Council claim they are being “forced” to release Green Belt by the Government to meet a housing target of 12,000 in 15 years. The Councils’ own Strategic Housing Market Assessment (SHMA) in 2016 came up with near identical housing targets – yet the Council did nothing to contest this. A Local Plan determines what can be built where and what land should be protected. Wirral Council have consistently failed to produce a Local Plan, since the previous plan in 2000. Now Wirral Council have been told by the Government that if they do not produce a Local Plan, the Government will do it for them. Not wanting to lose control, the Council are now rushing through “Consultations” on the Green Belt review and are preparing a “botched” Local Plan based on over inflated, fantasy housing figures to meet Wirral’s supposed housing needs. Government housing targets are based on ONS (Office for National Statistics) population projections over the next 15 years. Independent Analysis of the Housing Targets by [another respondent] has shown that, using ACTUAL recent local population trends, the target should be between 220 - 350 houses per annum (or approx. 4,300 houses in total). [another respondent] background is in mathematical modelling, statistics and operational research. I suggest that [another respondent] analysis and documents should be used as a basis to prove that there is "compelling circumstances" not to adopt the Governments proposed method for calculating housing targets.</p> <p>Why are the Council not challenging the Governments targets, when Government guidance explicitly states that the targets can be challenged? Why are the Council claiming they are being forced by the Government to release Green Belt Land when, the truth is, that the Government are simply forcing them to produce a Local Plan like every other Local Authority? Developers are circling like vultures ready to pick off Green Belt Land. As part of the Council’s Strategic Housing Land Availability Assessment in 2016, the Council received submissions from developers wanting to build on 104 sites across the Wirral. Large house building companies are aggressively promoting the release of Green Belt Land on the Wirral and also contacting landowners, trying to buy up further land. There is space for 18000 houses on Brownfield sites on the Wirral, more than enough to meet even the above exaggerated targets. It is not good enough for the Council to say that Compulsory Purchase Orders for Brown field sites are too costly, or take too long. Compulsory Purchase Orders take around 18 months or so (a relatively small amount of time when the Local Plan is for 15 years). Wirral Waters has “housing zone status”, which means it is eligible for £millions in government grants to remediate and develop the land.</p> <p>Wirral Waters already has planning permission for 13000 houses. Although The Peel Group, who own the site (and to date have built no houses at Wirral Waters), state that they only plan to build 2700 homes over the 2020 - 2035 period but, they have indicated that, with the right public partnership, they could build up to 6450 houses during the 15 year period of the Local Plan. Wirral Council has already spent over £1million on the Hoylake Golf Resort (with its proposed housing estate of 160 luxury houses). They propose to spend £17million on roads for the Golf Resort and lend £26 million to the Developer, (who has a dubious record, including a history of bankruptcy.) Such large amounts of money could be used to help build much needed affordable homes at Wirral Waters.</p>

DOR REF	RESPONSE
	<p>Wirral Council seem more focussed on meeting developers' needs rather than the needs of the people they represent. Wirral Council Leader should drop his plans for the Hoylake Golf Resort and spend the money where it is needed on developing Brown Field sites in deprived areas to meet our housing needs. Green Belt land comes with a premium price, therefore, Green Belt development is usually for expensive executive homes and very few will be affordable housing. [another respondent's] analysis shows that the land the Council propose to release from the Green Belt could actually support over 70,000 houses.</p> <p>It is also scandalous that the Council are proposing to release Green Belt Land for development, when there are, reportedly, between 2000 and 6000 empty properties on the Wirral. Surely more effort should be put into bringing these properties back into occupation. Will Wirral Council's Leader abandon his own overinflated housing figures and abandon his costly Golf Resort Project? Maybe the Green Belt sites for release have been deliberately exaggerated, knowing that there will be a (rightful) public out- cry? Is it then the intention of Councillors to try and become Green Belt Heroes and claim that they have listened to residents and were able to save some of the Green Belt sites? How can we trust Councillors who say they want to protect the Green Belt but have voted time and time again to build on Green Belt (e.g. The Warrens Health Centre in Thingwall: the new Fire Station in Saughall Massie: the proposed Hoylake Golf Resort)? Areas of our Green Belt are our Green Lungs which mitigate against Climate Change. Green Belt development increases traffic and pollution and increases populations in areas without the infrastructure and services to cope. If the Council challenged the Governments Targets, using actual population trends, and worked with the likes of Peel to build houses on brownfield sites, then there would be absolutely no need to release any Green Belt land. I urge all Councillors to represent the views of the majority of Wirral residents and fight tooth and nail to protect what little green belt we have left.</p>
DOR00375	<p>Thank you for the opportunity afforded by the recent public meeting, to understand the future housing development options reviewed by the Council's planning officers. Firstly, I hope that the council & local MPs will critically, question the projected need of 800 additional homes per year on Wirral. If the figure turns out to be true then I would like to know what additional provision will be made for key infrastructure such as schools. Looking at Slide 33 of the on-line presentation (Proposed green belt sites for further consideration), I'm appalled to see that these parcels of land, if developed, increase the sprawl of the more built up areas of Wirral i.e. the vast track of land to the east of the M53 (Storeton, Bebington & Eastham) and also the major expansion in the Pensby, Irby, Thingwall, Barnston & Heswall area. The net impact of which will be integrate these settlements into indistinct urban blocks. Being a resident of Pensby, I specifically object to the proposed developments shown as SP019, SP060, SP061 & SP062. I also disagree strongly with the council's decision to view Pensby-Irby-Thingwall as a single settlement. My specific reasons for objection are routed in (a) green-belt purpose & (b) lack of clarity on how infrastructure shortcomings will be addressed:- Pensby, Irby, Thingwall, Barnston & Heswall would become an indistinct urban block. In so doing the semi-rural character & setting of these settlements will be lost forever. No provision is being made or evidenced that current schools would be expanded or new ones built to relieve pressure on the current schools (all are popular and heavily subscribed).</p>
DOR00376	<p>I've just come across this error in the Local Plan which affects Lever Causeway and in particular site SHLAA 1819 in strategic parcel SP030. I have a copy of the recent soil report, but am waiting for an interpretation of all the figures. I have, however, been told that this report means that the soil is of a very good quality. When I was at the consultation meeting in West Kirby, it was said the Council were using old reports when the map of high quality agricultural land was compiled. I feel that this is an error which could have serious implications in the drawing up of the Local Plan. There is an error in your Summary of Initial Green Belt Assessment September 2018. On page 52 the agricultural land use for SP030 has been classed as pasture and horse grazing. In fact, the land under SHLAA1819 on site SP030 is actually used for farming arable, and has been for many, many years. Recent soil reports show the site as containing very good quality soil. SHLAA1819 has already had a crop harvested this year and is currently growing winter wheat. The land further down Lever Causeway between Marsh Hey Covert and Little Storeton Village is also being farmed. As this parcel of land abuts Marsh Hey Covert, and covers an area between Marsh Hey Covert and a copse behind Stanley Avenue, the notes should also include that the area may include supporting habitat, as there is evidence of badger activity, owls and bats in this area. The areas also give protection to other local wildlife whose natural habitat will be eroded by any development Therefore a very large proportion of SP030 is actually used for arable farming and not horse grazing as indicated. I have attached a photo of the field in question. It was taken on 17/6/2017. As you can see, it's full of wheat. I've also attached a screen shot of page 52 of the Summary of Initial Green Belt Assessment. [Screenshot image attached]</p> <p>In light of the recently published ONS figures, I do not feel that there is any need to release any Green Belt sites, as there are sufficient brownfield sites available in Wirral to accommodate the housing needs of the Local Plan.</p> <p>I have been talking with the Chairman of a Conservation Area since your conversation with her earlier on today and we both agree on the following points. Yes, it is correct that you do not have a copy of the soil report. The report contains personal details and as consent has not been given for this report to be forwarded on to you, I would be in breach of GDPR if I sent it. I feel that you are missing the point here. The land is being used for arable farming and not pasture and horse grazing as stated in your Summary of Initial Green Belt Assessment for Public Consultation. This is a fact. You can drive alongside the field and see the crops growing. If you do not amend this basic data for SP030 you will be knowingly continuing with the Local Plan using incorrect information. It is not for us to prove the quality of soil, you should be ensuring that you have up to date evidence. In light of this, it is absolutely vital that the correct description of SP030 should be included in your Summary of Initial Green Belt Assessment. Evidence can be challenged if it is too old. Please confirm that you have received this email and that you will be investigating and subsequently amending the basic detail and description of main features of SP030 to show the correct facts about this land. To knowingly ignore this will damage the credibility of the Plan and leave the Council open to a legal challenge.</p>

DOR REF	RESPONSE
	<p>Wirral Council's consultation concerning the Local Plan is flawed. We are being asked to comment on a Plan without knowing exactly which numbers will be used. All brownfield sites have not been considered and the brownfield register is not complete. As there are sites in urban areas which could be built on before encroaching onto the Green Belt, Wirral Council are not complying with either paragraphs 119 or 134 of the NPPF. One of the purposes of Green Belt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. I cannot see much of this in evidence in this Plan. Peel Holdings have said that they can build up to 6,450 homes during the life of the Plan, but this number has not been used when calculating housing numbers. We have been told that the Council are currently waiting for Peel to submit their analysis to see how they can justify their numbers, so not only are we unaware of the housing requirement over the life of the Plan, we also do not know the realistic number of dwellings that can be built on brownfield sites. How can we be expected to make informed comments on the Plan when there are so many unknowns? Wirral is a peninsular and as such we are in a unique position. Our Green Belt is more important because we are hemmed in on three sides by water. We have only a small border measuring about 5 miles with one neighbouring authority. This is the only route we can take to reach green spaces should our Green Belt be eroded. A disproportionately large amount of Green Belt is being considered for removal. (1724 hectares) According to CPRE almost 10,000 hectares of Green Belt have been removed by local authorities in England since 2012, so Wirral's 1724 hectares is a ridiculously large amount in comparison. Sites SP030 and SP033 are areas being considered for release from the Green Belt. They are large areas, which if released, will have no protection from development. Urban sprawl will take place. This would violate the first purpose of Green Belt and also the third purpose which is to safeguard the countryside from encroachment. I am horrified to see that the site SP030 has an allocation of up to 1,467 houses which is totally unacceptable. Although it is said that other protections will be in place to stop development, there is no guarantee of this in the future, should the site be removed from the Green Belt's protection. SP030 currently serves 4 of the 5 purposes of Green Belt. Mountwood Conservation Area is also to the immediate north east of this site and any development would directly affect the setting of this area. Any building on SP030 will reduce the physical separation of Bebington SA4 and Thingwall SA7. It will also remove the physical separation of Prenton SA3, Bebington SA4 and Little Storeton. SP030 is one of the largest strategic land parcels in the Local Plan covering 150.95 hectares. To say 56% of this land is adjacent to urban area is misleading. This parcel of land covers a huge area. It needs to be considered by reference to its many constituents parts – none of which remotely reaches the 56% "test". Sites SP030 and SP033 are not in areas of highest accessibility as per appendix 20 of your Development Options Review Documents. 47.41 hectares of land, 31.4% of total area on SP030, are classed as being in the Liverpool City Region Core Biodiversity Area. This includes Prenton Dell and Clay pit Site of Biological Importance and Priority Habitat (woodland). 14.51 hectares of land are classed as LCR CBA on SP033, as per appendix 7 of the same document.</p> <p>There is an error in your Summary of Initial Green Belt Assessment September 2018. On page 52 (copy below) the agricultural land use for SP030 has been classed as pasture and horse grazing. In fact, the land under SHLAA1819 on site SP030 is actually used for farming arable, and has been for more than 20 years. Recent soil reports show the site as containing excellent quality soil. In the summary of initial Green Belt Assessment for Public consultation, only 18.6% of the land in SP030 is classed as Best & Most Versatile Land. It would appear that this information is out of date and incorrect. The figure is much higher. SHLAA1819 has already had a crop harvested this year and is currently growing winter wheat. (See attached picture from last year.) I have been advised that the council have used old reports when the map of high quality agricultural land was compiled. (appendix 7 Initial Green Belt Review Revised Methodology). This error proves the point. Any building on this land contravenes paragraph 170 of the NPPF. The land further down Lever Causeway between Marsh Hey Covert and Little Storeton Village is also being farmed. Therefore a very large proportion of SP030 is actually used for arable farming and not horse grazing as indicated. At a Council Meeting on 15 October, Motion 3 was voted on and carried unanimously. SP030 should therefore not be released from the Green Belt. As this parcel of land abuts Marsh Hey Covert, and covers an area between Marsh Hey Covert and a copse behind Stanley Avenue, the notes should also include that the area may include supporting habitat, as there is substantiated evidence of badger activity, bats and barn owls in this area. The areas also give protection to other local wildlife whose natural habitat will be eroded by any development. There are also 2 copses in SP030 which are covered under TPO 390. [Further information provided]* Any building on any of the sites SP030, SP035 and SP033 would affect the setting of Storeton Village. This would also violate another purpose of Green Belt which is to preserve the setting and special character of historic towns. Lever Causeway and the surrounding fields provide an area of outstanding beauty. The long tree lined road provides an unequalled visual amenity. The area is used recreationally by many people from all over the Wirral for walking, jogging, cycling and riding. Whatever time of day you visit this area, you will always see people exercising and spending their leisure time there. Wirral is known for its Green Spaces and this area is one of the most famous on the peninsular. It has historical significance as it was built by Lord Leverhulme in 1912. Green spaces are vital for our well-being and the NPPF reiterates this. Paragraph 91 states that planning policies and decisions should aim to achieve healthy inclusive and safe places. Your notes on SP030 in your summary of initial Green Belt Assessment, state that part of the remaining open land between the urban edge in Bebington and the M53 Motorway is situated on a rising hillside visible from the M53 Motorway. The highest part of this area is on Mount Road adjacent to site SHLAA1819. Any building in this area will therefore have a disproportionate effect on the rest of the area. The development will be highly visible to any remaining Green Belt and any views will be lost. There is very strong local objection to building on SP030, SP033 and SP035 which are the land parcels each side of Lever Causeway. To conclude, there is no need for any Green Belt to be released for development. Sites SP030, SP035 and SP033 should not be built on because of their exceptional beauty, public amenity and agricultural use. Exceptional circumstances have not been demonstrated to require the release of Green Belt. The whole consultation process the Council has followed is flawed, so flawed that could find itself open to a legal challenge. Photograph of SP030 SHLAA1899 is full of wheat. The photo also shows [attached] that this parcel of land directly backs into Mountwood conservation Area. The white house is on Stanley Avenue which forms part of this area. Any building here will directly affect the setting of this Conservation Area. [Picture and correspondence with various animal groups attached]</p>

DOR REF	RESPONSE
	<p>I am now writing to point out the following:-</p> <ul style="list-style-type: none"> • Whilst I am in possession of a copy of the Soil Nutrient Analysis Report which you have requested, I am not at liberty to supply yourselves with a copy of this document due to what would amount to a Breach of Confidentiality and GDPR. It is not for public scrutiny. • If Wirral Borough Council requires further proof, rather than our word and decades of visual evidence, then it would need to commission its own independent Soil Survey on the land in question namely SP030. • It is of paramount importance, without delay, that your Summary of Initial Green Belt Assessment - September 2018, is amended accordingly. Currently, it states that this area of Green Belt is used as pasture for grazing. <p>THESE FINDINGS ARE TOTALLY INCORRECT</p> <p>There is a serious flaw in the Council's surveying system.</p> <p>In living memory, the said land has been used for decades of arable farming.</p> <p>I also refer to a Council Meeting held on October 15th where Motion 3 was carried unanimously;</p> <p>Accordingly, this land must NOT be released from Green Belt protection.</p> <p>I wish to be notified that this serious issue has been acknowledged and amended forthwith.</p>
DOR00377	<p>Great Crested Newts frequent the area marked SP061. They are found in the garden ponds and on the open land surrounding cross hills reservoir. Releasing this from the green belt would be accepting the natural habitat would be destroyed. No amount of mitigation can replicate or replace what is already in place.</p> <p>The highways infrastructure in the Thingwall & Pensby area is pushed to full capacity as it currently stands.</p> <ul style="list-style-type: none"> • Arrowe Park tail backs blocking access of emergency services · • Blind junction Gills Lane · • M53 Hooton – Major delays from three to two lanes. · • Narrow & Dangerous bends at Barnston · • No Public Footpath Gills Lane & Barnston Road · • Single carriage way Stour ton Lane and Gills Lane · • Roundabout at Landican jammed caused by tail back from Arrowe Park <p>For the above reason I believe SP061 and land within the green belt in Thingwall & Pensby does not meet any of the three objectives from the NPPF. It does not:</p> <ul style="list-style-type: none"> • Make us stronger, more responsive or competitive in our economy – Its slows us down and puts us at risk • Support a healthy community or provide a safe environment – It Increases risk · • Minimise pollution or move us towards a lower carbon economy <p>The Thingwall & Pensby Area has no access to a rail network Additional housing in the area will only contribute negatively to the environment through increased carbon emissions. There are more sustainable sites which can be selected which meet the needs of present and future. SP061 does not meet any of the three objectives from the NPPF. It does not:</p> <ul style="list-style-type: none"> • Improve productivity · • Have accessible service and open spaces for future need · • Mitigate or adapt to climate change – it adds to the problem
DOR00378	<p>I am writing in regards to the proposed consultation and development review of Wirral's greenbelt land. I believe that the consultation in Wirral is grossly unjustified and that Wirral Borough Council has failed in their duty to satisfactorily exhaust all other credible and viable options. The Proposed Green Belt Sites for Further Investigation document (Wirral Council, 2018a) directly undermines the government's aims by proposing a sprawl of development east of the M53 motorway. An area well documented to suffer extreme social class inequalities and greater levels of urban deprivation than the neighbouring west side. The proposed development plans are unfairly weighted to the eastern side of the M53 motorway and threaten the merger of villages and towns such as Storeton with Bebington, and Spital with Raby Mere. Whilst these proposals risk losing the character, beauty and close-knit sense of community these areas enjoy, I also fear they will cause worsening and increased social divide in our local community. The development plans threaten large swathes of fertile farmland, most notably the corridor of land running from Spital to Bebington and Storeton. This land, famously described by Wirral residents as the "jewel in Wirral's crown" is famous for its foot paths, wildlife, fishing ponds and natural beauty. It also includes Claremont farm, a successful family-run business and one of the most notable, if not only major attraction on Wirral. The farm hosts charity events for our local children's hospice as well as educational days out for our children and local schools. Proposed development plans threaten important farmland rented by Claremont Farm which would have a major impact on their farming capacity, government grants and the additional services they provide for our local community and beyond. I believe that Wirral Borough Council have a duty to safeguard our footpaths, farmland and agricultural land from development</p>

DOR REF	RESPONSE
	<p>and to preserve it for future generations to enjoy. The Proposed Housing Allocations document (Wirral Council, 2018c) demonstrates appropriate adherence to this policy by making use of some of the brownfield spaces in Wirral however, I strongly believe these areas have not yet been exhausted. Whilst I recognise that housing demand is increasing, Wirral Council have yet to satisfy their local community that consultations regarding the green-belt land on Wirral are justifiable and that such exceptional measures are really needed. My view is that Wirral Council should focus on improving residents' lives and their environment through regeneration rather than degrading it and risking further social inequalities through development of Wirral's green-belt land. Please consider my views as part of the Development Options Review.</p>
DOR00379	<p>I object to the building of houses on site SP043 - East of Poulton Road, Spital. This is commonly known as Vinyard Farm. Whilst I appreciate that new houses must be built to satisfy government targets (although the figures are not accurate) to build on these two sites would be the worst choice for the following reasons:</p> <ul style="list-style-type: none"> • These sites contain a working farm. It supplies food to the local community and is part of our community. • Dibbinsdale SSSI borders site SP043. Any run off from a new estate would pollute this Local Nature Reserve. • The bio-diversity around this site is fantastic. In my garden we receive visits from hedgehogs, foxes, mandarin ducks, finches, woodpeckers, buzzards, owls and many, many more animals and birds. If the rich habitats around these sites are lost to housing the impact on our local wildlife will be huge. • These sites provide a buffer to Bromborough and preserve the character and identity of Spital/Clatterbridge. • At Vinyard farm there is a Grade 2 listed farmhouse and the site may contain ancient artefacts and settlements. • The local school is oversubscribed already as is Stanton Road the next nearest school. Where will any new families send their children? What about overwhelming the local doctors, dentists etc • The access into site SP043 would only be from Poulton Road a small, winding 2 lane road. How would this be achieved without causing major tailbacks. Spital Crossroads is already congested every morning rush hour and to add more traffic doesn't make sense. If access was provided through the Spital estate already then getting off the estate to join the tailbacks at Spital Crossroads would be horrendous. I know that SP043 has already had 2 development applications to build on Vinyard farm rejected in the past. They were rejected due to site access to SP043 and also the lack of schools, doctors, dentists and other social infrastructure services. <p>Wirral Borough Council has stated that building on green belt land will be a last resort. This proposed plan makes a mockery of that statement. Do not let corporate profit be put above people. Chief Exec, took a £75 million bonus this year. He doesn't care about Wirral. Once our green belt, the thing that makes living in Wirral so great, is gone it will never return. I implore you to fight for Wirral green belt. It is our home and our children's heritage. WE live here and we need You to defend the people here.</p>
DOR00380	<p>I would like to add my voice to the growing concern over the above and its implications for our beautiful peninsula. As revealed at the Council meeting, it seems as though there are viable alternatives to building on Green Belt: 6,500 empty properties across Wirral and Wirral Waters' approximately 6,000 potential homes. Why, then, have the Council produced a Plan that has been met with such protest? I understand the Council's legal obligations in this matter, but why earmark vast swathes of Greenbelt? I live in Moreton, which has a small amount of green space and my wife and I value it - not only as a relief from the concrete jungle but also as it provides habitat for wild animals. I fear greatly for the future of Wirral if this Plan is adopted, in spite of the viable alternatives. I sincerely hope that you and your colleagues will listen to the people of Wirral.</p>
DOR00381	<p>I am very much against the release of ANY Green Belt Land on Wirral for building purposes, but specifically I have the following objections in the area in which I live.</p> <p>Firstly, I understand that one of the 5 reasons for preserving Green Belt land is to prevent the amalgamation of settlements, and while I believe that this argument cannot be used to prevent amalgamation of the Pensby/Thingwall/Barnston area as the entire area is only seen officially as one settlement, this ignores the fact that the patches of open countryside within this one area are much valued by local residents and are indeed one of the reasons we chose to live here in the first place. This countryside deserves to be protected and this is indeed one of the 5 reasons for preserving Green Belt land. It needs protecting to retain the character of the area, for local residents to continue to enjoy walking in and to enjoy the views, not to mention the various species of wildlife that rely on this countryside to live. The areas of Green Belt proposed to be released here- SP019B, SP060, SP061 and SP062 are not small pockets of land but ENORMOUS and if not protected, you would eradicate vast swathes of open land .If one of the reasons Green Belt exists is to protect open countryside, you really need to think twice before taking away any piece of the countryside, let alone such huge sections all in one area.</p> <p>Secondly, I am very much against any large scale building of housing at all in the Pensby/Thingwall/Irby/Heswall area-on Green Belt land or not. I work in the office of one of the primary schools in this area so know from first-hand experience how great the demand is for primary school places at the local schools, all of which have excellent reputations. We already have parents who have had their children placed in two or more local schools as one school has not been able to accommodate siblings- this causes them great logistical difficulties and is far from ideal for the children who are unable to enjoy their primary school years with their brothers and sisters. The simple truth is that there are just not enough places as the situation stands and if large scale building was allowed, this problem would be enormously exacerbated. Families in the area may have to travel some distance to get their children to schools out of the area. Surely this can't be acceptable?</p> <p>Thirdly, I am against some of the developments due to the traffic problems that would result. If development at site SP060 was allowed and access was from Cornelius Drive in Pensby, this would be disastrous as Cornelius Drive is a long narrow residential road which already has issues with speeding cars and limited width due to parked cars. If developments SP061 and SP062 were allowed, the</p>

DOR REF	RESPONSE
	<p>junction at the end of Gills Lane and Barnston Road, already an accident blackspot due to restricted views, would cause a major problem with more accidents undoubtedly occurring. I have sent these comments online to the Council as part of the consultation process but would urge you to keep these points in mind as the Council considers the matter further.</p>
DOR00382	<p>I am one amongst thousands of Wirral residents who is very concerned with the plans that the Council have to allow building on green belt land. There are several points I wish to make:-</p> <ol style="list-style-type: none"> 1. You have had a couple of years to make a decision on this point and get the information to government, but you have done nothing. 2. Peel Holdings submitted plans in April, I understand, to develop Wirral Waters which, with offices and other businesses, will provide hundreds of housing units, but they still await to hear from the planning department. 3. There is space for 18,000 houses on Brownfield sites on the Wirral, which is more than is required to meet the target, but obviously the developers don't want these areas as their profit margins would reduce. The Council needs to tell developers that if they want to build houses on the Wirral, then there will be restrictions - take it or leave it. 4. The areas you have suggested would only provide housing for the people who can afford these houses (i.e. already in work, well paid, middle-income or higher). Developers won't want to build cheap houses on this land as it wouldn't be to their advantage. 5. We need housing to be provided in areas of deprivation, in an attempt to bring these areas to a higher standard of living. If people have decent housing, they are more likely to look for suitable work and improve their standards of living. 6. Are Wirral Council challenging the government's targets? Does central government actually know what amount of housing is required in our particular area? 7. It is a known fact that the population of the Wirral is decreasing. An estate agent recently commented that most of the houses sold and purchased on the Wirral are by people already living here, either buying bigger houses to meet their family's needs, or down-sizing as their families leave home. You will end up with more housing stock than is required. 8. The Council should not allow the influence of large housing companies to put pressure on them; they are in it for profit; the Council is an elected body elected by the people, so should make decisions which are best for the area and the people of the area. 9. Further development of green belt land will add to congestion on already congested side roads, more children requiring schools which are over-subscribed already, and you can't get a GP appointment when you want it already without adding to the population even further, and the effect on A&E doesn't bear thinking about. 10. Further traffic will add to pollution and increase in accidents. 11. If you get rid of green belt land, not only will these areas be lost forever, but animals and insects, etc. will lose their habitat. Having these species on green belt land helps with the natural processes and green land assists with the chlorophyll process which in turn helps eliminate some of the pollution. Many children in built up cities already suffer with chest complaints purely due to pollution. Do we want this for our children, grandchildren and further children down the line? 12. Flooding is a large issue in this country because of general over-development. More concreted areas will only serve to increase flooding. Is the council prepared to cope with this? Is the council going to take measures to prevent flooding in the future? You only have to look at the Environment Agency's website to see how many areas on the Wirral are already a flood risk. <p>Rather alarmed that woodland site of ' Biological Importance' near Caldy Hill and fields identified as ' Agricultural Importance' by the Council specifically in their own policies have been identified as potential Greenfield development sites for housing in the Council' s proposed Local Plan. The SP013 area which has been redlined (enclosed), is not only of significant 1. ecological 2. agricultural 3. aesthetic importance, but the (deciduous)woods in particular are a popular amenity for walkers, horse riders and family recreation and is inherently combined with Caldy Hill as a place to visit in the Wirral and other visitor guides online and elsewhere. Luckily the National Trust have ensured protection for Caldy Hill! Yet the Council seem unable to offer the same protection to woodlands and agricultural land which is inherently integral to the biological and aesthetic value of this supremely unique above (sea level) area in West Kirby and Caldy. Coupled with this, Column Road is a very busy road with adhoc access to public transport. I am therefore surprised that this is deemed to be suitable affordable site for development. Filtering more traffic with associated emissions onto an already busy and dangerous road which is also a drop off and pick up point for the busy Calday School.</p>
DOR00383	<p>Firstly, why develop green belt when there are enough brownfield sites or empty properties to use. I believe there is space for 18000 houses on brownfield sites plus 3000 empty houses on the Wirral. Green belt land is precious it is the lungs not only of Wirral but the world as a whole and with the destruction of rain forests soon clean breathable air will be a thing of the past. Green fields, parks etc. provide areas of beauty bringing peace to the mind and exercise to the body. Once gone they can never come back. Brownfield sites are easier to develop with amenities close by in most cases. Gas, electricity, sewer's and public transport, roads are in place capable of carrying the traffic needed to develop these areas which are ideal as affordable housing for young couples, families who want to start on the home ownership ladder, or for people who wish to downsize. Your plans to develop green belt land is for greed only, to build executive homes suitable for high earners multi car households not for the common good of the lower classes, the low earners, the manual workers those who need public transport and affordable homes. People on the Wirral talk about the incompetent way the council run the borough, the back handers, dishonesty and corruption are allegedly rife, I didn't know about these things until now when the debacle over the rape of our Greenbelt has come top of the agenda and the incompetence and rumours of corruption has bubbled over. Every one of you should be brought to task over this and your misguided reasons explained in full, as quite honestly I can think of no good reason why the council insist on taking this stand to build on precious greenbelt. Some of you may think it is wrong to snatch our greenbelt, some of you may agree that housing built on fields of green is purely for high faluting houses for the rich, some of you may think someone is taking a mighty back hander off greedy developers, are you being bullied or intimidated into going along with these proposals, is the council being held to some sort of ransom by powerful developers? I don't know how the council works but I know you</p>

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	<p>have it wrong over this matter and your incompetence over the last few years by not looking into it properly has led to this 'volcano waiting to erupt situation'. You have only one chance to get this right, please make the correct decision and leave the greenbelt green and beautiful as it is now. Wirral is a gem, fields, beaches and history are attractions that many parts of the UK don't have they are all together on a neat Peninsular yet in your folly you wish to reduce it to a continuous housing estate the beaches and history will remain but the green fields will be gone. Known as the Paradise Peninsular but for how much longer. I am Birkenian born and bred although I have spent periods away living and working this is my home and I love Wirral and I can assure you it is one of the most beautiful places in the UK, please don't ruin it as you are proposing to do.</p> <p>I believe the Government has given the council an ultimatum, build or we (the government) will move in and tell the council where to build and how many properties to build. Is this actually lawful? I have heard Wirral's council has been slow in putting forward its own plans to build affordable housing so they can be blamed for not taking the matter seriously enough, or not providing the required information in time so the council need a good ticking off because they are doing a bad job. It is also rumoured that the council is driven by greed, that it suffers from bullying, corruption is rife, it is weak, the council as a group is un-liked and not trusted by the majority of Wirral residents. We also have the developers who assert pressure to get their own way they should be brought to heel and stopped from using intimidation to apply pressure on easy to manipulate people, landowners. The term AFFORDABLE HOUSING is bandied around but what does it mean? Quote: Affordable (used about HOUSES) "Able to be bought or rented by people who do not earn alot of money. They have increased their provision of affordable housing in order to make home ownership accessible to buyers who would otherwise be unable to buy". Building on greenbelt allows developers to build large executive homes with extensive gardens using up valuable land for the few, not the many who need housing. In other words money making properties for the developers. Land is wasted installing services, gas, water, electricity, building roads etc worst of all it destroys wildlife habitat when in this day and age people worldwide are fighting to protect the environment and its creatures yet this Government and local authorities are determined to build 'unnecessarily' on our precious greenbelt. Once gone, gone forever. These are not Affordable Houses. Wirral has lots of brown belt land ripe for building, with services and roads already in place transport links and schools nearby. Many of the local roads adjacent to proposed greenbelt development areas are not suitable for the high number of heavy construction traffic needed to build. I believe Wirral also has thousands of empty houses. The owners of these houses should be made to either demolish and rebuild or refurbish with a time limit applied. If the owners don't comply compulsory purchase should be enforced. Before any talk of building on beautiful greenbelt all these other options should be enthusiastically pursued. Possibly the government's demands for so many new houses is totally unrealistic for such a small Peninsular, is the figure arrived at by research by actually visiting the Wirral or just plucked out of the air? As stated by the dictionary affordable housing is for low wage earners, people who want to escape from the corrupt rental market even downsizers. Wirral is a small beautiful Peninsular surrounded on three sides by rivers, it will become a virtual concrete jungle if housing isn't controlled there is no room to expand rivers don't give or move over the land ends in a huge wet barrier. If the government pursue their plans to snatch local land, meetings with government officials, the council and general public should be arranged so everyone can hear exactly what is proposed, who is lying to local residents and explanations as to why chaos reigns. The government and Wirral council should grow up and behave like adults their decisions will affect the land, wildlife, and the local population forever.</p>
DOR00384	<p>In your letter you describe the infill as being 'near' our property but do not make it clear or easy to pin point where it is. Your published maps also do not make it clear. After a lot of research I managed to find the infill site SHLAA 871 that lies directly behind us. Having read the 'Summary of Initial Green Belt Assessment for Public Consultation' we are particularly concerned about this green belt site that has been identified for potential release adjacent to our property along Storeton Lane in Barnston. Option 65.3 on page 126 of the report proposes <i>"to extend the existing infill village at Storeton Lane, west to include properties up to and including Woodcroft and Fairfield with a capacity of up to 50 dwellings, subject to the protection of Barnston Dale woodland.</i> This suggests that WBC would encourage developers to purchase Fairfield and Woodcroft including the Green Belt SHLAA site 0871 to allow the above option to happen. Can you please clarify?</p> <p>Fairfield is an attractive 1930's architectural character and because of its semi-rural location including its privacy.</p> <p>We oppose that site SHLAA 871 is potentially viable because of the following constraints and issues: :</p> <ul style="list-style-type: none"> • The proposal of 50 new dwellings would not be in keeping with the character of Storeton Lane West which consists of detached properties set back from the road creating the feeling of open space which enhances the semi-rural feel. Losing this would inevitably have a cost on the community as we will have lost the openness and beauty of the surrounding area. • The option of building 50 new dwellings would not reflect the surrounding housing densities of Storeton Lane West. Barnston is one of the only small villages left in the area, this will be lost forever if we infill the only few remaining spaces surrounding us. The character of Barnston village, a conservation area, will be irreversibly changed forever • Storeton Lane is already a very busy road and rat run to Birkenhead and the M53. Any additional housing on Green Belt SHLAA site 0871 will inevitably impact further to congestion especially during rush hours due to the bottle neck at the top of Storeton lane. It is already a very dangerous and unsafe road with drivers not adhering to the 30mph speed limit. • The Wirral Unitary Development Plan, adopted in 2000, provided sites of special local importance for nature conservation and known sites of Biological importance. This schedule was reviewed and revised only in 2011 to survey the areas included and check they still met the eligibility criteria. Barnston Dale, with its ancient woodland and wildlife was included on this list. (Please see document 'revised Schedule of sites of Biological Importance 2011 on wirral.gov.uk web site). I cannot understand therefore how 50 dwellings built so close to this habitat could not impact upon it. Green Belt SHLAA site 0871 therefore should not be deemed suitable for this. • There is a lot of wildlife migration across our garden and site SHLAA 871 towards the Barnston Dale wood behind. Wildlife I have identified includes Pheasant, Tawny Owl, Foxes, Badges, Heron,

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	<p>Sparrow hawks, an array of birds, Bats, Hedgehogs and Toads. There is a large network of tunnels used by both Foxes and Badgers that interconnect from our garden through to site SHLAA 871 and the Woodcroft.</p> <ul style="list-style-type: none"> • Storeton Lane is regularly used by the emergency services and is an Ambulance and Fire Priority route. Increased traffic as a result of this new housing development will inevitably hinder the response time of the emergency services especially during rush hour times when Storeton Lane West is heavily congested and traffic is backed up. • There is no provision of footpath along Storeton Lane West for 150 metres where the road narrows linking to Barnston village Conservation Area. Any new housing development will increase pedestrian traffic along this very dangerous stretch of road. It will be very unsafe for school children walking through to the village to catch buses to school. • We are greatly concerned about how the local infrastructure will cope. Our local schools are already over-subscribed and GP surgeries and dentists have huge waiting lists. How will increase in demand that these houses will bring to the area be met? <p>The proposals have upset us greatly and we think it's despicable that WBC is playing with people's emotions in this way.</p> <p>We strongly oppose the Council's plans to release current Green Belt land for housing development when there are plenty of Brownfield sites on the Wirral. We urge you to challenge the figures that 12000 homes are required as we believe this figure is a gross over estimate and not reflective of our area. There are over 4000 empty houses on the Wirral, these should be included in the 12000 figure set by the government. We urge council to go back to the drawing board and produce a local plan fit for purpose and truly protect Wirral's precious green belt.</p> <p>We expect your response to include answers to the questions raised and your views on the issues raised in each bullet point above.</p> <p>We are writing to you to express our concerns about the local plan for our area of Barnston and Storeton villages. WBC has ear marked the following greenbelt areas as potential for housing development;</p> <ul style="list-style-type: none"> • Land West of Barnston Road - SHLAA sites 0877, 1956, 1981, 1946, 0883, 0881 and 0932. · • Land West of Barnston Road - SHLAA sites 0877, 1956, 1981, 1946, 0883, 0881 and 0932. · • Land West of Storeton Road - SHLAA sites 0870 and 0871 · • Land East of the M53 and South of Rest Hill Road - SHLAA sites 1551, 1780, 1962, 1963, 1969 and 0866 · • Land North of Levers Causeway - SHLAA site 1819 · • Land South of Levers Causeway - SHLAA site 1777 <p>Having attended the community meeting regarding the local plan, we have identified a fundamental flaw in your plan to develop these areas which if you went ahead would go against 3 out of the 5 purposes of the greenbelt set out in national policy.</p> <p>Barnston village and Storeton village have both been identified to be in core settlement area 8. The surrounding areas have been grouped as settlement areas 7 and 4. The council formed and agreed these settlement areas and in doing so made Barnston and Storeton villages separate from the surrounding towns. As a result of this, any proposed development on the greenbelt sites above would result in the surrounding towns merging into these beautiful villages causing them to be lost forever. This goes against the following purposes of the greenbelt as follows:-</p> <ol style="list-style-type: none"> 1. to check unrestricted sprawl of large built up areas 2. to prevent neighbouring towns merging into each other 3. to preserve the special character of historic towns. <p>To this end we have set up a petition to make the local community aware of these points and so far we have received 650 signatures in less than 2 weeks, a link to this petition is added below for you to review. [Link on email]</p> <p>We wholeheartedly believe, and will argue, that if you persist in your plan to release these sites, then you will be making a mockery of the national policy for the greenbelt and we will make sure that we fight any proposal on the basis of this with the backing of the local community behind us.</p> <p>As you are aware The Office for National Statistics have now reduced the household projection figures so any local plan that is adopted must use these new numbers and not the original target of 12000.</p>

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DOR00385	<p>I vehemently oppose the Council's 'Local Plan' proposal to build over 12,000 new homes (over a 15 year period) the majority of which would be built on released Green Belt Land throughout Wirral but significant majority within the South Wirral area. This is in response to Central Government's national house building targets. Firstly I would challenge the fact that Central Government Ministry of Housing deem it necessary to build such large numbers of housing on the Wirral peninsula. This does not reflect the demographics of Wirral residents nor the historical and future patterns of population growth. Using the Governments own official statistics Wirral's population is less today than in 1981 and the proposed population growth is only an additional 10,898 people by 2036 !!! This increased figure (population total 332,136) will still not exceed the historical population figure in 1981 (pop total 338,954)...SO WHY do we need to build 12,000 houses? Secretary of State for Housing, how can you justify demanding this housing target? Have you or your colleagues in Whitehall ever taken the time to visit the Wirral Peninsula to see for yourself? Wirral is a unique peninsula which has approx 46% green belt land and is surrounded by coastline and has open green areas. Our Greenbelt includes woodlands and nature reserves, areas of natural beauty, agricultural land and areas of historical significance. All of which have been identified as part of Wirral's proposed Local Plan to release for housing development. Wirral Councils proposed Local Plan to release Greenbelt Land for development will increase the sprawl of large built up areas especially within South Wirral area; creating neighbouring towns merging towards one another. This proposal is a gross encroachment on the countryside. It will detrimentally affect Wirral's historical setting and its special character. By not ensuring urban regeneration of derelict Brownfield land such as 'Wirral Waters' the council are failing to ensure the protection of precious Greenbelt Land on the Wirral Peninsula. THIS IS AN OUTRAGE! Furthermore, this is a ludicrous situation that Wirral councillors are saying that there is no option but to use precious Green Belt land within their Local Plan because there is not enough Brownfield sites to meet this housing demand when there are developers such as Peel Enterprises who bought brownfield site - Wirral Waters from Wirral Council approximately 10 years ago with full glossy presentations and proposals to build 12,000 houses and business and community projects, with full support from Wirral Borough Council (who 2 years ago extended their planning permission at no extra cost to facilitate this development) To-date to their SHAME Peel have not built a single house ! This is despite their acknowledgement about the importance of Wirral Waters development in providing the majority this Governments housing target ... they to-date only plan to build approximately 2,400 homes over next 15 years. How can this be when in 2017 Wirral Waters was designated a Housing Zone by Central Government making it the ONLY project in UK to benefit from Housing Zone and Enterprise Zone status thus demonstrating the priority status Central Government was giving to this project. Again Secretary of State for Housing and Wirral Council why are you not enforcing Peel Enterprises to commit to and build these 12,000 houses as they proposed to do? Any finances available from local AND central Government should be aimed towards facilitating the Wirral Waters Development (12,000 houses) and should form the central part of Wirral Council Local Plan!</p> <p>Not only would it satisfy your need for your housing targets but utilising this development as it should be !!! would have the least amount of decimating and detrimental impact on the Wirral peninsula Green Belt areas and therefore Wirral residents alike as the Green Belt would remain mainly untouched. To build the proposed number of new homes within Wirral peninsula is going to require major multi million pound investment in local infrastructure and services (Roads, access, main services, increased size motorway, public transport, new schools, GP's and shops and business) Where does Central Government expect this funding to come from ??? Furthermore what detrimental impact would this have on the environment for all Wirral residents? PLEASE GOVERNMENT MINISTERS, WIRRAL COUNCILLORS and PEEL HOLDINGS see common sense and work collaboratively together to satisfy all parties' interests in providing a sensible housing development plan for a reasonable amount of houses in the right part of the Wirral Peninsula, without decimating Wirral's precious Greenbelt Land that should be preserved for current Wirral residents and future generations to come. ACT NOW BEFORE IT'S TOO LATE.</p>
DOR00386	<p>I am writing to express my views on the current plans to build residential housing on / adjacent to Claremont Farm in Spital. As you can see from my email address, I am currently serving in the Royal Navy. 17 years ago I moved from Church Road in Bebington and resided in Cornwall where I have spent most of my time, returning on the odd occasion to visit family. I have recently moved back to Wirral with my now wife and son and live in Spital. I am old enough to remember Spital Crossroads adjacent to the Pub before lights were installed and recall how problematic the traffic situation was before the current measures were implemented. Since my return I have noticed a huge increase in traffic moving through the crossroads and adjacent roads. This is not isolated to Spital, but also Clatterbridge roundabout and the surrounding areas. As I commute to Manchester on a daily basis I witness the trouble this causes first hand. My concerns are: if building on the area that is current highlighted were to go ahead, the increase in traffic would only exasperate the current issues. Not only would the volume of traffic increase but also air pollution, noise and untimely the safety of road users. I fully advocate the need to meet the governments housing quota and understand the need to provide housing to the younger generation – as I am only in my mid-30s, I class myself in this bracket, nevertheless there must be other areas of the Wirral that would not see such a traffic impact.</p>
DOR00387	<p>Thank you for your letter dated 3rd September 2018 concerning Wirral Local Plan Development Options. In your letter you describe the infill as being 'near' our property but after some research and help from our neighbours the infill of concern to us is opposite i.e. next to and adjoining our properties on Storeton Lane Barnston – in particular residential infill of an open field of 2 acres thereabouts. Your published maps do not make this clear. The document 'Summary of Initial Green Belt Assessment for Public Consultation' identifies the parcels of land proposed for infill - we are particularly concerned about green belt that has been identified for potential release, and in particular the land opposite to our property along Storeton Lane in Barnston. Option 65.3 on page 126 - "to extend the existing infill village at Storeton Lane, west to include properties up to and including Woodcroft and Fairfield with a capacity of up to 50 dwellings, subject to the protection of Barnston Dale woodland." Along this portion of Storeton lane (West Storeton Lane) the housing density is low with less than one property per acre (not including the open field identified for infill). To propose an infill of 50 properties in this green belt open space (Option 65.3) is inappropriate for the following reasons: [The same reasons given in DOR00384a] For the above reasons Green Belt SHLAA site 0871 therefore should not be deemed suitable for the development of such high density housing as stated in your plan. We look forward to your response.</p>

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DOR00388	Wirral Borough Councils plans for the change of use of land in Bromborough to enable building on Bromborough car park and Civic Centre land would surely sound a death knell for an already struggling local economy. The car park is well used, not just by Bromborough residents but also surrounding areas like Eastham and New Ferry. The Civic Centre likewise is well used and considered a vital and valuable community hub, hosting a range of classes, the library and community events. It is with these points in mind that I feel I must object to these short-sighted and ill thought out proposals.
DOR00389	<p>We are deeply concerned to hear of WBC's Initial Green Belt Assessment. We do not understand the use of Green Belt land for housing considering the number of Brownfield sites that there are on the Wirral. We understand that you state that the basis for this is that government ministers have set a housing needs target of 800 new homes each year for the lifetime of the plan - however independent analysis by [another respondent] has shown, that based on actual historic population trends, the housing targets should be much lower (200 - 350 per year). It is difficult to understand why you would not challenge these Government figures? Surely there isn't the pressure for this amount of housing on the Wirral. Having read the 'Summary of Initial Green Belt Assessment for Public Consultation' we are particularly concerned about green belt that has been identified for potential release along Storeton Lane in Barnston. Option 65.3 on page 126 of the report proposes "to extend the existing infill village at Storeton Lane, west to include properties up to and including Woodcroft and Fairfield with a capacity of up to 50 dwellings, subject to the protection of Barnston Dale woodland." adjacent to the proposed development of 50 houses. Does this mean that WBC will be purchasing the field next to our property? Is this land covered under Green Belt legislation? And if this development happens - does this not open the flood gates to allow house building on any Green Belt land – I would have thought that it was your job to protect the Green Belt not allow random house building if it suits you. Can you please clear up this point for me? I feel an even more important point is the narrow section of road from Banagher to the junction with Barnston Road – this is an extremely busy section of road particularly at the beginning and end of the working day, and assuming that 50 houses would result in at least 50 cars - I would be extremely concerned about the safety of people walking along this un-paved section of road – particularly school age children going for buses at busy times. Therefore we would wish to make the strongest objection to this proposal as it would entirely spoil the general feel of the area but I also think it would make the possibility of a serious accident highly likely - due to the narrowness of the road. Storeton Lane is already a very busy road and a rat run to Birkenhead and the M53. Living where we do - we are only too well aware of how many vehicles ignore the speed restrictions already and if you add an even greater number of cars to this narrow road the chances of an accident must be increased. It is not only the possibility of an accident on Storeton Lane that concerns us – you will also be aware that the emergency vehicles and the police also use this road to get from Arrowe Park Hospital to the motorway. We have been advised that the Wirral Unitary Development Plan, adopted in 2000, provided sites of special local importance for nature conservation and known sites of Biological importance. This schedule was reviewed and revised only in 2011 to survey the areas included and check they still met the eligibility criteria. Barnston Dale, with its ancient woodland and wildlife was included on this list. (Please see document 'revised Schedule of sites of Biological Importance 2011 on wirral.gov.uk web site). I cannot understand therefore how 50 dwellings built so close to this habitat could not impact upon it. Green Belt SHLAA site 0871 therefore should not be deemed suitable.</p> <p>Our neighbours and ourselves have been very shocked and upset to learn of these proposed developments and we are at a loss to understand that any local government could consider this to be a reasonable answer to housing needs in our area. Whilst also ignoring local safety and the long held tenets of the Green Belt.</p>
DOR00390	<p>I am amongst the vast majority of Wirral residents who are utterly appalled at the councils plans to develop on green belt land , why on earth doesn't the council challenge the ridiculous figure of 800 houses per annum who are they for this is not the south east . Why do we need to build on PRODUCTIVE FARMLAND when Peel Holdings are sitting on brownfield enough for 13,000 houses , why can't central government get involved and force peel to develop or sell to a developer who will . Are green belt is so important not only as a green lung but as high quality productive farmland it must be looked after for future generations , the people of Wirral do not want this .</p> <p>After attending local plan meetings I am appalled at the councils attitude towards our greenbelt the majority of which is productive agricultural land ,this together with the equine [horses] industry gives Wirral a diverse economy which should be protected at all costs. We are a small borough which contains some of the most densely populated areas in the Merseyside region but nowhere is more than a short bus, train, car or cycle ride away from open countryside containing real farming communities which will be devastated if this plan goes ahead . All effort needs to be put in to developing brown field sites not the easy option of greenbelt ,the proposed housing figures as has been argued are for too high and should be challenged at all cost . Please Wirral council don't go down in history as the council that destroyed are beautiful green belt it needs protecting not just for us but for future generations</p>
DOR00391	I wish to formally advise you of my opposition for releasing Greenbelt land for building on the fields either side of Lever causeway and from Mount Road towards Storeton. The proposed development would destroy the Lever causeway environment and its open spaces which I utilise on a daily basis. I have been brought up living adjacent to Storeton woods and this has provided a beautiful locality to grow up in. This fantastic scenery would be destroyed by the building of homes that according to the population projection are not required in such numbers. It would completely change the whole area that is enjoyed not just by local residents but by members of the public who travel here to enjoy the beautiful landscape and country walks

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DOR00392	<p>I am writing to express my views, as a Wirral resident, AGAINST the proposal to build new housing on Wirral Green Belt land. In line with the new Office for National Statistics figures, I don't feel that there is a need to release any Green Belt as the brownfield sites available on the Wirral should now be adequate to provide enough houses for the Wirral population.</p> <p>I would like to highlight an error in the Local Plan which affects Lever Causeway and in particular site SHLAA 1819 in strategic parcel SP030 (the field directly behind Stanley Avenue). In your Summary of Initial Green Belt Assessment September 2018 on page 52 the agricultural land use for SP030 has been classed as pasture and horse grazing. In fact, the land under SHLAA1819 on site SP030 is actually used for farming arable, and has been for many, many years. Recent soil reports show the site as containing very good quality soil. SHLAA1819 has already had a crop harvested this year and is currently growing winter wheat. As a matter of fact, it produces crops harvested regularly at least twice/year. The land further down Lever Causeway between Marsh Hey Covert and Little Storeton Village is also being farmed. Therefore a very large proportion of SP030 is actually used for arable farming and not horse grazing as indicated. [Motion quoted in support of objection] I have attached a photo of the field in question. It was taken on 17/6/2017. As you can see, it's full of wheat. I've also attached a screen shot of page 52 of the Summary of Initial Green Belt Assessment. Also, as this parcel of land abuts Marsh Hey Covert, and covers an area between Marsh Hey Covert and a copse behind Stanley Avenue, the notes should also include that the area may include supporting habitat, as there is evidence of badger activity, owls and bats in this area. The areas also give protection to other local wildlife whose natural habitat will be eroded by any development [This statement same as DOR00376a]</p> <p>Statutory Compliance: Over a period of 13 years, Wirral Council has persistently failed to produce and maintain a Local Plan under its statutory obligation pursuant to the 2004 (updated July 2018) Government National Planning Policy Framework (NPPF). In March 2018 our Government's Secretary of State moved to action its authority by intervening on the Local Plan management of 3 such non-compliant councils. Our Council Leader's response was to declare such action as an overtly political intervention and asserting the rights of Wirral residents (through Wirral Council) to determine where new homes should be built. The Leader also presumed support of the Liverpool City Regional in his declaration and conclusion that the region is being used as a pawn in the Tory Government's attack on local authorities. I am sure that Wirral residents do not look at the Local Plan developments as a political game but are genuinely worried about the systematic erosion of their conservation areas and green belt environmental protection. The NPPF was introduced under the Tony Blair government as a national policy and, regardless of political leanings, Wirral residents expects its elected Council to treat it accordingly. Because of its timing, and reversal of various resolutions by our elected leaders, - "Brown field s First" - "Not prepared to allow our Green Belt land to be built on" it is a reasonable conclusion that the proposed Wirral July 2018 Local Plan is a knee jerk response to our national government's intervention.</p> <ol style="list-style-type: none"> 1. Green Belt Parcels SP030 to SPO55: The contiguous areas of parcels released fails to comply with Paragraph 134 of NPPF. It classically represents major prospects to avoid unrestricted sprawl of built up areas and defines intent to merge neighbouring towns. Please pay attention to NPPF cautionary message in Paragraph 135 "Once Lost-Lost Forever." Green Belt Parcel SP030 includes Prenton Golf Course, Prenton RUFC, Prenton Golf Driving Range, Marsh Hey Covert, Cow Hey Covert and the Roman Road which forms a much used right of way from the Lever Causeway, across the golf course and into Prenton Dell. It is unexplainable why no "Protection Notes" are assigned to this parcel. Any encroachment on these open space and recreational facilities is a clear violation of Paragraph 97 of NPPF unless the Council intend to replace such facilities by equivalent or better facilities. Core Strategy CS6 i.e. . preservation and enhancement of character and appearance of Mountwood is jeopardised with the inclusion of SP030 in Settlement Area. Core Strategy CS7 (Area 4) related to local distinctiveness of Eastham Village and Storeton and physical separation with urban areas of Ellesmere Port is violated. Core Strategy CSII (Area 8) undertaking to preserve and enhance the rural character of smaller settlements- Brimstage, Raby and Storeton is violated. The above notes have specifically referred to the 26 land Parcels that have been included on the green belt erosion bordering Core Strategy Settlement Areas 3 and 4. This should not be interpreted acquiescence with the remaining 22 sites within the 2018 Wirral Plan. Land grabbing of the nature encompassed in the proposed Local Plan will inescapably result in major costs for, disruption throughout, and management of improved services throughout the development clusters. Regeneration of Brownfield Sites offer major advantages for beneficial use of existing or adjacent basic services. 2. Wirral Waters (Peel Group): It seems inconceivable that in Wirral's Strategic Housing Land Availability Assessment (SHLAA) major housing prospects identified for Wirral Waters should only result in 935 new houses within the proposed 2018 Local Plan. Core Strategy CS 12 declares a potential of 15,200 dwellings, with 7,340 being provided by 2028 (10 Years from now) and achieving over 50% of the Government's 15 year target. In 2017, Wirral Waters was the only project designated as a Housing Zone and Enterprise Zone by Central Government. Wirral Council, in conjunction with the Liverpool City Regional Council should be energetically driving progress on this project and setting strict targets for delivery over the next 10 years. 3. Brownfields First. There are 91 brownfield sites across Wirral where up to 9,000 new houses could be built; these include former schools, bars and churches . The sites identified across the borough where plots currently exist each with potential to build homes ranging from a few up to hundreds. Accordingly, additional brownfield sites identified are alongside the list of green belt sites that are proposed for development and total a space for up to 2,400 new homes. These are also in addition to the 'thousands' of others that have been granted planning permission but where building has not yet begun. Unoccupied Housing on Wirral Additionally it is estimated there are more than 6000 homes across Wirral that remain unoccupied; these homes should be a priority for refurbishment and re-occupation. This could be incentivised through local grants that stipulate that the property should be sold or rented after completion and within a certain time limit. 4. Benefits of Green Belt Land: International comparisons (United Nations Human Settlement Programme (UN Habitat), Planning Sustainable Cities: Global Report on Human Settlements October 2009. (Summary available from www.unhabitat.org) suggest that with the increasing global pressures from climate change and population growth, our farmland and woodland will become more valuable in future, not less. The calls for more development in the Green Belt assume that this land is more valuable if built on, an assumption that is fundamentally flawed - 'economic growth' is

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	<p>not in itself an exceptional case. The Green Belt is needed now more than ever. If we loosen our Green Belt controls or de-designate large areas of it, we would simply allow more land to be built on where developers can make maximum profit, as has been the experience of other countries in Europe, particularly Spain and Ireland (Irish Times, 2006, 'Dublin is cited as worst-case scenario of sprawl'). The environmental value of individual parcels of Green Belt is not the prime concern but together these parcels of greenfield provide accessible countryside close to town and city dwellers. A huge proportion of it has considerable environmental value. In the face of climate change, it has an increasingly important role in storing carbon and preventing flooding and it is a vital economic resource for food and soil protection. The NEA (National Ecosystem Assessment, 2011) recognises the huge value of agricultural land to society, both in terms of food and in 'cultural services' (such as the sense of wellbeing produced by seeing an agricultural landscape). Once a small piece of land is released, the temptation to sell more and more land to developer's increases and the urban sprawl will forever change the beautiful nature reserves of Wirral to concrete. This beautiful nature which you refer to as 'the special character of Wirral' (Core Strategy Local Plan - Review of Development Options, 23 July 2018), and to which many Wirral town-dwellers, our Liverpoolian neighbours and local Ramblers, Scouts, Guides, Duke of Edinburgh Award Scheme participants and local schools visit for clean, healthy air, and walks amongst the natural wildlife reserves of plants, birds and animals with no restrictions on grounds of class or income</p> <p>5. In Summary: It is totally unacceptable to even consider developing on the Wirral green belt sites knowing that enough housing can be found to meet the national government target through re-occupation of existing houses and regeneration of the brownfield sites that have already been identified, offering a total well in excess of the 12,000 homes required by 2035. Wirral residents will not tolerate local government negligence and incompetence resulting in the loss of our precious green belt facilities within the Wirral peninsula. It is the duty of the local government to investigate and exhaust every possibility to reuse existing housing and assist in urban regeneration sites that have the local services already provisioned and will ensure we preserve our Wirral green belt for future generations. The proposed plans to build on our Wirral protected green belt will contravene the NPPF and lead to unrestricted sprawl of large built up areas and merging of neighbouring towns. This will be detrimental to Wirral and our goal to preserve, maintain and protect places of interest and historic towns. It is paramount that we pay attention to the NPPF cautionary message in Paragraph 135 "Once Lost-Lost Forever."</p>
DOR00393	<p>Please accept this email as my absolute objection to the release of building land in the area of Lever Causeway and Bebington. Once land is given up for building it is gone forever and cannot be reclaimed. There is already far too much traffic and congestion on the roads and new houses will only add to the noise and pollution. Green and open spaces are needed for our well-being and quality of life. There are acres of land in urban areas and brown-field sites on which houses can be built.</p> <p>Please be aware that there is no need to build on any green Belt land within the Wirral area as there is more than enough Brownfield land available. The original estimation of 12,000 homes needed has now been severely reduced. This new number shows that there would now be no need to build on any Green Belt land. My own area - Bebington, Lever Causeway and Mountwood - would cause irreparable damage were they to be built on.</p>
DOR00394	<p>There is a lot of opposition concerning the proposed building on our precious Wirral green space, in particular Storeton, Lever Causeway and Mount Road. We don't believe that any Green Belt should be released due to the new Office for National Statistics figures and Brown field sites available on the Wirral.</p>
DOR00395	<p>I object to any building on green belt land in Wirral.</p>
DOR00396	<p>In view of the newly released figures from the Office for National Statistics it is now clear that the predictions for future housing needs on the Wirral that were driving the council's plan to release Green Belt are no longer valid. The new ONS figures show a greatly reduced requirement for housing in the future and this reduced requirement can be met by building on brownfield sites. It is therefore reasonable to expect that you, Wirral Council, will revise the Local Plan to show only brownfield sites as areas for development and to demonstrate that you can be trusted to be custodians rather than pillagers of all of Wirral's precious Green Belt.</p> <p>I am opposing the Local Plan on the grounds that it is based on out of date information and, as the revised information is now available, there is no justifiable reason why that current information is not being used to put forward a revised plan that protects Wirral's green spaces for future generations. This new figure also assumes high levels of economic migration which, given the uncertainty of future employment prospects and the data from the ONS annual survey of hours and earnings placing Birkenhead as one of the ten towns paying the lowest wages, seems unrealistically optimistic. During the public consultation meetings the planning officer had a link to a government page that advised that the figures were going to be revised downward on a slide entitled 'How much housing do we need?', showing that the council has been aware of the need to revise the figures but has not attempted to do so. Currently the plan is showing 4900 acres of Green Belt land being parcelled and considered as suitable for release for development. If you apply the new figures proportionately then only 43 acres of Green Belt would be required to deliver the required growth. Whilst it would be preferable to protect all of our Green Belt from development, the revised figure might be justified if all Brownfield sites and empty buildings had been accounted for correctly and utilised and there was still a shortfall against the new figures. I am opposing the Local Plan where it relates to the release of Green Belt land for development with particular reference to land in Bebington, East of the M53. The identification of the M53 as a strategic boundary effectively slices Wirral into two halves. A built up half and a wealthy half, adding to the already identified health and wealth divide between Heswall and the coastal West and the rest of the Wirral. Currently Bebington consists of 55% built upon area and 45% Green Belt, if the plans to release everything east of the M53 go ahead, Bebington will be 100% built upon. It would make greater sense to use Storeton Ridge as the strategic boundary where the B5151 runs alongside Storeton Woods and where the land starts to drop away from its highest point. This would be a natural boundary and would be in keeping with the already identified Green Belt boundaries. When The Localism Act 2011 was introduced it was described as an opportunity 'to allow local authorities to set a vision in consultation with local people about what their area should look like in the future'. The idea that the local residents of</p>

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	<p>Bebington would see the loss of 100% of their Green Belt as a vision for their future is deplorable. Furthermore, it goes against the overarching objectives set out in The National Planning Policy Framework with regard to local plans meeting their obligations for sustainable development:</p> <p>Social objective – Development plans should support communities’ health, social and cultural well-being Environmental objective – Development plans should be protecting and enhancing our natural, built and historic environment. SP030 North of Lever Causeway, Storeton Prenton Golf Course; Prenton RUFC; Lever Causeway; Cow Hey Covert; and Marsh Hey Covert Prenton; Bebington With reference to specific parcels of land I would like to add the following objections: SP030 is an area of mainly agricultural land offering good quality agricultural soil. It includes the historic ‘Levers Causeway’ which is of local significance, relating to the late Lord Leverhulme who planted tree lined Lever Causeway and linked it to other tree-lined causeways across his estate that still exist today (within the Green Belt) and that are a unique feature and landmark of this area. Levers Causeway is a ‘breathing space’ for Bebington and provides a recreational path running the one mile length of the causeway which is valued by horse riders, walkers, joggers and cyclists. It is also home to various species of wildlife. Under Green Belt Objectives SP030 meets Purpose 1-3. SP031/32/34 Little Storeton, Storeton Village and West of Landican Lane, Storeton. Storeton Village is an historic settlement mentioned in the Domesday Book of 1085. It also houses Storeton Hall which was built in 1372 for the Master Forester of Wirral. The village is of historic significance and should be protected for future generations. Developing in and around Storeton fails to address the NPPF objective relating to protecting and enhancing our natural, built and historic environment. SP033 / 35 North of Marsh Lane, Storeton and North of Rest Hill. This land, particularly at its boundary with the B5151, represents a natural border between housing and countryside. From this vantage point one can see across Wirral to the Welsh Hills. It gives the impression of uninterrupted green space as far as the eye can see, with just the horses and historic Storeton to break up a picture postcard scene. The importance of this aspect for the health and wellbeing of those that pass it daily either by car, cycle or on foot cannot be underestimated. Passers-by emerge from a built up area to a view of the possibilities that lie in the countryside and beyond. With regard to Green Belt it meets: Purpose 1 – To check the unrestricted sprawl of large built-up areas Purpose 3 – Safeguarding the countryside from encroachment SP036/37/41 North of Red Hill Road, East of Brimstage Lane, West of Brimstage Lane, Storeton. These areas fall away from Storeton Ridge towards the M53. The built-up land rises to the B5151 at Storeton Ridge and then falls away as countryside and woodland on the opposite side of the road. This area is land farmed from the farm buildings in Storeton village and is part of the unique history of that settlement / hamlet. Footpaths that criss cross these fields link Bebington with Storeton and Brimstage and provide an outlet from the urban areas to the rural villages of Brimstage and Thornton Hough. The possible option here would be to split parcel SP037, where the land falls away in the opposite direction, and develop a parcel from Clatterbridge roundabout to the south/south west side of the existing public footpath (south of the ponds and the lane), where no existing footpaths or housing would be affected.</p>
DOR00397	<p>We strongly object to the green belt land on either side of Lever Causeway and Mount Road to Storeton being built upon. With an abundance of brownfield sites and at least 5000 empty properties across the Wirral, it beggars belief why you are even considering using this green belt for houses. The Wirral does not need 12,000 homes, nor does it need cheap and nasty homes being built which look like every other - it will be an eyesore - using this land will be a huge blot on the landscape and fundamentally change the character of the area, the views and ruin conservation land.</p>
DOR00398	<p>I would like to register my very strong objection to the proposed release of all green belt land east of the M53. This would lead to far more vehicles at a time when the negative health effects of traffic are very well known. The east coast of the Wirral peninsula is already jam-packed with development, and it would be such a tragedy if its habitants were forced to 'venture west' to do such simple things as walk in the woods and breath fresh air.</p>
DOR00399	<p>I would be really grateful if my concerns could be taken into consideration. I have lived in Bebington all my life and proud of the surrounding countryside. My children our benefiting daily from the introduction of the pathway on Levers causeway- we cycle, walk, run and enjoy the fantastic unspoilt scenery and countryside air. Please do not deny us and future generations on an unnecessary build on beautiful green belt land. Once gone it's lost forever, we have historical importance- DON'T lose it please. There is brown belt land to be used all over the Wirral without destroying nature's habitat.</p>
DOR00400	<p>I am utterly shocked that Wirral Borough Council is considering using the Wirral Green Belt for development knowing that there are sufficient urban areas to build upon to achieve the required housing over the next 15years. As the Wirral is a peninsula and surrounded by water it is absolutely paramount that we preserve the Green Belt such that residents have access to the countryside and can appreciate some recreational and relaxation away from the hustle and bustle of the built-up areas. I hear that Lever Causeway is under threat and is being targeted for development, below are the reasons that I would like to be considered as objections to any development:- It will fundamentally change the character of the area and impact on the Mountwood Conservation area. destroying the setting. - If Lever Causeway was built upon it could extend to Storeton, causing unrestricted sprawl, between the historic Storeton and Bebington village. - The increased traffic would lead to major disruption, at busy times the Lever Causeway junction and surrounding junctions are gridlocked already. - Storeton is a historic hamlet which will be directly affected by any building on Lever Causeway. - Acres of prime agricultural land will be lost. Common sense should take precedence here and the Green Belt and the Lever Causeway should be preserved for generations to come, as once it is lost it is lost forever.</p> <p>I have just been reviewing the new Office for National Statistics figures that show a reduction in the housing requirements over the next years. Based on these new statistics you should not have to release Wirral Green Belt as we have enough brownfield sites available on the Wirral to meet this demand. I would expect that Wirral Borough Council will now adjust it's 'Local Plan' to these new figures and inform the residents of Wirral that the devastating threat of losing Green Belt on the Wirral will now be removed.</p>

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	<p>I have already registered my objection to releasing of the green belt across the Wirral for housing development, with my objection based upon there being enough empty houses and brownfield/urban land that could be redeveloped to meet our current and future needs over the next 10 to 15 years. However, as we prepare our case for these objections in the event that these green belt proposals do move forward, it has become clear that the Local Plan Assessment (Sept 2018) is also misleading and contains incorrect information. One example is that SP030 is referenced as pasturing and horse grazing in fact, this land is actively used for farming and has been harvested earlier this year and will continue to bear further harvests through the winter. It is clear from the WBC recent meetings and passed motions that agricultural farming land should be protected, SP030 falls into this category. It would also jeopardise the local habitat as there are clear indications of badger activity, owls and bats in this SP030 green belt area. Please can you ensure that this is considered and that WBC abides by their own policies and agreed council motions are honoured. I am absolutely astonished that WBC would even consider threatening Wirral green belt and the beauty that this brings within our Peninsula, not to mention the wildlife that it supports.</p> <p>Another letter sent with the same content as DOR00392</p>
DOR00401	<p>I make comment against deleting existing Green Belt status and the council's potential future inclusion of site SP061 as developable for housing. I accept that there needs to be an assessment of available, suitable, viable, available and sustainable sites and understand that site SP061 forms part of a number of alternative green belt sites under consideration. I suggest that under current local and national planning policy, of all the notionally 'protected' Green Belt sites in this review, site SP061 is the least suitable and also fails to accord with many NPPF policies. Below is a bullet point list of comments supported by the appropriate NPPF policies. In the absence of an adopted Local Plan, I am not making any reference to previous Local Plan except to state that Green Belt was established for valid reasons in what may now be 'outdated plans' but is never the less supported by current NPPF and therefore the same principles still apply.</p> <p>NPPF 9. Protecting Green Belt land</p> <ul style="list-style-type: none"> • Site SP061 fails to meet every fundamental aim of the NPPF regarding 'protecting Green Belt'. • Potential deletion of green belt for development on site SP061 fails to accord with NPPF 'Protecting Green Belt land'. • Fails to 'prevent urban sprawl' NPPF 80. • Fails to 'check the unrestricted sprawl of large built-up areas'. • Fails to meet NPPF essential characteristics of Green Belt: 'openness and their permanence'. • Fails to 'prevent neighbouring towns merging into one another;' In this specific case, removal of Green Belt status on SP061 would reduce and remove physical separation between neighbouring settlements/ towns. It should also be said that if SP062 was to be considered also, this would result in Thingwall, Barnston, Heswall and Pensby merging. • Fails to 'assist in safeguarding the countryside from encroachment;' NPPF 80. • Fails to 'preserve the setting and special character of historic towns'. • Deletion of Green belt under NPPF (9) 81 fails to, 'enhance the beneficial use of the Green Belt, retain and enhance landscapes, visual amenity and biodiversity; . • NPPF 110. <p>In preparing plans to meet development needs, the aim should be to minimise pollution and other adverse effects on the local and natural environment. Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework.</p> <ul style="list-style-type: none"> • 'Exceptional circumstances'. Given the number of alternative more suitable, sustainable and less environmentally damaging sites included in this current review, exceptional circumstances would only become valid for SP061 if those alternative more suitable sites under consideration had already been developed and no alternatives were available. Never the less, it is accepted that SP061 has to be included in order to be properly assessed and then excluded as the least suitable and least sustainable of the sites. • NPPF 88 [Quoted].
DOR00402	<p>In addition to the points further below - where I cover the basic points of my vehement objection to the council plan - I would add some specific planning points regarding the land around Lever causeway and Storeton village. There 5 tests that the government lay down on green belt planning. These are:</p> <ol style="list-style-type: none"> 1) There should not be unrestricted sprawl of large built up areas. Connecting Storeton village to Bebington undeniably would break this rule as would the enlargement of Storeton by building from there to the motorway. However the plan shows that this is considered and therefore breaks guidelines 2) Prevent merging of neighbouring towns. Ditto 3) Assist in safeguarding the countryside from encroachment. The paths around Storeton - Landican lane, Roman road and many others are well used by Wirral residents and give great access to countryside and nature. The plan allows these ancient byways to be either removed or surrounded by houses. 4) Preserve the historic setting and special character of historic towns. Storeton is an ancient and important historic settlement and probable site of the battle of Brunanbarth. Nearby Storeton Woods has lovely views over the village and surrounding countryside. This important and well used local beauty spot would have it views and environment ruined under this plan. 5) Assist in urban regeneration by encouraging the recycling of derelict urban land. <p>No derelict land in Storeton but plenty in Birkenhead - far more than WBC half-hearted estimate.</p>

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	<p>I object most strongly with the plan. It should be withdrawn now and a proper local plan produced. It is flawed on many levels:</p> <ol style="list-style-type: none"> 1. The projected requirement is grossly exaggerated. The population of the Wirral is falling and even the office of National Statistic projects a Rise of only 4,200. How then can 12,000 homes be needed? The projections which the council have given are WRONG If the council did not realise this before they must do now given the analysis [another respondent] which is irrefutable. To proceed with the planning proposal with this knowledge is irresponsible and grossly negligent. 2. Little attention has been given to Brownfield development, the council report shows little rigour or detail and contains errors i.e. a large underestimate of Brownfield potential. 3. Green belt projection has been developer led rather than a serious review. Developers are only interested in maximum profit and least cost. Not what is best for the community. The volume of green belt land in the plan is enormous and gives no thought to the current much higher densities of build. 4. urban sprawl - the lack of thought to the green belt proposal will result in Urban sprawl which is directly against government guidelines. One area in particular around Lever Causeway and the village of Storeton, if built on, would connect this village - the most important ancient settlement on the Wirral - to Birkenhead. 5. Development on green belt land is comprehensively shown not to deliver affordable homes. Homes are needed on the Brownfield sites of Birkenhead, Wallasey and New Ferry where least effort has been spent on the plan 6. The assessment of both the conversion of existing planning applications into builds and the conversion of empty property is downgraded. Why? For example empty houses are converted currently at 200 per year (which surely could be improved on greatly) whereas the plan shows a much lower conversion of 60 p.a. Given there are 6,000 empty properties this is significant. 7. Wirral Waters - the council seems determined to downplay the level of houses available here citing the government guidelines and burden of proof required by inspectors. However the High Court ruling of 2017 shows that high burden of proof is not required. Furthermore - this is the area where houses are needed and the 6,500 estimate from Peel Holdings should be used in the plan. 8. Given the points above there should be NO green belt included within the plan to fulfil the housing needs of Wirral. It may be that this fiasco was started by central government but - speaking as a lifelong labour supporter - the council are equally culpable in their incompetent response. Instead of the green belt being used as - I quote - 'last resort' this plan puts it first in the firing line. <p>Points on my objection to the council plan -</p> <ol style="list-style-type: none"> 1. I welcome the revised ONS figures forecasting a much reduced population for Wirral borough by 2035, in line with but still above the historic trend. 2. I understand that a figure of some 488 units per annum are now required, 7,320 over the 15 year period. 3. I know, as does the Council, from Peel that they are able to redevelop the derelict industrial heartland of the borough at Wirral Waters and plan to deliver some 6,450 units within the 15 year period. 4. I am also aware that the Council has over 2,400 units identified on brown field sites (some at Wirral Waters) and also has between 4,000 and 6,000 empty properties that could be brought back into habitable use. 5. From the Appeal Court ruling by a Judge I know that new home building need only to be "possible" not definite. 6. It cannot be SUSTAINABLE as per the planning guidance (NPPF) to destroy farmland when there are brown field sites and empty houses available. 7. Where are the jobs to enable people to buy these houses? <p>I therefore call on Wirral Council to drop any proposals to release Green Belt for development as there is clearly sufficient brown field land and refurbished housing to meet the "theoretical housing need". In addition, I call upon Wirral Council to reconfirm the existing proven Green Belt boundaries. I do not consider that Wirral Council is short of funding to support the redevelopment of the derelict heartlands, since it has recently voted to lend up to £26m to fund its "vanity Golf Resort". Surely the focus for this Council should be on bring the old industrial heartlands back into use and the Hoylake Golf Resort "scheme" and its costs should at long last be abandoned. These responses are specific to plots SP030 to SP037 . Planning areas SP030 to SP037 should NOT have been included in the consultation and should not appear in any subsequent plan. As :</p> <ol style="list-style-type: none"> a. Building in these areas would constitute urban sprawl as defined in government guidelines section 133,134 (see below) and would clearly merge Storeton to a 'large built up area.' b. in the recent appeal against the decision to refuse building at Storeton Hall Farm in Storeton, the council used the argument that it would spoil the view (and amenity value) from Storeton Wood. Any building on the mentioned plots would spoil that view by a far, far greater degree and so breeches the Councils own position on this area. c. SP030-SP037 are prime agricultural land. d. Storeton is an historic village with a special character and setting and should be considered a 'Heritage Asset' as mentioned in the National Planning Framework. Building on SP030-SP037 would permanently damage this asset for future generations. <p>[NPPF p133 and 134, information attached] To add to my strong objection to ANY building on greenbelt when there is a proven supply of brownfield sites to satisfy even the original planning figures I would add the following point which MUST be addressed: There is an error in your Summary of Initial Green Belt Assessment September 2018. On page 52 the agricultural land use for SP030 has been classed as pasture and horse grazing. In fact, the land under SHLAA1819 on site SP030 is actually used for farming arable, and has been for many, many years. Recent soil reports show the site</p>

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	<p>as containing very good quality soil. SHLAA1819 has already had a crop harvested this year and is currently growing winter wheat. The land further down Lever Causeway between Marsh Hey Covert and Little Storeton Village is also being farmed. Therefore a very large proportion of SP030 is actually used for arable farming and not horse grazing as indicated. At a Council Meeting on 15 October, Motion 3 was voted on and carried unanimously. (First Para of Motion 3 quoted)Also, as this parcel of land abuts Marsh Hey Covert, and covers an area between Marsh Hey Covert and a copse behind Stanley Avenue, the notes should also include that the area may include supporting habitat, as there is evidence of badger activity, owls and bats in this area. The areas also give protection to other local wildlife whose natural habitat will be eroded by any development. I am horrified by the lack of care shown in the local consultation and the lazy approach. To this 'plan' with no real effort in addressing brownfield and empty property calculation but instead the easy option of building on the greenbelt.SP030-SP037 :The wildlife in this area is exceptional and their habitat should be preserved and not disturbed some specific notable species being : BATS - there is a large population of bats in the area. They roost in Storeton Woods, Storeton Hall farm and Grange farm to my knowledge and probably in the copses locally and also on the west of the M53. . They swoop out across the fields on either side of Lever Causeway. Building on the above plots will take away their food source severely depleting and quite possibly wiping out the population. BARN OWLS - again, this rare bird nest locally in Brimstage, Barnston and Storeton and fly across the fields in search of small rodents. Build on the fields and their food source goes and so do they. BUZZARDS - in the field behind Grange Farm there is a post and wire fence. Each year in early summer between 3 and five buzzards sit on the post surveying the fields for prey. I see them from my bedroom window. You also see them 'hopping' in the fields to disturb earthworms. They undoubtedly nest around here and fly over the fields for food. Almost every time I walk my dog around here you see them in the air. HEDGEHOGS - this area is very rich in Hedgehogs, not true of many places where they are in decline. They live in my and neighbouring gardens, you see them at twilight and there are always droppings on my lawn. You see their droppings also along Landican Lane, Roman Road and in the copse half way along Lever Causeway. They are therefore prevalent in the fields and hedgerows. Building plus increased roads / traffic will decimate this population. OTHER - Birdlife in general thrives in the area, sparrows do well (in decline elsewhere), goldfinch also. We have fieldfares in large numbers. Predators are here in number - which is evidence of the abundance of wildlife. Various raptors - sparrow hawks, merlins etc. Are here and Foxes are a common sight. They will also go if there is building on this area of the greenbelt Again - these plots if built on contravene the Government guidelines in that it is Urban Sprawl. The plan shows a conurbation swathe being added to the main building of area and connecting to the isolated village of Storeton/Little Storeton. This and the arbitrary use of the Motorway as a defining line is evidence of poor planning and will be challenged.</p>
DOR00403	<p>We live on Stanley Avenue in Higher Bebington and are aware if the proposal to possibly turn some of the green belt land nearby into housing developments. This is of considerable concern to us, especially areas near lever causeway and Storeton. We don't feel there is any need to release any green belt land due to the new office for national statistic figures and the brown field sites that are available on the Wirral.</p> <p>I am writing to inform you of my objections to the proposed development of Green belt land along Lever Causeway. of historic towns for the following reasons 1. Check unrestricted sprawl of large built up areas 2. Prevent neighbouring towns merging into one another 3. Preserve the setting and special character of historic towns 4. To assist in urban regeneration by encouraging the recycling of derelict and other urban land 5. To assist in safeguarding the countryside from encroachment. I use the Lever Causeway frequently and will be significantly affected by development anywhere along its route. I am concerned about the lack of planning for services such as schools and doctor's surgeries. The impact of any housing development on the local area will be very significant and change the area in a negative way for good. Given the recent published figures from the office of national statistics surely means that this development is not necessary. In addition the vote that was passed unanimously on the 15th of October that carried the motion that land that is used of productive agriculture should not be removed from the green belt then the whole of SP030 should therefore not be removed from the green belt. I oppose any such plans.</p>
DOR00404	<p>We would like to object to any possible building on the Green Belt land to the back of our house on Stanley Avenue. Green belt land should remain as: a) to check the unrestricted sprawl of large built-up areas b) to prevent neighbouring towns merging into one another c) to assist in safeguarding the countryside from encroachment d) to preserve the setting and special character of historic towns e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</p> <p>We don't feel that there is any need to release any Green Belt due to the new Office for National Statistics figures and the brownfield sites available on the Wirral.</p> <p>There is an error in your Summary of Initial Green Belt Assessment September 2018. On page 52 the agricultural land use for SP030 has been classed as pasture and horse grazing. In fact, the land under SHLAA1819 on site SP030 is actually used for farming arable, and has been for many, many years. Recent soil reports show the site as containing very good quality soil. SHLAA1819 has already had a crop harvested this year and is currently growing winter wheat. The land further down Lever Causeway between Marsh Hey Covert and Little Storeton Village is also being farmed. Therefore a very large proportion of SP030 is actually used for arable farming and not horse grazing as indicated. At a Council Meeting on 15 October, Motion 3 was voted on and carried unanimously [First para of motion 3 quoted]. Also, as this parcel of land abuts Marsh Hey Covert, and covers an area between Marsh Hey Covert and a copse behind Stanley Avenue, the notes should also include that the area may include supporting habitat, as there is evidence of badger activity, owls and bats in this area. The areas also give protection to other local wildlife whose natural habitat will be eroded by any development.</p>
DOR00405	<p>I would like to object to the use of so much Green belt land in Bebington for housing. The infrastructure will not support the increase and the population does not support the figure. I trust that you will listen to the local resident's comments and adjust your plans.</p>

DOR REF	RESPONSE
DOR00406	I would like to register my sincere objections to the announced plans to build on Wirral peninsular green belt. Given the amount of brownfield land on the Wirral it is an act of environmental sabotage, cultural and heritage self-harm to even consider using our beautiful green belt for more housing development. I live in the CH63 area which I understand is the most desirable post code in the UK-based in part on the local topography. I cannot complain sincerely enough about yet another centrally-dictated myopic proposal from a command and conquer style government. Leave. Us. Alone.
DOR00407	I strongly object to the proposed usage of green belt land in the Ch60 region. The land in question will take in area behind the glegg arms and meet with sun Croft road. We already encounter many traffic issues with vehicles parked for children attending Barnston school, furthermore the park is also in this region and it's loss would be a criminal act. Congestion is a major problem in this area and to increase it would make the area unsafe for the elderly and children. There is enough brown field sites across the Wirral to meet government demands.so please use them.
DOR00408	Please accept this email as our request that the plans to build on the fields on Lever Causeway and Mount Road towards Storeton are scrapped. There is sufficient urban land to build on and sufficient empty houses which just need renovation. The population projection does not warrant 12000 houses. The character of the area would be decimated. It would be harmful to wildlife and the environment. Increased traffic fumes would damage the health of local residents. The creation would disrupt local residents and in future cause more traffic congestion than there is now. The choice of walking locally in a green space would be lost to many residents – particularly the elderly who may no longer be able to drive to countryside locations – causing a decrease in health and further burdens on the NHS. Local amenities would be overstretched. The views across from Mount Road would be lost for ever. Prime agricultural land will be lost. The historical value of the area would be lost. The area would lose its character and become just another identikit mochaccino land. We chose this area as the best place to bring up our child, our child and generations of children to come would forever lose the immeasurable benefits of proximity to green spaces.
DOR00409	It had brought to my attention that there has been proposal plan to build houses on the Wirral Green Belt land, including Lever Causeway. I am writing to you to let you know that I am opposing to the proposed plan as I believe that it will be damaging not only to the beauty but also not good for environment for our future generations.
DOR00410	The proposed plan to build on green belt either side of Lever Causeway is an absolute disgrace, this area provides exercise and relaxation out in the fresh area with lovely views to the Welsh Hills. Not only do nearby residents use it but people come from other areas of Wirral to keep fit or walk their dog. I regularly use it myself, it's safe everyone is friendly and it has been proven that green areas and nature benefit health. The increased traffic and congestion will be horrendous, Mount road is already busy with not just local traffic but traffic from nearby motorway! To see this beautiful area destroyed will be heart breaking its part of our heritage, the historic hamlet of Storeton will be affected too. I strongly object to this proposed plan
DOR00411	<p>I have issues with the overall plan, I am particularly disappointed with the Infill proposals (SP 099, SP100, SP101, SP103, SP104). These Green Belt Parcels form the link between sections of the Wirral Country Park and the Coastal Zone. Currently there is a contiguous route along the beautiful Dee estuary with its views of Wales and Moel Famau. Your proposed developments on these prime Green belt and high quality agricultural sites will destroy this environment. These parcels are part of an essential visual amenity enjoyed by many people from inside the Merseyside area and from further afield, who walk and cycle and enjoy the Wirral Way and Country park.I was pleased that the recommendation for each Green Belt Parcel listed above was, 'not suitable for release from the Green Belt.' That should have been the end of it. However, the very same parcels of green belt land have been proposed, incorrectly, as suitable for infill development within the green belt. It seems that you are attempting to develop housing on green belt land by the back door. GB2 states that there is a general presumption against inappropriate development and it will not be approved except in very special circumstances. Limited infill might be allowed but GB6 only mentions the villages listed in GB7 and to a 'small gap'. There is an argument that these parcels are not infill in any sense. With 200+ houses proposed, they are neither limited nor a small gap. It is however a way of destroying the green belt for ever. Arguments include:1. The Green Belt Policy recognizes that infill in a green belt area may be needed from time to time for exceptional circumstances. An example may be building of houses on a small parcel of land close to the village centre for access to shops and public transport, (Not applicable in this case). The point is that any development using infill in Green Belt land has to be fully evidenced and justified. In this case no justification has been proposed for why infill is appropriate or necessary. The guidance for the development of infill sites within the Green Belt is set out within Appendix 16 GB8 sections 1 to 5. Because this proposal aims to build several hundred houses where previously there was only high quality agricultural land, it would fail all 5 criteria.2. Elsewhere in Appendix 16, a mandatory statement covering development on in fill green belt land states; Development only permitted on the basis that it would be unlikely to have any impact on openness of the green belt. What is being proposed is clearly not consistent with this requirement. The numbers are not clear but a conservative estimate of the number of dwellings is upward of 200, which will replace high quality agricultural land, Habitat and biodiversity. How can that be "retaining the openness of the Green Belt." Based on this alone the proposed use of "Inn Fill" should be removed from the document.3. The National Planning Policy Framework (NPPF July 2018), stated that Green Belt should prevent urban sprawl [information on purposes of greenbelt quoted]</p> <p>CONCLUSION</p> <p>The Infill proposal is deeply flawed because:</p> <p>13. It does not provide a fully evidenced and justified plan and fails to meet the requirements of Appendix16 GB8.</p> <p>14. It breaches the fundamental requirement to leave the same level of openness as exists now.</p> <p>15. It breaches the NPPF July 2018, 5 purposes, particularly the requirement to assist in urban regeneration. This proposal will produce the worst of both worlds; It will destroy the Green Belt and fail on regeneration of the urban areas.</p> <p>16. It will put even more pressure on roads and local amenities such as schools in lower Heswall.</p>

DOR REF	RESPONSE
	<p>WAY FORWARD</p> <p>The council should remove all references to infill, in the context of SP099 to SP104. If these proposals remain in the plan, those landowners and developers who have no interest in the future of the Wirral other than easy money will take it as a signal that they have a green light to develop.</p> <p>The council should focus on getting the numbers right and holding Peel Port's feet to the fire to force them to meet their (contractual?) commitment on the number of houses they will build. They need robust management.</p> <p>Once the numbers are sound and we have Peel Ports under control, everyone should focus on regeneration in the urban areas and leave the Green Belt to be the jewel in Wirral's Crown for future</p> <p>I am completely opposed to the proposal to create what you call, "in fill villages". on green belt land. There is no evidence to support the need. if the proposal were to be included in the plan, it would destroy an important Wirral amenity and the character of the Wirral for ever. The use of the "in Fill" vehicle is a clumsy attempt to develop green belt land by the back door, to swell the wallets of developers. Since I submitted my comments, there have been game changes which need to be evaluated.1. The estimate for the number of houses required over the planning period has reduced dramatically. This is based on changes in forecast by central government, specifically the ONS. This is more in line with the estimate by everyone other than the local council. It is now clear that the new requirements can be met easily, without the use of green belt land.2. The council, however, seems to be pressing ahead regardless, with their favourite option of planning for the development of green belt land. We are already aware that a local land owner has sold parcels of land to a developer. The developer must be confident that he will ultimately get planning permission. I wonder what gave him that confidence. The need for open spaces which have been formalised into green belt land, is more important than ever. this particularly applies to the land to the west of the Wirral way where it forms the coastal strip, with its national and international recognition.</p> <p>The case for the green belt is overwhelming and is supported by central government.</p> <ul style="list-style-type: none"> - They are the lungs of our urban areas and fight pollution. - They provide essential recreational facilities, · - They are a visual amenity· - The provide a habitat for wild life. · - They provide an open space between urban areas. · - They are often prime agricultural land. <p>The benefits of the green belt are enshrined in Law. The so called "in fill villages" are proposed for that green belt land which form an important contribution to that coastal strip west of the Wirral way. Proposed "in fill" development in those areas would be a disaster. Fortunately, if the rule of law is maintained, it is never likely to happen. There appears to be no definition of "in fill" and the use of in fill has never previously been used to describe the land between the Wirral way to the coast. That land has always been and will remain Green Belt land. Each parcel of land has its own story. SP 100 for instance, is described in the draft document as a narrow strip of land. The reality is that it is a substantial piece of high quality agricultural land which has been regularly farmed for decades. Building a housing estate on this parcel of land will be a disaster for the continuity of the open space and will remove prime agricultural land from the farming capacity, just at the time when the government are encouraging more production. The rules and guidance which govern building on "in fill" sites (whatever they are!) are clear:1. There should be a presumption against approving development and only agreed in exceptional circumstances.2. Any proposal must be fully evidenced and justified.3. Any proposal must demonstrate that existing openness will be maintained.</p> <p>None of this has or can been achieved. The so called "in fill" proposal can only be justified on the basis of meeting a need for additional housing, if no alternative exists. It is clear that the revised forecast from ONS that green belt land, including so called "in Fill" will not be required.</p> <p>The whole green belt option should be taken out of the plan, We should work on a plan sourced from brown field sites and Wirral Waters.</p> <p>With the focus on Green Belt Land, the quality of the draft planning exercise has suffered. The consultation has been poor and not inclusive. Not all the supporting papers have been issued. The council has not proceeded in a fair and transparent manner. The council has not followed European Law in preparing the plan. It is based on fabricated figures which were intended to overstate the requirement and therefore justify the need, for Green Field development.</p> <p>It is my opinion that the council is guilty of ULTRA VIRE. It has exceeded its powers.</p>
DOR00412	<p>If you must build new houses then it is going to upset everybody if you build on the greenspace around existing villages that is well used. Instead I heard an idea of building a new 'garden village' near junction 4 and Clatterbridge. I cycle around there and there is plenty of space. Being purpose built it could also include dementia friendly accommodation.</p>

DOR REF	RESPONSE
DOR00413	<p>Having lived at Broadway, Higher Bebington since 1959 and Higher Bebington, since February 1991, I strongly object to the release of Green Belt for building on the fields either side of Lever Causeway, from Mount Road towards Storeton for the following reasons:</p> <ul style="list-style-type: none"> • There is sufficient land in urban areas to build on. • It will fundamentally change the character of the area. • Lever Causeway and its open spaces provide an area for relaxation and exercise for local residents, young and old. • Storeton is an historic hamlet which will be directly affected by any building on Lever Causeway. This will cause irreparable damage to its setting. • Increased traffic and major congestion. • Acres of prime agricultural land will be lost. • The proposed destruction of Green Belt will have a damaging effect on Mountwood Conservation Areas as it will destroy its setting.
DOR00414	<p>I am writing in concern about our Green Belt. Why do we need so many houses? What is this figure based on? Why are both national and local government proposing Green Belt land grab, when their own agreed policies are currently to protect the Green Belt? Why doesn't Wirral council count the land which has already been granted planning permission? What about all the brownfield land that is earmarked for both housing and industrial development in the 'Wirral Waters' scheme by Peel Holdings around Birkenhead Docks? Why are they considering obliterating the ancient character of such villages as Storeton, Barnston and Eastham? Also there is very little guarantee that these houses will be 'affordable' for those that really need them. Am wondering, is this all to do with leaving the EU? Is it a long term plan to get at least one kind of 'industry' going in Britain, which will generate jobs, i.e. people will be needed to build these houses, manufacturers will be needed to supply materials etc.? Or will it backfire and we import materials from abroad? And what about houses which are boarded up - surely it would be cheaper to renovate those?</p>
DOR00415	<p>We are very concerned about the proposal to use previous green belt land to provide unwanted new build houses in accordance with some crazy idea for 12000 new homes in Wirral in the next 17 years. Perhaps these numbers may be required in the London area (where there are jobs) but do we also have to provide jobs for these 12000 households to exist upon? We have lived in Broadway since 1956 and in these 62 years there has been no need to ruin our area by building on the green belt and we understand there is plenty of land in urban areas to build a reasonable number of houses – not ridiculous number suggested!</p>
DOR00416	<p>I wish to register my disapproval of the plans to release of ALL Green Belt Land east of the M53 in Wirral. This will lead to:</p> <ul style="list-style-type: none"> • poorer air and noise quality. • increased traffic congestion on roads already extensively used at present • increased pressure on social and medical facilities in the area, already under strain. I would most vehemently implore you to reconsider these proposals.
DOR00417	<p>I wish to register my disapproval of the plans to release of ALL Green Belt Land east of the M53 in Wirral. This will lead to:</p> <ul style="list-style-type: none"> • poorer air and noise quality. • reduction/loss of valuable open space • increased traffic congestion on roads already extensively used at present • increased pressure on social and medical facilities in the area, already under strain. I would most vehemently implore you to reconsider these proposals' • incalculable damage to the microcosm that is the Wirral peninsula. <p>A decision to build on this land would be irreversible: the initial cost may be a welcome financial boost however the long-term cost to the area, the environment and its residents would be beyond comprehension. I most stridently oppose these plans and suggest attention is turned elsewhere, preferably towards Brownfield sites.</p>
DOR00418	<p>I am greatly concerned regarding the proposals that are being made for the use of Green belt Space in particular the use of land off Levers Causeway. Personally, I cannot understand why this land is being targeted as a first option when Brownfield sites are available for consideration. If we give in to these plans it will result in one consolidated concrete jungle and not represent the Wirral that I chose to move to and set up home. Equally what legacy does this leave to our children. I sincerely hope that this approach will be reconsidered and brownfield options should be the first priority moving forward</p>
DOR00419	<p>As a local resident of Irby, Wirral, we wish to raise our objections to the plans to reduce the amount of green belt in our local area with the potential of additional buildings on the green belt zone. I understand that the projected growth figures for the Wirral have been over exaggerated and not in line with what the local figures estimate. As there is already a surplus of existing empty homes, there does not need to be as much building work competed. In addition there have already been planning applications which have been approved where the work has yet to commence together with other plans which may be stuck in the system. These have not been included in the projected property development and again will reduce the amount of new build properties needed to sustain the potential growth in population. The plan if effected will have a knock on effect on our local area. At present we enjoy our local area and the nature surrounding us. It is an amazing area of biodiversity and natural habitats for nature. The woodlands, footpaths and bridleways would all be potentially at risk and ruin the area irrevocably for future generations. An influx on additional</p>

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	people would also have an impact on the people that live in the area and the services available. There is already pressure on the local doctors, schools etc. and this would make a stretched service even busier. This would also impact the employment opportunities for the local residents and for our children growing up. It may also increase crime rates in the area. Finally, is there sufficient government / local funding for the infrastructure needed to provide access and services to any new development. Any building not profitable for developers would make this more likely to be a more expensive development and not available for local residents.
DOR00420	Same as DOR00177
DOR00421	I bought my house purely on the basis that I was able to walk through the country lanes via this road. There are plenty of Brownfield sites without destroying this beautiful and much loved green belt area. I can't imagine what the traffic would be like with hundreds if not thousands of cars trying to navigate around the double roundabouts at the entrance to Lever Causeway. Even now, there is massive congestion at rush hours.
DOR00422	<p>I am a local house owner in the lever Causeway area.</p> <p>My wife and I are against any development of green belt land in this area.</p> <p>The environmental effect on the area will be very bad .</p> <p>The Traffic increase in the area onto Mount road will be unbearable, it can be bad enough now.</p> <p>The detrimental effect to the local beauty of the area and its historic village by modern housing will destroy Wirral's heritage for ever.</p> <p>We also feel this would be the thin end of the wedge, because once started it rolls on.</p> <p>Why this side of the motorway ? Why not Heswall side.</p> <p>We often walk our dog in Storeton Woods and down the causeway, and love to see the horses, wildlife in the hedges, we fear all this would be lost.</p> <p>We are lucky to live in such a beautiful area of Wirral, please do not spoil it, encourage others to enjoy as we do.</p> <p>There are other areas to develop before destroying Wirral's assets.</p> <p>We often have visitors who often comment on how lovely the area is.</p> <p>Why must we strive to destroy something of beauty because it is the easy solution.</p>
DOR00423	Please accept this email as my objection to release of green belt land to build housing on Lever Causeway and Storeton Road.
DOR00424	<p>I make my complaint against removing existing Green Belt status and the council's future inclusion of site SP061 as developable for housing. I accept that there needs to be an assessment of available, suitable, viable, available and sustainable sites. I also understand that site SP061 forms part of a number of alternative green belt sites under consideration. Of the nationally 'protected' Green Belt sites in this review, site SP061 is the least suitable and also fails to accord with many NPPF policies. Below is a list of my comments set out under each of the key objectives which dictate whether a site is sustainable or not.</p> <p>NPPF Sustainability:</p> <p>NPPF 84. - When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development.</p> <ul style="list-style-type: none"> •SP061 fails to meet NPPF three overarching objectives. •SP061 fails to accord in terms of the requirement for interdependency of these three main objectives. •SP061 fails to achieve net gains across each of the three different objectives. <p>Economic Objective:</p> <p>SP061 is according to Wirral Councils report Appendix 19 – Greatest Need map, is not in any area marked with 'Greatest Housing Need'. Given the lack of any significant meaningful improved employment opportunities or large-scale road and rail infrastructure effecting SP061, new occupants of any new housing will be required to travel for work and increase dependency on vehicle use due to the lack of rail infrastructure and the limited already congested routes to urban areas, employment and services. Therefore, it can be argued that SP061 is not land 'in the right place', will not support or improve innovation or improve productivity but will impede existing resident's access, environment, health and wellbeing. The other sites in this review are better placed to meet economic objectives in line with NPPF.</p> <p>A Social Objective:</p> <p>Of the sites under review, SP061 is least well located in providing legitimate meaningful social objectives. A sufficient number and range of homes can be provided on less sensitive, better located, accessible and less environmentally damaging sites. Development on SP061 would be detrimental to existing settlements diminishing existing open spaces, failing to meet current and future needs which at present the green belt, amenity and biodiversity support communities, health, social and cultural wellbeing. SP061 therefore fails to accord with NPPF sustainability social objective.</p> <p>An Environmental Objective:</p> <p>Deleting the green belt in favour of development on site SP061 does not contribute to protecting and enhancing the natural, built and historic environment as it would also destroy habitat which is occupied by internationally and nationally protected species including Great Crested Newts (GCN). The ponds close by in adjacent fields are there breeding environment but spend most of their lives</p>

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	<p>terrestrially out of water. The site SP061 forms a major part of this GCN range and habitat. Habitat loss due to poorly sited development and loss and degradation of breeding ponds is the main contributory factor in GCN decline. Developing SP061 for housing does not improve biodiversity.</p> <p>SP061 location, if developed would increase pollution, offer no mitigation for climate change and not contribute to a low carbon economy.</p>
DOR00424	<p>NPPF 22 - National Planning Policy Framework and low carbon energy and associated infrastructure. This is central to the economic, social and environmental dimensions of sustainable development. NPPF 109 Conserving and enhancing the natural environment requires: The planning system to contribute to and enhance the natural and local environment by: ●protecting and enhancing valued landscapes, geological conservation interests and soils; ●recognising the wider benefits of ecosystem services; ●minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures; NPPF95. - To support the move to a low carbon future, local planning authorities should:- plan for new development in locations and ways which reduce greenhouse gas emissions; NPPF 110. - In preparing plans to meet development needs, the aim should be to minimise pollution and other adverse effects on the local and natural environment. Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this FrameworkMitigation NPPF 94. - Local planning authorities should adopt proactive strategies to mitigate and adapt to climate change Given that the site SP061 and adjacent sites are a bio diverse habitat rich in some protected species, ponds, grassy meadows and hedgerows and additionally offer benefits to existing residents in terms of health and wellbeing, open space, separation from further settlements and also acting as a wildlife corridor, SP061, in my opinion should not only be protected but enhanced. This would go some way to mitigate and offset the loss of other Green Belt areas of lesser impact. The proximity of the water supply reservoir which would predominately be impacted and threatened by any new development of SP061 could not only be protected but substantially enhanced. Planting of native trees and shrubs and ponds throughout SP061 would mitigate against green belt losses elsewhere, mitigate against carbon emissions, provide greater wildlife habitat, amenity and health and wellbeing net gains making more effective use of land unsuitable for development. This would also further meet environmental objectives of NPPF92:- Community Forests offer valuable opportunities for improving the environment around towns, by upgrading the landscape and providing for recreation and wildlife. An approved Community Forest plan may be a material consideration in preparing development plans and in deciding planning applications. Any development proposals within Community Forests in the Green Belt should be subject to the normal policies controlling development in Green Belts</p>
DOR00425	<p>Please see below reasons for our objections to build housing on Levers Causeway, Mountwood in the Bebington area:</p> <ul style="list-style-type: none"> • There is sufficient land in urban areas to build upon for example Birkenhead Docks. • This will fundamentally change the character of the area. • Lever Causeway and its open spaces provide an area of relaxation and exercise e.g. walking, socialising, running, bike riding, dog walking, horse riding, family gathering etc. • Major congestion and more accidents will occur due to the increased traffic. Thornton Road and small side roads are very busy now during peak hours. • Acres of prime agricultural land will be lost.
DOR00426	<p>The consultation methodology and supporting documents are not presented in an accessible way and are challenging and time consuming to navigate and understand. This is disappointing considering the lasting impact on Wirral residents of the decisions to be made following the consultation. It is intuitively difficult to comprehend the need to release areas of Wirral's green belt for development, given the scale of opportunity for urban regeneration across the borough. The Council should be more ambitious in improving the quality of the environment and residents' lives within existing urban areas which have far from met their potential - as evidenced by poor quality housing, vacant retail units, demolition and dereliction across Wirral, particularly its eastern half. Urban regeneration should be an absolute priority, with opportunities - at Wirral Waters, through the Wirral Growth Company, and in Wirral's ailing retail centres and most deprived areas - exhausted before the release of any green belt land for development. Indeed, the Council states that supporting urban regeneration is a purpose of including land in the green belt. In the case of the vast area to the east of the M53 towards Storeton, Bebington, Spital, Bromborough and Eastham that is being considered, it is clear to me that significant development here could - again referencing the stated purposes of the green belt - merge these distinct areas into a single urban area, leave east Wirral's urban sprawl unchecked, and destroy high quality farming land around Spital. If developed, road infrastructure in south east Wirral could be overwhelmed by the resulting traffic, the pleasant and accessible countryside environment could degrade and the setting of valuable local amenities at Storeton Woods, Claremont Farm and Dibbinsdale could be damaged forever. The inclusion of this area in the review appears to be shaped on a seemingly arbitrary basis that urban development up to the M53 is 'fair game', I do not agree with the M53 representing a boundary for development in this way. If green belt land is required to be released, it should be done sensitively and fairly across Wirral's communities, not loaded against those living on the 'wrong side' of a distant motorway.</p>
DOR00427	<p>We moved here because of Storeton Woods, the conservation area, the green belt which is on our doorstep and the open public area around the village. This is one of the things which help to make Higher Bebington the best location to live in the UK for the last two years. I was therefore annoyed when I heard that Wirral Council is looking to release Green belt for building on the fields either side of Lever Causeway and from Mount Road towards Storeton. They are stating that they need additional house due to a short fall of houses available. Peel Holdings got planning to build the Birkenhead water front with the intention to building houses as part of it. They have now stated they will not build these houses until much later but will continue with the more profitable parts of the planning. Why not insist that Peel Holdings build these houses first which will reduce the need for building on green belt, or compulsory purchase the land back. They should not be able to change what they wish do after obtaining planning permission. There is approx 5000 houses on the Wirral which are empty and un-occupied - these should be utilised first. Green belt once built will never return to green belt.</p>

DOR REF	RESPONSE
DOR00428	<p>Not only do we oppose the building on green belt land in the vicinity of Levers Causeway but also as a resident on Thornton Road, which runs directly on from Lever Causeway, the increase of any traffic generated by construction vehicles and general traffic of any houses build would be of major concern. We already have the inconvenience and difficulty which is created by Tranmere Rovers traffic incurs with parking on both sides of what is an already very busy road. We would be grateful if you would take our opposition and comments into consideration when making any decision regarding building on beautiful and scenic green belt land.</p>
DOR00429	<p>I am writing to tell you of my concern that the greenery around my area is not going to be there much longer. This is my plead that you do NOT go forward with building houses along all the green belts on the Wirral but most of all Levers Causeway. Lever Causeway is my favourite place to walk to : walk my dog , ride my bike , go on walks with my family and I go there because it is one of the few places left on the Wirral that are green and are walkable from my house . Growing up in heavily crowded town would not be safe for children and there would be more traffic accidents. Do you really want to spend more money on avoidable problems? There isn't enough space for the residents to all use our local facilities. For example: The swimming pools, the gyms, schools. What jobs are these people going to get? There is already a shortage for jobs so I doubt that these people are going to find it easy to get a job. All the local primary and junior schools are oversubscribed , meaning the families are going to have to travel a lot further away just to get their children in a school . In my opinion and many other people's opinions this is not fair. This road is going to be too busy for people to drive down and people won't want to walk there anymore. It will become a hazard for me and my family and many more families ,bikers walkers and runners to even walk there because there will be too much traffic. Lever Causeway is very close to Storeton Woods and by building so many houses here would ruin the point of having woods . Did you know that a Dinosaur called a Chirotherium's footprints were found in Storeton Woods and are in Liverpool Museum? No you didn't because you are obviously not paying attention to our beautiful environment or I wouldn't be writing this letter to you. The air we breathe is already filthy so imagine how much more pollution there will be in the air after you build all these houses, and when you do build these houses the road will be all blocked up for months while you build on the last bits of greenery left. Hundreds of creatures and animals and insects homes will be destroyed during the process. How would you feel if someone built an enormous house on top of your home? Have you thought about what this is going to look like because I have? Please DO NOT ruin a perfect environment for my family for other families and for the natural habitat for all the creatures living there and dot be as foolish as to ignore this letter. Have you taken into consideration all of the things above? If so I would love to hear your reasoning.</p>
DOR00430	<p>I totally object to the proposed Green Belt Housing Plan Due to: - The extra amount of added traffic to Mount Road, Higher Bebington-M56 Junction to Storeton Road due to M56 green belt corridor bearing the brunt of 12,500 houses green belt proposal. This road has seen traffic increase threefold in the last 10 years by not only the number of Vehicles using it but by the size and weight of heavy goods transport. It is also without any public transport due to “KEEPING TRAFFIC FLOW”, to the annoyance of the local residents living on or around Mount Road which is an increasing aging community. It is quickly becoming an accident blackspot waiting to happen with the constant traffic users using it throughout the day and night making it one of the busier in the whole of Wirral. The road is very narrow in places and I am sure some of the Heavy Goods vehicles are in excess of the Load and Weight restrictions for this class of road and properly exceeds the original design and planning. Residents of Properties are already affected in many disturbing and annoying circumstances by the large increase of traffic, without the problem of extra properties adding to it or by the heavy vehicles and site excavation machinery developing this land. The area has a History of Quarrying with many Houses built on or around Quarry back filled land. It is worth taking note that many of these existing properties on Mount Road are of a high council tax band and should not have their homes devalued or damaged by traffic vibration to footings, drives and pathways caused by subsidence due to this increase of traffic and the size and weight load of vehicles. There will be an increase of dirt and dust to existing properties created by extra amount of vehicle users and by the heavy vehicles and site excavation machinery in developing this land.</p> <p>Noise and Air pollution will increase due to the constant heavy traffic whilst in the building and post development periods Safety will be at risk to all due to the extra road users (speed limit is now grossly ignored by some road users without any reinforcement and maintenance by Council or Police). Recreational use and access to Storeton woods and green pastures will be impossible to enjoy and partake in by such as Bird watchers, walkers, cyclists and horse riders etc. due to them dodging heavy traffic to get to, or to do such activities. The majority of local residents are TOTALLY against this Plan and expect and require our elected council members to present a UNITED front to solve this problem without loss of any of our valuable Green Belt land</p>
DOR00431	<p>Having viewed the planning proposals for site SHLAA 0684 I would like to express my discontent. We live in a pleasant family orientated area that is enjoyed by all. However, we feel that building on site SHLAA 0684 would have an adverse impact on our community. Firstly, if this 'green space' no longer existed we would see a decrease in local wildlife. Currently we enjoy seeing a variety of different wild animals and birds which is great for all ages to see. We feel that this would change this aspect of lifestyle that we love. Additionally, this is the only open green space in the immediate area. If this was no longer there, there would quite literally be houses as far as the eye could see. Secondly, as we are in an area with a school and where many young children live, it is thought that the creation of more houses will bring with it more traffic. This is likely to negatively influence road congestion and safety for pedestrians. Where our house is situated we already have problems turning into our drive due to the business of the road and drivers breaking suddenly when we turn (this also occurs when turning to Brookhurst Road). This potential danger will be heightened with the introduction of more traffic.</p>

DOR REF	RESPONSE
DOR00432	<p>I believe that the green and open space across Wirral is one of its unique aspects that make it a pleasant place to live and work. I fundamentally disagree with removing any areas of land from the green belt. Based on current ‘actual’ data and recent population growth and trends the targets for new homes seem unrealistically high. Especially since the release of the latest ONS data. I do not believe that the council have examined fully all other reasonable options for meeting its identified needs for development by:-</p> <ul style="list-style-type: none"> • Examining all brownfield sites potentially available • Properly assessing the maximum capacity for building on those brownfield sites (based on typical building densities for affordable housing development) • Fully considering the capacity in the Wirral Waters development and working up a proper plan for delivery in that area • Considering other capacity that might be available including empty homes on the Wirral and housing that is/being developed across the Liverpool City Region. It has therefore not identified the “exceptional circumstances” needed to change existing green belt boundaries. <p>In my view current government policy and guidance seems to have a presumption against changing the extent of green belt in the preparation of a local plan simply to accommodate an objectively identified housing need. The fundamental aim of green belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of green belts are their openness and their permanence.</p> <p>The current proposals will :</p> <ul style="list-style-type: none"> • Encourage the unrestricted sprawl of built up areas • Merge neighbouring small towns and historic villages and settlements with that urban sprawl • Not preserve the countryside from encroachment • Considerably take away the focus from urban regeneration (particularly at Wirral Waters) which is of much higher priority for the long term health and success of Wirral. There is significant emerging evidence from across the country that releasing green belt land does nothing to tackle the need for affordable housing but merely allows developers to cherry pick sites for executive development. <p>I have been made aware of an error in your Summary of Initial Green Belt Assessment September 2018. On page 52 the agricultural land use for SP030 has been classed as pasture and horse grazing. In fact, the land under SHLAA1819 on site SP030 is actually used for farming arable, and has been for many, many years. Recent soil reports show the site as containing very good quality soil. SHLAA1819 has already had a crop harvested this year and is currently growing winter wheat. The land further down Lever Causeway between Marsh Hey Covert and Little Storeton Village is also being farmed. Therefore a very large proportion of SP030 is actually used for arable farming and not horse grazing as indicated. At a Council Meeting on 15 October, Motion 3 was voted on and carried unanimously. The first paragraph of this motion reads, "This Council requests that renewed importance should be attached to the protection afforded to agricultural land as the responses to the Local Plan are considered. Land that is currently in productive agricultural use should not be removed from the Green Belt in view of the need to safeguard future food supplies." I have attached a photo of the field in question. It was taken on 17/6/2017. As you can see, it's full of wheat. I've also attached a screen shot of page 52 of the Summary of Initial Green Belt Assessment.</p>
DOR00433	<p>What's wrong with our labour led council? It's time they worked for and listened to the people they have been elected to serve. The plans to release all green belt land is not in our interests nor is it sensible with our congested roads and poor public services as it is. I must ask if this could be politically motivated.</p>
DOR00434	<p>The fact that the green belt land is even being considered for building on is a disgrace. Spital/Bebington benefits from an urban/rural community, that's why people live here! The proposals to build on this vast green belt land is outrageous. Claremont and Vineyard farms are successful family businesses which relies on the surrounding land for growing produce and for livestock, this proposal could see an already difficult occupation of farming become an impossible task if the green belt land is used for building. We should be supporting our local producers not punishing them with these plans to remove vital land. Local primary schools are at capacity, local medical centres are struggling to cope with current demands and the roads are already congested. What will happen when more houses/cars/families are added to this problem? The council can't maintain the current roads and pavements (the pavement in my street (and surrounding streets) are full of large weeds) so how are the council expecting to cope with numerous new housing estates which will require upkeep!?</p>

DOR REF	RESPONSE
DOR00435	<p>The containment analysis highlights less than a 50% adjacent boundary and therefore classified as poorly enclosed. Building in poorly enclosed areas and taking up valuable green belt without economic, social or environmental benefit goes against the NPPF and would classify this site and surrounding sites (SP062) as unsustainable. Within the appendix there are 35 sites with a higher proportion of urban boundary. Building on SP061 would reduce and remove physical separation between neighbouring towns. It should also be said that if SP062 was to be considered also, this would result in Thingwall, Barnston, Heswall and Pensby merging. SP061 fulfils all 5 purposes laid out in below section 13, paragraph 133 & 134 of the NPPF. Considering SP061 & 062 in the Local Plan would completely contradict the guidelines set out in the NPPF. SP061 is home to the protected Great Crested Newt and can be found in the back garden of local residents.</p> <p>1) Highways - The highways infrastructure in the Thingwall & Pensby area struggles to meet the needs of the current population within this area. There are major bottle necks within the road network with a series of dangerous ‘rat runs’ – Additional traffic within the area would undoubtedly jam the road network and create an unsafe environment for road users.</p> <ul style="list-style-type: none"> • Blind junction Gills Lane • 5 Way Traffic lights Gills Lane • No Public Footpath Gills Lane & Barnston Road • Single carriage way Stourton Lane and Gills Lane • Narrow & Dangerous bends at Fox & Hounds (Barnston) • Roundabout at Landican jammed with 0.7m tail back from Arrowe Park • Hooton – Major delays from three to two lanes. • Arrowe Park tail backs blocking access of emergency services <p>For the above reason I believe SP061 and land within the green belt in Thingwall & Pensby does not meet any of the three objectives from the NPPF.</p> <p>It does not: A18 Make us stronger, more responsive or competitive in our economy – Its slows us down and puts us at risk</p> <ul style="list-style-type: none"> • Support a healthy community or provide a safe environment – It Increases risk • Minimise pollution or move us towards a lower carbon economy <p>2) Access to Rail Network - The Thingwall & Pensby Area has no access to a rail network unlike Hoylake, West Kirby, Meols and Moreton. This is severely restricting and additional housing in the area will only contribute negatively to the environment through increased carbon emissions generate by motor vehicles. There are more sustainable site which can be selected which meet the needs of present and protect without compromising the needs of generations in future. SP061 does not meet any of the three objectives from the NPPF.</p> <p>It does not:</p> <ul style="list-style-type: none"> • Improve productivity • Have accessible service and open spaces for future need • Mitigate or adapt to climate change – it adds to the problem <p>3) Pressure on Local Amenities - There are very few local amenities as it stands, and even the few key ones which we do have it is a struggle to park safely and access them. There are very few local amenities in Thingwall</p> <p>4) Wildlife - GB Parcel SP061 is ripe with wildlife some of which protected. Great Crested Newts are frequent visitors in the gardens backing on to this hay field. Additionally, this land provides resting ground and cover for migratory and ground nesting birds.</p> <p>5) Cross Hills Reservoir - Cross Hills is located inside GB Parcel SP061, all the Wirral’s water passes through this reservoir for treatment. It enters and exits through 1 single pipe. Building within the vicinity of this water network poses risks (No matter how small) to the water quality / safety. Building around Cross Hills would negatively impact the established natural boundary which clearly defines the separation of Thingwall and Barnston.</p> <p>6) Schools - Thingwall & Pensby Schools are at capacity and many children are now traveling further afield to their Second and Third choice schools. Adding the number of houses potentially proposed in the area would further increase this strain. The proposed addition of houses in this area would only warrant ‘half a school’ so to speak.</p> <p>7) Site of historic importance - Land Parcel SP061 was / is of historic importance having been the location of early roman settlements.</p> <p>We as residents of Thingwall are extremely frustrated that the Labour Council has ignored the growing need for housing and failed to implement a successful Local Plan since around 2001. The plan rejected in 2012 also ignored the fact that there is not enough brown field land to keep up with the demand. This has resulted in to Government stepping in and turning up the pressure on the local council to deliver a plan in a very short space of time. The Labour Council has failed in their duty to protect residents of the Wirral and those within your individually held wards. How do you plan to address the significant green field land which could be swallowed up by the new local plan. The land within your ward being North and South of Gills Lane. There are several reasons why this particular parcel of land (SP061 & 62) is not sustainable, however, I would like to know what your opinion on the matter is and specifically what your arguments are against using this land for housing. Please share your arguments against the proposal directly linked to the national planning policy frame work. This is an opportunity for you to show why we should continue to support the Labour Council in future elections. We look forward to your swift response.</p>

DOR REF	RESPONSE
	<p>I make my complaint against removing existing Green Belt status and the council's future inclusion of site SP061 as developable for housing. I accept that there needs to be an assessment of available, suitable, viable, available and sustainable sites. I also understand that site SP061 forms part of a number of alternative green belt sites under consideration. Of the nationally 'protected' Green Belt sites in this review, site SP061 is the least suitable and also fails to accord with many NPPF policies. •SP061 fails to meet NPPF three overarching objectives.</p> <p>•SP061 fails to accord in terms of the requirement for interdependency of these three main objectives.</p> <p>•SP061 fails to achieve net gains across each of the three different objectives. SP061 is according to Wirral Councils report Appendix 19 – Greatest Need map, is not in any area marked with 'Greatest Housing Need'. Given the lack of any significant meaningful improved employment opportunities or large-scale road and rail infrastructure effecting SP061, new occupants of any new housing will be required to travel for work and increase dependency on vehicle use due to the lack of rail infrastructure and the limited already congested routes to urban areas, employment and services. Therefore, it can be argued that SP061 is not land 'in the right place', will not support or improve innovation or improve productivity but will impede existing resident's access, environment, health and wellbeing. The other sites in this review are better placed to meet economic objectives in line with NPPF.</p> <p>A Social Objective: Of the sites under review, SP061 is least well located in providing legitimate meaningful social objectives. A sufficient number and range of homes can be provided on less sensitive, better located, accessible and less environmentally damaging sites. Development on SP061 would be detrimental to existing settlements diminishing existing open spaces, failing to meet current and future needs which at present the green belt, amenity and biodiversity support communities, health, social and cultural wellbeing. SP061 therefore fails to accord with NPPF sustainability social objective.</p> <p>An Environmental Objective: Deleting the green belt in favour of development on site SP061 does not contribute to protecting and enhancing the natural, built and historic environment as it would also destroy habitat which is occupied by internationally and nationally protected species including Great Crested Newts (GCN). The ponds close by in adjacent fields are there breeding environment but spend most of their lives terrestrially out of water. The site SP061 forms a major part of this GCN range and habitat. Habitat loss due to poorly sited development and loss and degradation of breeding ponds is the main contributory factor in GCN decline. Developing SP061 for housing does not improve biodiversity. SP061 location, if developed would increase pollution, offer no mitigation for climate change and not contribute to a low carbon economy. Given that the site SP061 and adjacent sites are a bio diverse habitat rich in some protected species, ponds, grassy meadows and hedgerows and additionally offer benefits to existing residents in terms of health and wellbeing, open space, separation from further settlements and also acting as a wildlife corridor, SP061, in my opinion should not only be protected but enhanced. This would go some way to mitigate and offset the loss of other Green Belt areas of lesser impact. The proximity of the water supply reservoir which would predominately be impacted and threatened by any new development of SP061 could not only be protected but substantially enhanced. Planting of native trees and shrubs and ponds throughout SP061 would mitigate against green belt losses elsewhere, mitigate against carbon emissions, provide greater wildlife habitat, amenity and health and wellbeing net gains making more effective use of land unsuitable for development</p> <p>[Various NPPF'S Quoted]</p>
DOR00436	<p>As a concerned resident I am now aware of the newly released figures from the New Office for National Statistics. This figure is far lower than the original figures that have been banded around and as a further consequence of my disapproval for building on any Wirral Green Belt, this by far endorses the reality that there is absolutely no need whatsoever to do so with all the existing Brownfield sites that you have available to use for housing needs. I trust you will take heed of these new figures and my profound concerns and also listen to the other residents of Wirral In realising that our Green Belt is a very precious commodity which is loved and enjoyed by all and certainly not a commodity to lose. I was recently disturbed to find out that our beautiful landscape was up for release to allow for new housing. I am totally perturbed as to how you find that you are entitled to release "Greenbelt" land whenever you chose to, probably to gain a few coffers no doubt, when there is so much land laid to waste, making areas of the Wirral look an eyesore. The latter is obviously not high on your priority list as you seem to prefer the demolishing of such beautiful areas as the Lever Causeway which is enjoyed by many, walkers, runners, dog walkers, horse riders and much more. I was walking down the said road this morning and saw Canadian Geese, Squirrels, a woodpecker and even a fox. Walking takes minds off daily life, destressing, and unwinding. Looking around at the beauty of the fields with horses grazing, and the wildlife getting on with theirs is very relaxing. To lose this would not only destroy the lives around, but also the wildlife. Another problem would be that people would need to travel in their cars to travel to areas to walk, which means car pollution, parked cars blocking roads etc., as people don't walk to walk through housing estates! At present we can walk to the top of the Lever Causeway, and that's where the beauty and walks, runs begin - right on our doorstep.</p> <p>The traffic coming from Heswall is immense in itself and causes problems in a morning. Adding extra traffic from housing estates would cause even more traffic queues to the roundabouts at the end of the Lever Causeway/Mount Road junctions. Where would all these new families go to school, the schools are already at busting point. What about doctor's surgeries, they can't possibly cope with many more, appointments are hard enough to come by as it is! All this needs to be taken into account. DON'T DESTROY WHAT GREENERY WE HAVE LEFT, VISIT WIRRAL AND SEE THE SIGHTS THAT NEED DEVELOPING - GET RID OF THE EYESORES THAT SCORCH THIS LOVELY PENINSULA.</p> <p>Further to my previous email, we don't feel that there is any need to release any Green Belt due to the new Office for National Statistics figures and the brownfield sites available on the Wirral. In light of the recent threat to the country, especially the Wirral, losing a large percentage of their green belt to housing estates, I just had to write this personal email [description of respondent's health issues]. I have walked down the Levers Causeway and around the fields and lanes of the local area now for the past 9 months and this has given me back my health. Walking around this beautiful landscape during the day, sometimes early in the mornings, not only helped me physically, but, mentally. Walking around and talking in the scenery, horses galloping in the fields, foxes,</p>

DOR REF	RESPONSE
	<p>birds etc., was and still is a very therapeutic pastime. I'm not the only one, I see many people walking, running, walking their dogs, cycling, out walking with their families, horse riders, etc., all out taking in and enjoying the landscape around us. Building on the green fields, Lever Causeway in this instant, would take this enjoyment away from so many people.</p> <p>There are so many other options to you. As you drive around the Wirral, you can see so many houses boarded up, property that has been left derelict, areas where buildings have been knocked down and left empty, in some instances for years. The likes of Peel Holdings that own so much land that has been left barren. I hear of families that have been in their homes for years and love where they live, yet have been forced out by Compulsory Purchasing Orders so that you can build highways, motorways and airport extensions. Why not, put such an order out to those who purchase property, tear them down and leave it just so they can boost their "land banks" and line their pockets if they haven't built on them after say five years? Please, please, think again about using our green belt.</p> <p>[SAME AS DOR00455-ALSO ATTACHED] [NPPF 13.134 QUOTED]</p>
DOR00437	<p>I am writing to express my disgust at the proposals to develop large swathes of green belt land around Storeton and Bebington.</p> <p>In my view Wirral does not need an additional 12000 homes. This is a small, already congested peninsula which also has some beautiful areas of green land which is used very regularly by local residents and visitors. Any developments in this area will fundamentally alter the character of this lovely area. I also believe that once the precedent is set, development will continue with greedy developers and land owners building more and more properties. This area will not attract social landlords to build the type of housing desperately needed nationwide. Land prices will be too high so only high priced luxury houses could be built here. There is also a risk Storeton and Bebington could merge creating one large town. Storeton is an historic hamlet which risks being overwhelmed by developments.</p> <p>The area's roads are already busy enough along Mount Road and Levers Causeway with the proximity of the motorway so more houses will simply add to the congestion.</p> <p>The whole of the Wirral has large areas of undeveloped brown field sites with the Birkenhead and Wallasey waterfronts being ripe for development. Pressure needs to be brought on Peel Holdings and others to build the houses needed in areas which will not impact on the residents of this lovely part of Wirral. Bebington was recently voted the best place to live in the country. This will no longer be the case without the nearby countryside.</p> <p>I sincerely hope the views of those of us who will be severely affected by the development of our area will be seriously considered.</p>
DOR00438	<p>I don't feel that there is any need to release any Green Belt due to the new Office for National Statistics figures while the brownfield sites available on the Wirral. I am writing to express my views, as a Wirral resident, AGAINST the proposal to build new housing on Wirral Green Belt land. I attach a letter explaining the reason for this decision. I would like to highlight an error in the Local Plan which affects Lever Causeway and in particular site SHLAA 1819 in strategic parcel SP030 (the field directly behind Stanley Avenue). In your Summary of Initial Green Belt Assessment September 2018. On page 52 the agricultural land use for SP030 has been classed as pasture and horse grazing. In fact, the land under SHLAA1819 on site SP030 is actually used for farming arable, and has been for many, many years. Recent soil reports show the site as containing very good quality soil. SHLAA1819 has already had a crop harvested this year and is currently growing winter wheat. As a matter of fact, it produces crops harvested regularly at least twice/year. The land further down Lever Causeway between Marsh Hey Covert and Little Storeton Village is also being farmed. Therefore a very large proportion of SP030 is actually used for arable farming and not horse grazing as indicated. I have attached a photo of the field in question. It was taken on 17/6/2017. As you can see, it's full of wheat. I've also attached a screen shot of page 52 of the Summary of Initial Green Belt Assessment. [Photograph attached]</p>
DOR00439	<p>After the recent published altered figures by the National office for national statistics I see no reason why you should push ahead with your objectives to cause misery and worry to quite a number of Wirral residents by taking large swathes of land out of green belt. Perhaps I been cynical when I'd always thought the back nine holes of Brackenwood Golf course has longed been earmarked for building. Please prove me wrong. Perhaps now is a good time to step back and treat the affected Wirral public as people and not statistics. Thank you for your time in serving the community</p> <p>Hoping you give this and many more similar comments your deepest concern</p>
DOR00440	<p>The approved Settlement Areas were therefore used as the basis for the analysis contained within the Council's recent Initial Green Belt Review, which was recently published for public comment. The parcel of land referred to (referred to as SP060 in the Council's recent consultation documents) is already physically enclosed by the wider urban area, which means that its impact on urban sprawl would be much less when compared with other parts of the Borough, hence its identification for further investigation. That said, the Council's Cabinet will be considering all the comments received on 17 December before they come to any final conclusions. I assume that the constituent will already have made separate representations to the consultation but if not, I am happy to add the constituent's comments to the formal responses to be reported to Cabinet.</p>

DOR REF	RESPONSE
DOR00441	<p>We would object strongly to any proposals to release green belt on the Wirral.</p> <p>We are particularly concerned about the inclusion of strategic parcels SP012 and SP013.</p> <p>My main concerns are:-</p> <ul style="list-style-type: none"> Loss of visual amenity Loss of countryside/green spaces Impact on Stapledon wood Blurring of Newton and Caldly Pressure on local schools Pressure on local transport network <p>I would also like to raise a concern over buildings being erected at Column Road. I have located planning applications, both of which refer to wooden agricultural buildings.</p> <p>The buildings being erected on green belt are in fact concrete and breeze block.</p>
DOR00442	<p>To whom it may concern I have received news that Wirral Council plans to release Green Belt land for building on the fields either side of Lever's Causeway, I was so horrified at this proposal I needed to voice my objections in the strongest possible terms. I live in Regents Way, higher Bebington, so very close to the proposed development. Only yesterday my children and I walked down Lever's causeway as we often do now that the path has been built to the right. This area has unrivalled views and beauty and essentially makes the heart of Higher Bebington what it is and why it is currently such an attractive place to live. To propose building on this area is tantamount to destroying the heart of Higher Bebington. Not only would the road, which is already a very fast race track already become more congested but the whole amenity/charm of the causeway, fields and woods would be lost forever. I am sure anyone who knows and loves the area, particularly Bebington would agree and be equally horrified at the proposal.</p> <p>I used to live in [local area] the area was quaint and full of character. Patchwork development has now fundamentally changed that area and not for the better, Village Road is now almost impassable. Please please do not ruin the truly beautiful views from Mount Road and enlarge an area that is community focussed and does not require expanding further.</p> <p>In the summer my family and I use the path along Lever's causeway constantly as do many locals and to have housing either side would not only loose acres of green belt forever but destroy the outlook and amenity for everyone. There must be hundreds of additional areas to developed e.g. brown belt please do not ruin our beautiful town and make the roads more congested and dangerous for our children. Higher Bebington was recently voted the most desirable postcode in the country because of its balance of amenity/rural charm and easy commutes to work, building as proposed would upset this balance forever. The corner of Broadway from Mount road is already treacherous as cars don't slow down because the corner is wide and additional traffic will completely contest the whole area. I hope someone in the decision making process listens to the objections from locals that I'm sure will follow to this proposal and dismiss this proposal out of hand. Trusting my comments can be considered and listened to. I will also write to the Secretary of State for Housing with my objections.</p>
DOR00443	<p>The many empty houses and brownfield sites could be used before destroying The Green Belt. Lever Causeway provides space for relaxation and exercise for many people where they can also enjoy beautiful views. These would be replaced with Increased traffic and major congestion - Not a good plan.</p>
DOR00444	<p>I am emailing you to register my opposition to any consideration by the council that this green belt land should be used for building new houses. These green belt areas provide vital open spaces that help define villages/towns and give the local inhabitants chance to escape the built up, noisy and polluted settlements. Lever Causeway and the surrounding land is an historic landmark which allows people to easily escape into the countryside and enjoy the woodland and open green fields. Building alongside the Causeway would not only diminish the uniqueness of this stretch of road but would destroy the open space around it and impact of local wild life. There are many brown belt areas in the Wirral that could be used to build social housing and allow the green belt areas to remain untouched and enjoyed by future generations. The countryside must be protected from such encroachment and the unnecessary sale of green belt land is, quite frankly, a disastrous way to solve the housing problems on the Wirral. I urge you to make the right decisions to protect our open spaces</p>
DOR00445	<p>I feel that I have to strongly disagree and object to the proposals by the Wirral Council regarding the releasing of Green Belt Land. There is so much information most of it produced and quoted by the Council that shows that Green Belt Land should not be the first choice to build on especially if it is existing farm land.</p> <p>There is enough Brownfield Land and Planning consents in the system which should be used first to satisfy the projected housing needs for Wirral for the foreseeable future. I hope the council sees some common sense and take note of its own figures regarding future housing needs and not some unknown Whitehall Politician.</p>

DOR REF	RESPONSE
DOR00446	<p>In relation to the housing consultation letter, I have forwarded the attached news report. Surely this can form the basis of challenging the government push to build more houses. This report outlines that by simply building more homes, we are not solving the housing issues this country faces. The housing problems differ from region to region and simply building more homes across the country will not solve the problem. Wirral is unique and I strongly oppose any further building on green belt land. When we build more houses, we need to consider the infrastructure around them. Are there enough schools, transport links etc...? Many of our schools in the areas you want to build in are already at capacity and as such we cannot service more families. We should be pushing the Peel group to stick to their original development quota for the brownfield sites they own. The reason I understand for their failure to build the original quota is because of influence regarding Liverpool's propensity to lose its title as a world heritage site. Whilst I can understand people's concerns about this, surely our county shouldn't have to suffer because of this? Surely it is preferable to develop brown belt land and not to build on green belt. We should also be spending money on trying to encourage people to have smaller families to prevent future strain on the housing market.</p> <p>[Web link attached]</p>
DOR00447	<p>The following is a summary of the arguments against the Council's proposals</p> <ul style="list-style-type: none"> • The proposals breach four of the five purposes of the Green Belt as set out in the NPPF. • The proposals are in breach of the policies for Eastham defined in the current Local Plan. These include: • Council's policy CH10. This policy is based on the recommendations of the Appraisal and subsequent Management Plan for Eastham Conservation Area, both of which were adopted by the Council in 2009. • Strategic Policy CHO1 - The Protection of Heritage . • Policy CH2 - Development affecting Conservation Areas. • Policy CS7 - Priorities for Bebington, Bromborough and Eastham. • Policy CS11 - Priorities for the Rural Areas • The proposals ignore the adopted further strengthening policies in the Special Guidance Notes (SPG 24) for Eastham Village • Landscape Character Assessment - Eastham Wooded Landscape; this is mentioned but ignored. • There appears to have been no consultation with the neighbouring authority - Cheshire West. What if this authority also uses the M53 motorway from their side as a 'strong boundary'? What are their plans for the adjacent green fields? They have already permitted a large development in the Green Belt off Rivacre Road with no consultation which has impacted badly on Eastham Village with increased traffic. <p>SPO50 - Limited impact</p> <p>'Limited impact' is a subjective term; we suggest that any 'development' would have a major impact and is clearly in breach of purposes a, b, c, and d of the NPPF. The North Road and Manchester Ship Canal industrial developments have largely been established without the need for planning permission and this planning failure cannot be used to further exacerbate this 'accident'.</p> <p>Options - Option 50.2 - the release of all the land covered by SPO50 to 55 would effectively get rid of the 'separation' required to maintain the status of the Eastham Conservation Area, by obliterating all the Green Belt on all approaches to the village.</p> <p>Option 50.1 - Agree</p> <p>Option 50.2 - Unacceptable</p> <p>Farm Land - Best quality farm land would be lost.</p> <p>Pollution - The A/41 is already a polluted and exceptionally busy road, to add more traffic and more junctions to it is simply unacceptable.</p> <p>Archaeology - The field was home to one of Wirral's earliest windmills, owned by the Stanley family of Hooton Hall. The fields incorporate an ancient ha-ha that protected the grounds of Eastham House. They are also dissected by engraved, rare boundary marker stones - see photo lower left.</p> <p>The emphasis throughout this document seems to be how to develop the Green Belt rather than how to protect the Eastham Conservation Area and the buffer zones that surround it.</p> <p>SPO51 - Remaining open land</p> <p>It is this 'remaining open land' – that has protected Eastham and its Conservation Area from the onward march of the tank farms and industry. It is a critical site for the survival of the Eastham Conservation Area in its setting. Trees and hedges serve to hide the ugly outlines of the tanks.</p> <p>Rivacre Road - Rivacre Road is a narrow country lane with poorly maintained boundaries which thanks to the Council being unwilling to control the increasing traffic through the village to Ellesmere Port has already seen one recent fatal accident. The residents of Merton Road and Dudley Crescent as well as the house on the former airfield would be overwhelmed by any development whatsoever on this land.</p> <p>Subjective comment - 'Limited impact etc.' - again a subjective comment with the 'wish being father of the thought'. Again "without significantly further compromising the east-west separation".</p>

DOR REF	RESPONSE
	<p>We disagree – development would very significantly compromise the separation that is critical to the Eastham Conservation Area – so critical is this separation that it is mentioned several times as possibly the most important factor in the conservation of Eastham Village - in its setting. Any ‘development’ of this land will have a major impact and is clearly in breach of 4 of the 5 purposes of the Green Belt i.e. - a, b, c, and d.</p> <p>Farm Land - Best quality farm land would be lost.</p> <p>SPO52 - Infilling and ‘limited impact’</p> <p>Infilling already occurs within the village where vacant plots are easily identified as being suitable for carefully designed housing. The Appraisal recognises that “Eastham Village has successfully maintained a degree of separation from neighbouring built up areas. The Green Belt surrounding the village has helped in maintaining this separation. Playing fields provide a break to the north and west and the grounds of Eastham House and Eastham Hall to the south and east. There are agricultural areas beyond to the south and east”. This factor is picked up by the Management Plan and is reflected in the various Council policies for the Eastham Village Conservation Area. Of course ‘infilling’ will have an impact and a major one - the words are subjective.</p> <p>Strong Green Belt Boundary - Elsewhere in the Council’s proposals a ‘strong Green Belt boundary’ is seen as a positive factor, but here there is a strong green belt boundary – the A/41 or New Chester Road and the original 1922 by-pass of the village.</p> <p>Worthless Controls - The options talk of Conservation Area controls remaining in place, but these so called controls are worthless as in January 2018 the Council granted planning permission for 21 houses on Green Belt land that was also within the Conservation Area to provide funds for a failing sports club. The same applies to the suggestion that ‘Urban Greenspace could be an additional protection – this council has a record of ignoring its own policies with complete impunity.</p> <p>SPO53 - Impact Again the commentary states “which could potentially be extended with little impact on separation or open countryside.” This subjective view is clearly impossible to verify. There will certainly be an impact on separation or open countryside - that appears to be acknowledged, but how can you know how ‘little’ that might be? Has the writer taken account of the extra traffic that more housing will generate? Is the writer aware of the 1949 Ship canal Act? We are sure that Local Government officers are doing their best but that is no substitute for Local knowledge. We suggest that the impact will be a large one.</p> <p>The area of land is small but it is crucial to the ambience of Eastham, its woods, its ferry and its history. The impact would be better described as significant.</p> <p>SPO54 - ‘Separation’</p> <p>This site provides the required and fundamental ‘separation’ and ‘open aspect’ that is critical to the Eastham Conservation Area. Not only that but it is also land that is used mainly for sporting activities. The site borders Ferry Road and is an essential scenic element in the approach to Eastham Ferry and Eastham Country Park. The proposal violates the Council’s policies for Eastham Conservation Area, it is in breach of the required necessary separation between Settlement Areas 4 and 8, and it breaches four of the 5 ‘purposes’ of the Green Belt. Once again there are so many alternatives provided in both the substantive opening paragraph and within the following options themselves that it is impossible to come to a conclusion.</p> <p>Council’s poor track record - Given the Council’s track record in ignoring their own policies in Eastham it would be neither wise nor acceptable to rely on the protection offered or suggested, i.e. Urban Green Space or Sports Grounds for Protection from Development Issues.</p> <p>Missing option - Again the missing option is ‘To keep in the Green Belt’.</p> <p>SPO55 - Remaining area of open land</p> <p>The opening line is significant – “Remaining area of open land overlooking the coast”. Again we have the subjective phrase “could potentially be released from the Green Belt or added to the adjacent Infill Village (SPO53), with no further impact on separation or open countryside”. Of course it will have an impact on the open countryside – the implication in the Council’s opening line admits it</p> <p>There are principally 5 reasons why none of these sites should or indeed could be made available by being removed from existing green belt.</p> <ol style="list-style-type: none"> 1. Barnston Road is an accident blackspot. As long ago as 2005 while considering the exclusion of articulated vehicles from Aldi from the road WBC and Barnston Conservation Society each commissioned reports which said the same thing namely that introducing such traffic would lead to death or serious injury. Since that date WBC has recognized the road as a blackspot by placing warning signs to that effect at either end. Since that date traffic has increased incrementally. If you build 50 houses on any of these sites you increase the vehicle numbers by 100 and thereby take the foreseeable risk of serious injury or death. Any death which followed would make the Council liable for criminal prosecution for Corporate Manslaughter. No consolation for the Deceased. 2. You build houses near to a reservoir at your peril. As the 1975 Act recognizes any serious accident at the reservoir would have catastrophic results. Don’t rely on United Utilities, the take 7 years to act. 3. The houses built around Gills Lane were joined to the existing sewer system which runs through Barnston Dale filed parallel and in places in Prenton Brook which runs into the river Birkett. 10 years ago that sewer burst in several places polluting the brook and causing sink wells in the field. It took the Society 3 years to get United Utilities to admit that it was their sewer and a further 4 years with the help of the MP to get them to repair it. It now runs to full capacity. Any building in that area would require massive new infrastructure costing many millions. 4. All the land under consideration is presently farmland. Any building on that land makes the acreage automatically unviable. To do so would also be contrary to the Councils avowed policy towards the support of agriculture.

DOR REF	RESPONSE
	<p>5. In any event land may only be removed from the greenbelt in Exceptional Circumstances. Exceptional Circumstances are a matter of Law and not the will of the Local authority. In particular the preparation or need for a Local plan is NOT an Exceptional Circumstance. (See: Gallagher Estates and anor.v.Solihull MBC)</p> <p>I am confident in saying that removal of any land from this green belt is almost certainly unlawful and will be challenged in the Courts. I say almost certainly as my experience is as a Criminal Lawyer for 50 years and planning was never my speciality.</p>
DOR00448	<p>I write to strongly object to the release of Green Belt land in Wirral, notably the area in Heswall designated SP07 1 on the Forward Planning proposals, for new housing. Green Belt land around towns is necessary to prevent urban sprawl while its use for farming should be encouraged in order to help feed the population in future. With reference to the open letter from [council leader] dated August 2018, any need for housing development is not a sound enough reason to release Green Belt to fulfil Wirral's Local Plan. Wirral's Local Plan</p> <p>I had attended your officers' helpful presentation on the subject of the Wirral Local Plan and Green Belt Review at Pensby High School on 13th September 2018. Your officers' explanation of the projected number of new houses required on Wirral was unconvincing. The stated figures are apparently not based upon the demand for new housing which is primarily linked with industrial and employment growth. House building on the proposed scale would therefore lead to an increase in the number of empty properties, particularly in areas which are currently in need of regeneration. The fact that there is a perceived shortfall of house building in the recent past supports the hypothesis that demand for housing on Wirral is not rising to the extent anticipated. The excellent joint "Wirral Waters" initiative between Wirral Council and Peel Holdings regarding the "Brown Field" development of the Birkenhead docks area will provide both jobs and housing. The Council's first priority must surely be to ensure that this initiative successfully delivers both industrial growth and the housing expansion envisaged in the Local Plan. I understand that it is a clear objective of Government to protect the nation's Green Belt, virtually at any cost, and to encourage developers to build on Brown Field sites and, to that end, that a press release on 5 March 2018 from the Ministry for Housing, Communities and Local Government had emphasised that councils should prioritise Brown Field sites for redevelopment. The release emphasised that Green Belt land should be preserved and protected and that urban sprawl should be limited as much as possible; thus only in the most exceptional circumstances could any type of development be approved on Green Belt land. Furthermore I understand that, in July 2018, the Government published guidance in the National Planning Policy Framework aimed at protecting Green Belt land, paragraph 145 stating that development of Green Belt areas could only be approved in very special circumstances which outweigh the resulting harm to the environment. I particularly object to development of the area in Heswall designated SP07 1 on the Forward Planning proposals. This plot is alongside the Chester Road (A540) and, other than the existing ribbon development alongside the road, has much inherent natural beauty, ecological value and agricultural purpose with little, if any, scrub land.</p> <p>In addition to the adverse impact on the environment of building a new housing development in this area:</p> <p>a) Any new access route via Suncroft Road through the existing residential area would be dangerous. Existing roads in the area are narrow, busy in school time and suffer from a large number of cars accessing Barnston Primary School, safe parking proving difficult to find with some drivers resorting to using the pavement, a practice which we understand Wirral Council seeks to discourage. The intensive use of Sandham Grove and Broadmead is also demonstrated by the constant problem of potholes.</p> <p>b) The adjacent main road to the M53, Brimstage Road, having a low bridge over the railway and then a 50mph speed limit for much of its length notwithstanding the many bends in the road including those through Brimstage village, is already busy and hazardous.</p> <p>d) The A540 is also very busy with dangerous junctions, in particular at Gayton roundabout. I understand that outline planning permission has already been given for the building of 35 homes on a piece of land alongside the road, a short distance away within Cheshire, which will exacerbate the danger.</p>
DOR00449	<p>I am writing to you as a matter of urgency as the proposed building on valuable farm land in the Wirral must surely be one of the most short sighted plans we have seen for some time! Apart from the massive change to the Wirral Peninsula as a semi-rural area, reducing the area available to grow food and support endless generations to come is totally ridiculous and ill thought out. Apparently if the council don't 'Tow the Line' and allow this massacre of farm land to go ahead, Central government will run roughshod over our local planning authority. Surely this is utterly undemocratic? It is totally unacceptable. Where are all the alleged people going to come here from? Where has the NEED for these houses been proven to exist? In my opinion this is a knee jerk reaction from Parliament and totally ill thought out. Where are the jobs and local facilities such as Hospitals, Schools, Doctors surgeries etc. going to be? Can the existing infrastructure cope? I think not as we are already having issues providing these services for people living here already!</p> <p>I am particularly concerned with the following areas:-</p> <p>North of Clatterbridge Road West of Brimstead Lane Storeton, North Of Poulton Hall Road West of Dibinsdale Road West of Raby Drive, Raby Mere Rear of Irby Hall South of Thingwall Road, Irby North of Gills lane, Pensby</p>

DOR REF	RESPONSE
	<p>West of Barnston Village North of Whitehouse lane Land at Chester Road, Gayton</p> <p>the last 6 are really terrible as they will damage the local areas semi-rural look and feel and give the areas concerned a sprawling urban look joining up Irby and Heswall even more than it currently is. My proposal if we are unable to stop this decimation of our beloved peninsula is to stall this as long as possible and hope a change in political scene will occur in order to halt it all together.</p>
DOR00450	<p>I am absolutely disgusted to see the plans of proposed building sites in Wirral. In particular the areas of Storeton, Bebington, Frankby, Irby and Caldy. The reason people choose to live here is for the beautiful open space the Wirral has to offer. Bebington was voted as the most desirable place to live in the UK, one of the main reasons was to do with it being on the edge of a rural area with lots of green open space for families and children to enjoy. Every brown field site has had a supermarket built on it in the last few years with plans approved by the council. Once the green belt land is gone, it's gone forever, along with the wild life and beautiful countryside views that we as a region are trying to promote to attract visitors. As a family that has grown up in Storeton village, am absolutely disgusted this has been proposed again. If 12,000 extra houses were built, this is approximately 48,000 people that require extra jobs, schooling, NHS services etc. How is this physically possible.</p>
DOR00451	<p>I am totally against using green belt land for housing. There is enough brown field sites to use. The housing demand on the Wirral is not as critical as other parts of the country so why use a one size fits all mentality. Destroying what small amount of green belt we have left is wrong. The Wirral has only a small percentage of green belt left compared to the rest of the country. The demand is down south build your houses there. Make peel build on their dock land. Birkenhead Beaufort road area is waiting for Jose's to be built after you lot cleared the last ones. Hands off the Wirral green belt. You got your fire station and blighted the view and quality of life of old Vera le people now you want more of Saughall Massie green belt. you have no shame. You should of fulfilled your obligations for a plan in the past but didn't. Shame.</p>
DOR00452	<p>We have so many unused houses and legitimate Brown Field sites, that there is no need to even think about destroying any of our green belt, at this time. I believe that the present council, who will not be in power for very long, are scare mongering, by threatening to decimate our jewel in the crown of Wirral, by naming Lever Causeway in their first swathe.</p>
DOR00453	<p>It is flood plain and has flooded to a similar extent on several occasions since then. The most notable recent flooding occurred in 2015. Flooding a sudden surge of water away from the field which we learnt was caused by Arrowe Brook breaking its banks downstream leading to the flooding of many properties in the Tern Way area of Moreton. Building on this plot will exacerbate the situation and threaten many more properties in a much wider area. Any properties built on that land will have the same problem and it will make it worse for those of us already in the area. This is low-lying land and from mid-Autumn to mid-Spring, the water table is higher than property foundations. Water under the property also leads to excessive condensation and damp issues associated with that. This land is currently part of a working farm with cows occupying these fields every year. The farm was subject to a refused planning application in 2017 (Ref APP/16/01334) The tenant farmer would be forced to give up this livelihood were the land to be built upon.</p>
DOR00453	<p>This land is home to bats and foxes and is regularly visited by a variety of birdlife including birds of prey, water-fowl and herons; among other wildlife – an owl has been seen there this year. It seems crazy that The Government want the Council to build on Green-Belt sites while brown-field sites are left unused. Two suitable local examples would be the site of the former Foxfield School in Douglas Drive (which I believe is under consideration for housing) and the site of the former Cadbury's factory on Pasture Road which would free up a huge area of land. Building on these brownfield sites would benefit the local community, whereas building on green belt degrades all our communities.</p> <p>[Photographs attached]</p>
DOR00454	<ol style="list-style-type: none"> 1. The land is referred to as "Vacant land" when in fact it has been used continuously for livestock (horses) since at least 2011 when we moved into our house. 2. The entirety of the land is being used for grazing as none of it is cordoned off. 3. Access is being proposed off Broad lane which is currently an unadopted road, who currently owns/has responsibility for this road? My understanding would be that the council would not have the authority to grant access from any point on Broad Lane. 4. The site is adjacent to areas of scientific interest 5. There are significant wildlife assets sounding the proposed development as it is in a rural setting 6. There would be significant development costs primarily due to limited access to the site (only access via hump back bridge over Wirral Way at the bottom of Delavor road. This bridge would need a full structural survey and likely reinforcement / rebuild for the size of the development proposed. 7. Nearest railway station (Heswall) is 3701 meters not 200 meters as reported 8. Nearest town centre (Heswall) is 1609 meters not 800 meters as reported

DOR REF	RESPONSE
	<p>9. Nearest supermarket (Tesco) is 1931 meters not 300 meters as reported</p> <p>10. Nearest Doctor Surgery is (Heswall Medical Centre) is 1770 not 800 meters as reported</p> <p>11. Nearest Dentist is 1448 meters not 800 meters as reported</p> <p>12. Nearest Pharmacy is 1448 meters not 300 meters as reported</p> <p>13. Nearest post office is 1770 meters not 300 meters as reported</p> <p>14. Nearest primary School (St Peters) is 1126 meters not 50 meters as reported</p> <p>15. Nearest Local park is 1448 meters not 50 meters as reported</p> <p>16. Nearest public sports or indoor recreation facility (Heswall squash club) 2735 meters not 50 meters as reported</p>
DOR00455	<p>Submission relates to Lever Causeway Green Belt land.</p> <p>1.) There is sufficient land in urban areas to build upon.</p> <p>2.) The population projection does not warrant for 12,000 houses.</p> <p>3.) It will spoil the character of the area.</p> <p>4.) Lever Causeway and it's open spaces provide an area for relaxation and exercise for innumerable local residents as well as wildlife.</p> <p>5.) Unrivalled views will be destroyed, irreparable damage to its setting.</p> <p>6.) Increased traffic and major congestion.</p> <p>7.) Acres of prime agricultural land will be lost.</p> <p>8.) Damage to Mountwood Conservation area.</p> <p>9.) The sites either side of Lever Causeway are huge. Once released from Green Belt, building could extend to Storeton, causing unrestricted sprawl, with historic Storeton and Bebington Merging.</p> <p>10.) Use the Wirral's already empty 5,000 properties and the already existing space on brownfield sites for 18000 homes.</p>
DOR00456	<p>I strongly object to the plan SHLAA2024 the destruction of a civic centre & public library. There are schools & numerous residents who depend on the facility. Who are the houses you are hoping to build for? The government has no rights to demand councils build houses by taking from us the facilities we the rate payers pay for. I strongly object to the plan SHLAA2025 Allport Lane Car Park. This car park is used every day to capacity. The destruction of this car park will destroy Bromborough Village shopping centre & the shopkeepers business all local citizens paying their taxes rents & utilities. Who are the houses you are hoping to build for? The government has no rights to demand councils build houses by taking from us the facilities we the rate payers pay for.</p>
DOR00457	<p>Please stop projected planning permission to build a vast number of new houses on the Greenbelt on The Wirral, Merseyside. It is totally unacceptable to consider developing on the Wirral greenbelt knowing that there is enough housing through re-occupation of existing houses, Urban regeneration and regeneration of Brownfield sites that have been already identified. Wirral residents will not tolerate local government or the Government's negligence and bullish tactics, bullying behaviour and due to "their personal actions" will result in the loss of our Greenbelt within the Wirral peninsula. This is a peaceful haven. All residents are in agreement they are against building on the Greenbelt. PLEASE ensure we preserve our Green Belt for future generations. The Queen and Prince Philip have been quoted as being always interested in preserving the UK countryside. The government website also quotes the preservation of greenbelt and no merging of communities/towns/villages separated by greenbelt. The Proposed plans contravene the NPPF and will lead to unrestricted Sprawl of large built up areas and merging towns. The local government and the government should be listening to the residents/voters who have signed petitions and want to preserve our Wirral greenbelt for future generations. The Wirral is steeped in history with historic towns, Anglo Saxon battles sites taken place on the fields around Levers causeway plus a Victorian Quarry that supplied local sandstone, are on the Wirral, Levers Causeway Greenbelt. Viking and Roman settlements. The Wirral was also The Royal Forest for the monarchy. We have protected wildlife on these green belts. The Wirral is renowned for all of its natural habitat, greenbelt and historic sites and buildings, bird watching, the Natterjack toads, Greater Crested Newts, Wild Pheasants and amazing selection of Wild Birds.</p> <p>Once the Wirral's Greenbelt is targeted our Green and pleasant land is LOST FOREVER. Use BROWN sites first. It is only the private developer that gains if the Wirral Greenbelt is used for building. Everyone and everything on the Wirral loses. When the residents voted in the Councillors and MPs in government we did so, so you can perform your duty to investigate and exhaust every possibility to develop and regenerate existing communities and brownfield sites and listen to the people. The Wirral is recognised Worldwide for its natural habitat, beauty and quality of life due to the area not being over developed. Present Wirral greenbelt has been greenbelt since Viking times; Anglo Saxon Battles were fought on Wirral's greenbelt; Roman roads are here; The Wirral Peninsular was a The Royal Forest; it is a quiet haven; towns are separated by Greenbelt, the natural beauty can be seen in pictures below; the greenbelt are the lungs of the Wirral. The Greenbelt holds protected species of Wildlife. This present plan will ruin the Wirral Peninsular. For us this proposed building plan will forever ruin the front and rear of Stanley Avenue, Higher Bebington plus lots of other Greenbelt Wirral sites. Please let common sense prevail and utilise existing housing stock, Brownfield Sites, help regenerate the Wirral and help put the right houses in the right places not our Greenbelt. [Photographs of greenbelt attached]</p>

DOR REF	RESPONSE
DOR00458	<p>The proposed Mixed-use site is crossed by a National Grid underground cable. The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. To comply with statutory safety clearances the live electricity conductors of National Grid's overhead power lines are designed to be a minimum height above ground. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result. National Grid prefers that buildings are not built directly beneath its overhead lines. This is for two reasons, the amenity of potential occupiers of properties in the vicinity of lines and because National Grid needs quick and easy access to carry out maintenance of its equipment to ensure that it can be returned to service and be available as part of the national transmission system. Such access can be difficult to obtain without inconveniencing and disturbing occupiers and residents, particularly where properties are in close proximity to overhead lines. National Grid seeks to encourage high quality and well planned development in the vicinity of its high voltage overhead lines. Land beneath and adjacent to the overhead line route should be used to make a positive contribution to the development of the site and can for example be used for nature conservation, open space, landscaping areas or used as a parking court. National Grid, in association with David Lock Associates has produced 'A Sense of Place' guidelines, which look at how to create high quality development near overhead lines and offers practical solutions which can assist in avoiding the unnecessary sterilisation of land in the vicinity of high voltage overhead lines. Potential developers of the sites should be aware that it is National Grid policy to retain our existing overhead lines in-situ. The relocation of existing high voltage overhead lines will only be considered for projects of national importance which has been identified as such by central government. National Grid requests that any High Pressure Major Accident Hazard Pipelines (MAHP) are taken into account when site options are developed in more detail. These pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to retain our existing transmission pipelines in situ. National Grid may have a Deed of Easement for each asset which prevents the erection of permanent/temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally written permission will be required before any works commence within the National Grid easement strip, and a deed of consent is required for any crossing of the easement. In the first instance please consider checking with the Land Registry for the development area.</p>
DOR00459	<p>1 The loss of the car park would be the death of the local shops in Bromborough.</p> <p>2. We lose the only public toilet if the library were to close.</p> <p>3 The loss of the Bromborough hall is used by many different groups. We belong to a dance group which has been going for more than 30 years. My wife and I have been a member of the group for more than 15 years and use the hall two or three times each week. There are so few dance halls in the Wirral suitable for ballroom dancing. It is so important that our generation are able to stay active.</p>
DOR00460	<p>As you are an elected member to Wirral Council, you have taken on the mantle of representing your neighbours and fellow Wirral Residents. The major topic at the moment relates to building a specific number of houses. I would urge you to pursue at great lengths, brownfield land being used and not encroaching on Green Belt. I would also urge you to totally refuse any building applications for Storeton. This Hamlet of Storeton is steeped in history and is mentioned in the Doomsday Book!!! It is regarded as the oldest Community Settlement on the Wirral. It has links to the Vikings. Eminent Historians reckon the Battle of Brunanburh was fought in the area in 937 AD.</p> <p>This Hamlet sees, over the year, hundreds of visitors who walk, cycle, horse ride, dog walk, explore the lanes, footpaths and woods. Once the status quo balance is altered and building permission granted in any of its fields or private land.....then this will be the start of the demise of the Hamlet. History will be lost, never ever to be reclaimed.... THAT IS A SERIOUS RESPONSIBILITY FOR YOU TO CARRY, HAVING THE POWER OF VOTE OVER SUCH A PROPOSAL !!!! It is your family and future generations that will be deprived of their heritage. It will only take one exception....then the flood gates will be open...</p>
DOR00461	<p>As a resident of Bromborough living within 300 yards of Bromborough Village I wish to object most strongly to the proposal to include Bromborough Civic Centre in the Mixed Use Allocation and expose it to the risk of redevelopment. It is much used and locally appreciated amenity. We use the Bromborough Village shops almost daily and visit the library as a source of reference and for books. The computer suite at the library must be such a useful facility for disadvantaged people living locally who can be spared the expense using public transport to other amenities. The Civic Hall seems to be in regular use for charity fund raising bring and buy sales and similar events. It is also used by local ball room dancing school. There is much store set by Central and Local Government generally to encourage local community interests and the possible re-development of the Bromborough Civic Centre would go against that premise. The Council have recently given planning permission for the development of the Acre Lane Site to Morris Homes for the construction of 200 new houses so this is surely this is also a valid reason for the retention of Bromborough Civic Centre as an amenity for those new residents of Bromborough. We wish to object most strongly to the above proposal in the Wirral Local Plan Development Options Review. My wife and I live within 300 yards of Bromborough so do not have need to use the car park often unless it's very wet or we are doing a big shop at the Cooperative Supermarket which we do weekly or if on the way back into Bromborough following a car journey. However what concerns me is what will happen to the shops in the village should the car park be re-developed in any way as I fear a majority will be forced to close if car parking spaces are reduced. There must be over 40 shopping units within Bromborough village so even allowing for some staff members arriving for work on foot or my public transport there must be a consequent demand on car parking spaces. Indeed the staff at the hair dresser salon we use, have to drive into work because of the lack of direct public transport, not to mention the need for car parking spaces for the clientele. In addition we are aware that the Lloyds Bank is the only branch now open on the Wirral from my wife's discussions with other customers generating another need for car parking spaces. In addition the nearest HSBC Branch to Bromborough is in Birkenhead, Heswall or Ellesmere Port. I believe the re-development of the Bromborough car park could provide further reasons for the reduction in local High Street bank availability. On most days the over 75% of car park spaces are used and often no vacant spaces are available on a Friday or Saturday. The Council has recently given planning permission to Morris Homes to build 200 homes on the former Acre Lane Education site thus eventually generating a</p>

DOR REF	RESPONSE
	similar number of car drivers hopefully having need to use Bromborough Village shops on the way home from work .The re- development of the car park and possible reduction of shopping options in Bromborough , could force people to use the Croft Retail Park which could spell the end of Bromborough Village as we know it and create a ghost town . Please consider the effect this would have on the local economy with the loss of retail jobs and deduction in business rate revenues and with draw this proposal from the local plan.
DOR00462	<p>Please see our attached letter of objection to Wirral Council's Local Plan to build on Green Belt, notably in Heswall in the area designated SP071</p> <p>We write to strongly object to the release of Green Belt land in Wirral for new housing. We particularly object to development of the area in Heswall designated SP07 1 on the Forward Planning proposals. Much of this plot, alongside the Chester Road (A540), is used for agriculture and general farming which should be encouraged. We understand that outline planning permission has already been given for the building of 35 homes on a piece of land alongside the A540 in Cheshire.</p> <p>In addition to the adverse impact on the environment of building a new housing development in this area:</p> <p>a) Any new access route via Suncroft Road through the existing residential area would be dangerous. Existing roads in the area are narrow, busy in school time and suffer from a large number of cars accessing Barnston Primary School, safe parking proving difficult to find with some drivers resorting to using the pavement, a practice which we understand Wirral Council seeks to discourage. The intensive use of Sandham Grove and Broadmead is also demonstrated by the constant problem of potholes.</p> <p>b) Many of the existing residents are elderly, necessitating clear access at all times for social services and ambulances which additional traffic would compromise.</p> <p>c) The adjacent main road to the M53, Brimstage Road, having a low bridge over the railway and then a 50mph speed limit for much of its length notwithstanding the many bends in the road including those through Brimstage village, is already busy and hazardous, not least because heavy traffic cannot navigate Barnston Dale. We understand that planning permission has, for those reasons, not been given in the past for developments in Thornton Hough and, further up the road, in Bebington.</p> <p>d) The A540 is also very busy with dangerous junctions, in particular at Gayton roundabout which is already in need of control with traffic lights.</p>
DOR00463	<p>I utterly object to and I am completely against this outrageous plan which will have an immense Environment toll on Wirral's Green Belt east of the M56 due to the following reasons: -</p> <p>The presentation by Wirral council leaders was informative in the various local meetings held but it was delivered as a fait accompli with the leading council leaders seemingly to appear to have made their decision. It also came across from a SPECULATORS and INVESTORS Point of view for LAND OWNERS and DEVELOPERS to BENEFIT from INFLATED land and house prices. Yes, there is a need of AFFORDABLE housing for OUR community of Wirral but we must make sure that all the Brown field sites and existing empty housing units are used first, and of these there is a high percentage towards solving this dilemma. This would eliminate the swaths of green belt land that is outlined in the Council's build plan especially in and around the BEBINGTON and STORETON area. The present state of highways and bye ways in Bebington, Prenton, Bromborough areas are in a state of decay and neglect which 12,500 new properties will only increase further lack of maintenance to these areas. The Council Leaders should have presented a more determined front against this central Government plan to solve this unacceptable process without causing a damaging effect but instead they are taking the easy option of building on Wirral green belt land which may be needed for future agriculture. The Government Formula should be challenge by our so-called Council Leaders in that it is a bad match because of Wirral's unique peninsula situation and being an area of natural beauty should be regarded as a special case as Wirral is somewhat like an Island with sea to three sides and when the green belt is gone it will quickly become a urban sprawl.</p>
DOR00464	<p>I am writing to express my utter contempt for your backward thinking in attempting to build on our precious green belt. SP010A has a significant archaeological sites, including the "hunter gather" site near Greasby Copse (an area of ancient virgin woodland) and the roman road next to "Our Lady of Pity" Primary school. The area is home to some of the very few Barn Owls left on Wirral and also to the declining Tawny Owl. This valuable part of our heritage is currently home to a significant Dairy Farm, which is likely to become more important with the fallout from Brexit and our increasing population. It would be short sighted to destroy this business. The land provides a valuable wild life corridor over to Harrock Woods and the fields separating Pensby and Irby.</p> <p>It disgusts me that this Council wants to raid the small amount of Green Belt that we have left, killing all the wildlife and trees in the process and turn Wirral into a vast sprawling conurbation. It is further galling that there are so many brown field sites that should be developed first. If you were really a "Forward Planner" this would be the last thing you would consider doing to what is left of the green spaces in Wirral. Instead you would be thinking more radically i.e. we have 2 large obsolete shopping areas namely Birkenhead and Liscard. They are dying because of Internet shopping and the process is being hastened by car parking charges. Knock them both down and think about utilising that land for housing first.</p>
DOR00465	<p>I feel very strongly that the local council are to release Green Belt on the fields either side of Lever Causeway and from Mount Road towards Storeton. This is devastating for the residents in and around the area and would like to following points to be noted.</p> <ul style="list-style-type: none"> • 12,000 houses are not needed - the population project does not warrant this figure • Lever Causeway and its open spaces provide an area for relaxation and exercise for innumerable local residents. • Mount Road's elevated position currently provides unrivalled views which would be totally destroyed. Any building would cause substantial detrimental visual impact on the remaining Green Belt. • Storeton is an historic hamlet which will be directly affected by any building on Lever Causeway. This will cause irreparable damage to its setting. • Increased traffic and major congestion. • Acres of prime agricultural land will be lost. • The proposed destruction of Green Belt will have a damaging effect on Mountwood Conservation Area as it will destroy its setting

DOR REF	RESPONSE
	<ul style="list-style-type: none"> • There is sufficient land in urban areas to build upon.
DOR00466	<p>I am extremely concerned by the proposal to build 534 houses on Greasby Copse. The farm has been there for over 50 years and has been passed down for generations. There are tons of animals and wildlife that live on the land including bats in our garden which are protected species, foxes, pheasants, birds, not to mention all the cows. The farm supply milk around the Wirral to shops, cafes, restaurants and they sell to the general public. They are the only licensed seller in Merseyside to sell unpasteurised milk. Why are the council planning on taking away local food sources? Aren't we supposed to be encouraging farmers especially with Brexit? If houses were to be built behind Rigby Drive that they would flood. They have flooded in the past. All the farmers grass land prevents flooding and with the increase in rain we are now getting, building houses behind is a huge concern. The Green Belts fresh air and open spaces make it fundamental to our physical health and mental wellbeing. The council have already taken away Country Parks and beaches away from us by making them payable to park and now they are going to take away our fresh air. There is space for 18,000 houses on Brownfield sites on the Wirral so why have the council chosen green belt? The only possible reason is so the council can make money. When protected countryside is released to developers, it's not low cost housing they build, but executive homes for the most wealthy. 84% of homes built on Green Belt in recent years have been for the middle or top end of a market that is already unaffordable for most people unless they already have access to existing housing wealth. Misguided calls to build on Green Belt result in millions of people losing valuable access to countryside without doing anything to tackle the housing shortage.</p> <p>The areas where you are suggesting to build will not be affordable housing so a total waste of time. We have thousands of empty properties on the Wirral. We do not need more houses being built of this kind. Why don't you try to regenerate Birkenhead? You should be building houses in Birkenhead, Liscard and Wallasey Docklands in an attempt to bring these areas to a higher standard of living. Further development of green belt land will add to congestion on already congested side roads and country lanes. You will be taking away our bridleways we have worked so hard to keep and maintain. you are planning over 2000 houses from Rigby Drive up to Limbo Lane in Irby. Most houses have 3-4 occupants so where are potentially 8000 people going to go to the doctors, hospital, school etc... You do not have the infrastructure to build 534 houses on Greasby copse. It is absurd. I also have no idea where all these people are going to come from to live and buy these houses. The traffic on Arrowe Road and Greasby Road is already bad at peak times but if you add another 1000 cars on from Greasby copse alone you will need to build more roads to get out of Greasby. The schools in Greasby are full so where do you envisage the kids will go to school? I have waited almost a week for a doctor appointment for my baby this week so I dread to think where all these thousands of people will go.</p>
DOR00467	<p>The site (SP061) at North of Gills Lane, Pensby is important green space that accords with the principles of the Green Belt, whilst also providing quality visual amenity and landscape character to Barnston Road, Gills Lane and the properties on Gwendoline Close, Thorncroft Drive, Daleview Close and Barnsdale Ave. The site is described in the consultation document as a 'large area of high quality agricultural land'; bounded by the A551, it, along with the area of land to the north east of the site and to the south and east of the Bassett Hound Pub, forms a key green gap between Barnston village, and Thingwall and Pensby. Over a number of decades, Thingwall and Pensby have coalesced, with Thingwall, a significant Viking settlement, having been swallowed up by Pensby, itself becoming effectively an extension to Heswall. As stated in the Initial Green Belt Review document and the revised National Planning Policy Framework (NPPF), three of the purposes listed reference urban sprawl and merging of towns into one another, which in turn encroach in the countryside and whilst it refers to 'towns' in the description of these, the principles of also should apply to existing villages that will become swallowed up by expanding settlements, losing their individual character.</p> <p>Green Belt Purpose 5 is stated in the document to be 'To assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. A brief look at the council's website shows the publication of the statutory register of brownfield land, as per the Town & Country Planning (Brownfield Land Register) Regulations 2017; however the responsibility appears to have been handed off to the Planning Committee for annual review. This seems like a disingenuous assessment of the credible sites that would be available as a partial alternative to removing or reducing the Green Belt designation; allocated resources and/or the level of detail, willingly provided to the general public, doesn't seem comparable to the seeming readiness to strip the areas of one of UK planning policy's most sacrosanct designations. The link provided in the letter that was sent to the surrounding properties drew attention specifically to the Green Belt review, but it is unfair to not provide clear details of reasonable alternatives to allow the public to make informed comments. The para 136 of the NPPF states that 'Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified', but the justification should be on the basis that there are no alternative sites.</p> <p>I strongly object to this or any green belt site being used for housing development especially when the use of all brownfield sites has not been fully explored.</p>
DOR00468	<p>Livers Causeway is our link to the countryside, it provides peace and relaxation from a busy world. I have spent many evenings and weekends walking down Lever Causeway with the family and dog to clear my mind and relax. My favourite being our Christmas Day walk that we do every year down Lever Causeway. In an era of deteriorating mental health, it is amazing what a walk in the countryside can do for you, please don't take this away from us. Many people chose to live in this area because of its beauty and proximity to the beautiful countryside. Please don't destroy it. There are so many run down houses and unused houses around the Wirral, why can't you just regenerate these instead? It will improve the area and provide the housing needed. Why do you have to use our green belt? Building houses there will ruin the countryside, will ruin the character of where we live, will ruin the peace and quiet and will ruin the beautiful scenery. The traffic and congestion that it will cause will be awful, more disruption to the peace and quiet. Just think about what you are doing and consider using urban land or regenerating run down residential areas before destroying a place of natural beauty that has been loved by residents for as long as I can remember.</p>

DOR REF	RESPONSE
DOR00469	<p>I would like to register my views about Wirral's local plan. I do appreciate the Council's position in having to find land for 12,000 homes. However, I think that the wholesale destruction of Wirral's valuable greenbelt is totally the wrong way of going about this. Once our greenbelt is destroyed it can never be restored and one of the attractions of living on the Wirral is its countryside. Here is my feedback and suggestions:</p> <ul style="list-style-type: none"> • If Peel Holdings won't redevelop the waste ground of Birkenhead docks, then why not compulsory purchase it and sell onto another developer who will develop that land? That land is one of Wirral's greatest assets with wonderful views over the Mersey but it is not being used. • Looking around, there seems to be quite a lot of derelict property in Birkenhead that could be either refurbished into flats or demolished to make way for new-build flats. Such as Central Hotel and other such places that have been empty long-term. There seems to be a lot of derelict industrial sites. • According to articles, about 25% of people live alone now, so rather than build houses with gardens which use a lot of land, why not concentrate on more suitable property for single people? Why not build more lower high-rises? Not huge 1960s tower blocks like Grenfell Tower but blocks about 5 or 6 storeys high? That would mean less land would need to be used to provide 12,000 homes. I did respond to the Council's feedback form but doubt if my views will be heard, however, as you are the Cabinet Member for the environment as well as one of my local councillors, I thought I would drop you a line as well as you might be better placed to represent my views.
DOR00470	<p>It appears that the proposed withdrawal of Green Belt areas should be unnecessary. Peel Holdings have offered to meet Government requirements for housing, using 'Brownfield' areas. I read that 'The Council' has refused to consider a list of possible 'Brownfield' sites which have been suggested for development. The people who live in the areas which will be affected by the Plan are surely best placed to decide where houses should be built, depending on their needs and income. Paying outside consultants is unnecessary and a waste of money. In addition, in Wirral there are areas where development is badly needed, which would use less land and provide much needed homes, for example, in parts of Wallasey and Birkenhead. The irrevocable, damaging loss of Green Belt in the Wirral is to be avoided. The Plan is not addressing nor caring for the needs of the community as it is now, nor as it will be in the future. It is not fit to be submitted on our behalf.</p>
DOR00471	<p>It is almost impossible to actually access the areas which I feel are relevant to me it is all so complex that after an hour of going from one menu to another I have given up. I cannot make up my mind if this is a deliberate act on your part, to make it impossible to understand, or if you in the council planning actually understand it. Surely it is possible to have a site which can be accessed showing the different areas at the press of a button so that it can be understood by everyone.</p>
DOR00472	<p>I wish to object most strongly to your plans for Bromborough. Schools, surgeries, dentists are full as it is. Where will we be able to park? The shops will be hammered! Sort new ferry out first!</p>
DOR00473	<p>I wish to protest at the idea of development at the Lever Causeway site. This extension of the urban sprawl will make the concept of a Green Belt a waste of time. I feel that much more consideration is needed to redevelopment within the present urban areas.</p>
DOR00474	<p>I write to you to express my opinion that the planned development shouldn't go ahead as that will negatively impact the area. Surely there are areas of 'dead' land that could be used instead or there seems to be many unused and empty properties that could be utilised first. My childhood has benefitted from the open space and nice views around that area and I hate to think my grandchildren won't benefit from the same.</p>
DOR00475	<p>Being a local resident for over 50 years, I have to raise my objections to the proposed release of the local green belt land for building. The building of 12,000 houses locally is not needed as the population projection does not warrant this figure. I believe that the increase in traffic would be detrimental to the local area and add major congestion to an already busy road system. The local schools some of which are already oversubscribed could not be expected to accept more children. We would therefore need new schools to accommodate the extra children. The local hospital is also under stress not only during the winter months but throughout the year. An increase in local population would only add to the already stretched facilities and waiting lists. Local residents are struggling to find GPs and dentists without having more people to compete with. Some local residents have had the purchase of their houses affected due to the level of pollution without extra vehicle fumes. I feel that there is sufficient land in urban areas to build upon before using land such as in Lever Causeway which provides open spaces which provides an area for walking and relaxation. It would also have a detrimental effect on the wildlife and would spoil the unrivalled views. We would also lose acres of prime agricultural land.</p>
DOR00476	<p>We feel so angry that whilst there are locally other potential redevelopment areas (obviously less desirable from a commercial gain point of view) the desecration of such a valuable local 'commodity' can even be considered!! We agree most strongly with all 10 points made in the recent circular entitled 'Green Belt Gobbling'. It's a disgrace that protection of the green belt environment is so low on the political/central governmental agenda - whilst the majority of those who have political or other influence will of course be among those who can pick & choose where they live, and many will often have the luxury of more than one residence!! Please keep working hard to prevent this erosion of such a necessary & healthy part of our environment.</p>

DOR REF	RESPONSE
DOR00477	<p>On Wirral, not far away are houses on Borough Road near Birkenhead Library which were demolished and the land not built on again; prime locations for affordable housing with ease of access to schools, shops and infrastructure. Many other such areas exist e.g. near the Corporation Road area where houses have also been demolished and not rebuilt. I believe proposed building plans in this area are not due to commence for a few years; I understand PEEL [not a local community company have purchased much of this land]. This is not ethical as this land is more suitable for affordable housing near communities where families are supported by the community, their families and accessible to schools and services of their chosen community. Housing built in CH63 will not be affordable to these displaced families; the infrastructure including transport and schools does not support the building on this Green Belt land. This is unethical on many levels; I for one will fight strong opposition to this proposal.</p>
DOR00478	<p>I am contacting you to vehemently oppose Wirral Borough Council's 'Local Plan' proposal to build over 12,000 new homes (over a 15 year period) the majority of which would be built on released Green Belt Land throughout Wirral but significant majority within the South Wirral area. This is in response to Central Government's national house building targets. Firstly I would challenge the fact that Central Government Ministry of Housing deem it necessary to build such large numbers of housing on the Wirral peninsula. This does not reflect the demographics of Wirral residents nor the historical and future patterns of population growth. Using the Governments own official statistics (www.ons.gov.uk) Wirral's population is less today than in 1981 and the proposed population growth is only an additional 10,898 people by 2036 !!! This increased figure (population total 332,136) will still not exceed the historical population figure in 1981 (pop total 338,954)...SO WHY do we need to build 12,000 ++ houses ???????</p> <p>(The Secretary of State for Housing) how can you justify demanding this housing target ???? Have you or your colleagues in Whitehall ever taken the time to visit the Wirral Peninsula to see for yourself ?? Wirral is a unique peninsula which has approx. 46% green belt land and is surrounded by coastline and has open green areas. Our Greenbelt includes woodlands and nature reserves, areas of natural beauty, agricultural land and areas of historical significance. All of which have been identified as part of Wirral's proposed Local Plan to release for housing development.</p> <p>Wirral Councils proposed Local Plan to release Greenbelt Land for development will increase the sprawl of large built up areas especially within South Wirral area; creating neighbouring towns merging towards one another. This proposal is a gross encroachment on the countryside. It will detrimentally effect Wirral's historical setting and its special character. By not ensuring urban regeneration of derelict Brownfield land such as 'Wirral Waters' the council are failing to ensure the protection of precious Greenbelt Land on the Wirral Peninsula. THIS IS AN OUTRAGE !!! Furthermore; This is a ludicrous situation that Wirral councillors are saying that there is no option but to use precious Green Belt land within their Local Plan because there is not enough Brownfield sites to meet this housing demand when there are developers such as Peel Enterprises who bought brownfield site - Wirral Waters from Wirral Council approximately 10 years ago with full glossy presentations and proposals to build 12,000 houses and business and community projects, with full support from Wirral Borough Council (who 2 years ago extended their planning permission at no extra cost to facilitate this development).....To-date to their SHAME Peel have not built a single house !!!.</p> <p>This is despite their acknowledgement about the importance of Wirral Waters development in providing the majority this Governments housing target ... they to-date only plan to build approximately 2,400 homes over next 15 years.</p> <p>How can this be ?? When in 2017 Wirral Waters was designated a Housing Zone by Central Government making it the ONLY project in UK to benefit from Housing Zone and Enterprise Zone status,.. thus demonstrating the priority status Central Government was giving to this project.</p> <p>Again (Secretary of State for Housing) and Wirral Council Why are you not enforcing Peel Enterprises to commit to and build these 12,000 houses as they proposed to do ?????????? Any finances available from local AND central Government should be aimed towards facilitating the Wirral Waters Development (12,000 houses) and should form the central part of Wirral Council Local Plan !!!!! Not only would it satisfy your need for your housing targets but utilising this development - as it should be !!! would have the least amount of decimating and detrimental impact on the Wirral peninsula Green Belt areas and therefore Wirral residents alike as the Green Belt would remain mainly untouched. To build the proposed number of new homes within Wirral peninsula is going to require major multi million pound investment in local infrastructure and services (Roads, access, main services, increased size motorway, public transport, new schools, GP's and shops and business) Where does Central Government expect this funding to come from ??? Furthermore What detrimental impact would this have on the environment for all Wirral residents ??</p> <p>PLEASE PLEASE GOVERNMENT MINISTERS, WIRRAL COUNCILLORS and PEEL HOLDINGS see common sense and work collaboratively together to satisfy all parties interests in providing a sensible housing development plan for a reasonable amount of houses in the right part of the Wirral Peninsula, without decimating Wirral's precious Greenbelt Land that should be preserved for current Wirral residents and future generations to come.</p> <p>ACT NOW BEFORE ITS TOO LATE.</p>
DOR00479	<p>Lever causeway is the gateway to open countryside, used by so many people to walk, jog, cycle and so much more. Old and young, dog walkers, families with small children on bikes, elderly hand in hand a magnet and a destination that is part of the landscape and valued by so many people. The potential plans to build here is so short sighted and seems like an act of destruction that is beyond the understanding of so many people that it could even be considered, when so many more areas are suitable. I feel very strongly that it would be the wrong decision to release the green belt land and a bad decision that will remain on the conscience of Wirral Council and shame it, for many years to follow.</p>

DOR REF	RESPONSE
DOR00480	<p>Following recent consultation at Hulme Hall I would like to point out some reasons for my objection to the proposed plans to build on Greenbelt Land in Bebington:</p> <ol style="list-style-type: none"> 1. There is sufficient land in urban areas to build upon. Peel Holdings aside - this land should be prioritised first. 2. Wirral and Central Government statistics show a decreasing population in Wirral. Not an increase. So why 12,000 new homes? 3. Lever Causeway and surrounding Green Belt areas are huge sites! This will strip away valuable open space that the current population of the East side of Wirral want and need. 4. There will be an overarching destructive effect on taking away the current Green Belt land. Historic sites, Conservation Areas and prime Agricultural land will be lost forever. 5. We are a small, squeezed peninsula surrounded on three sides by water and our open spaces are precious. Already, there are concerns about increased traffic and associated pollution. The proposed building in and around the Lever Causeway & Storeton areas will not reduce this - only increase. <p>Please put this submission with the many others I suspect will have been received in objection to this proposed, destructive plan. There is an error in your Summary of Initial Green Belt Assessment September 2018. On page 52 the agricultural land use for SP030 has been classed as pasture and horse grazing. In fact, the land under SHLAA1819 on site SP030 is actually used for farming arable, and has been for many, many years. Recent soil reports show the site as containing very good quality soil. SHLAA1819 has already had a crop harvested this year and is currently growing winter wheat. The land further down Lever Causeway between Marsh Hey Covert and Little Storeton Village is also being farmed. Therefore a very large proportion of SP030 is actually used for arable farming and not horse grazing as indicated. At a Council Meeting on 15 October, Motion 3 was voted on and carried unanimously. The first paragraph of this motion reads, [Motion 3, P.1 referenced]</p> <p>I have attached a photo of the field in question. It was taken on 17/6/2017. As you can see, it's full of wheat. I've also attached a screen shot of page 52 of the Summary of Initial Green Belt Assessment.</p> <p>Also, as this parcel of land abuts Marsh Hey Covert, and covers an area between Marsh Hey Covert and a copse behind Stanley Avenue, the notes should also include that the area may include supporting habitat, as there is evidence of badger activity, owls and bats in this area. The areas also give protection to other local wildlife whose natural habitat will be eroded by any development</p>
DOR00481	I wish to submit my objection to your plans for Bromborough village. There will be nowhere to park and shops will suffer. Also, schools, surgeries and dentists are full to bursting. Concentrate on sorting out new ferry. Those residents have suffered long enough.
DOR00482	Storeton is an historic hamlet which will be directly affected by any building on lever causeway. This will cause irreparable damage to its setting. Increased traffic and major congestion. Acres of prime agricultural land will be lost. The proposed destruction of green Belt will have a damaging effect on Mountwood Conservation Areas as it will destroy its settings.
DOR00483	<p>Having attended the presentation at west Kirby, I feel I must make the following comments. May I first state that the presentation by the Assistant Director was excellent and his replies to questions very detailed. Before my retirement I served on the Wirral Waters committee as representative of Land Registry, I was dismayed to hear that we don't seem to be any further on with this MAJOR development. The blame seemed to be being put at Peel Holdings door, but this was rejected by them in their most recent letter. My main interest now I have returned to Wirral is the old School site as this is in close proximity to my new property on Neva Avenue. There used to be an entrance to this site via Roy Avenue, but the council in their wisdom (many years ago) built over it. Our main worries at the moment are:-</p> <ol style="list-style-type: none"> 1) Lack of information as to what development might take place. 2) Being told at the consultation meeting, that only people with a boundary bordering the site would be included in any consultation. 3) The main access to and from this proposed site would severely increase the traffic on Neva Avenue and Douglas Drive. <p>No consideration to this was mentioned in the meeting.</p>
DOR00484	<p>I am an 11 year old girl from the Wirral writing to you to give you my thoughts on your plan to build on our Green Belt. Firstly, I understand that you would like to build homes to help other people, and I support this decision. However, Claremont Farm is my favourite part of Spital because of its gorgeous views and delicious home grown vegetables. I have loved this farm for all of my life : three years ago, I wrote about how Claremont was my favourite place to be, and it would be distressing to know that this magnificent place could be used for housing in the future. Dedicated farmers have worked since 1906 to complete the sensational farm, and it really makes me feel upset that you are being so inconsiderate to build on this breathtakingly beautiful piece of land. There are many other fields to build on - so why choose ours?</p> <p>If you would please consider my point of view, it would be much appreciated. Thank you for your time. Attached below are some pictures of Claremont Farm. [Photograph attached]</p>
DOR00485	<p>Our reasons to strongly object about the above building proposals in your reference. This is truly Green belt with hundreds of mature trees and it is efficiently farmed. We will need land like this when we leave the EU The only small areas not farmed are owned by land speculators. The A540 is already a busy and dangerous road, as the signs you have erected point out. One of them in fact directly opposite one of the fields in your proposals for building. Over 70 accidents and many deaths have occurred where the road bends very dangerously. To put access on to this part of the road and increase these dangers, should surely be objected to by the Highways commission? The wild life also plays a very important part of these areas and is occupied by many thousands of birds, which are in fact being monitored not only by wild life enthusiasts but by the RSPB themselves. Recent surveys on the pond life commissioned by a building company are flawed and they have not inspected ALL of the pond in fact they don't seem to even be aware of where some of the pond on The Wirral in fact are. Common sense should prevail as you cannot build low cost housing on</p>

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	expensive land.
DOR00486	I believe that releasing Green Belt land for development is both pointless and worrying when there are adequate brownfield sites (with access roads, facilities and services in close proximity) waiting to be used for housing and apartments
DOR00487	I strongly object to the use of Green Belt land for housing in the Bebington area.
DOR00488	<p>Myself and my young family live in Bebington and I am writing to oppose any development on our beautiful greenbelt sites.</p> <p>My reasons for objection are:</p> <ul style="list-style-type: none"> - there is sufficient land in urban areas - 12000 houses are not needed. Develop and invest in areas that need support such as New Ferry and Birkenhead. - the greens pace is used by walkers, kids playing and building will lead to increased traffic and congestion as well as further pressure on community resources, schools and our healthcare system. - agricultural land will be lost and this land will be destroyed forever. <p>I strongly oppose building on any areas of greenbelt in particular Bebington, Store ton and Levers Causeway areas. Do not do this to us and our kids futures. We love Wirral and our Countryside</p>
DOR00489	Housing development on Green Belt has to be the last resort. Green Belt land provides areas for wild life and fauna to flourish whilst preventing urban sprawl. I understand that there is a need for additional, affordable housing on the Wirral but a housing target of 12000 over the next 15 years beggars' belief. Should that many houses be built who would fund the infrastructure in the form of roads, doctors, hospitals etc. to accommodate the increase in population. Where would these people find employment ? Wirral hasn't got a particularly good C.V when it comes jobs. Squibb, Cadburys and Champion Spark Plug spring to mind. I believe that the government proposed housing figures should be challenged by the council and a more realistic target be agreed. One that could be catered for by already approved planning projects and development of Brown Field sites. Remember, once the Green Belt has gone, it's gone. Do you want that to be your legacy ?
DOR00490	I wish to formally advise you of my opposition for releasing Greenbelt land for building on the fields either side of Lever causeway and from Mount Road towards Storeton. The proposed development would destroy the Lever causeway environment and its open spaces which I utilise on a daily basis. One of the reasons for setting up home in Higher Bebington on the Wirral over 30 years a forgo was the beautiful locality and views over to North Wales. This would be destroyed by the building of homes that according to the population projection are not required in such numbers.
DOR00491	I would like to register my objection to the proposed construction of 30 homes on the field on Grange Road West Kirby. West Kirby in recent years has seen many new residential properties built with the result that traffic and parking in West Kirby is a nightmare. Every new residence leads to further pressure on the already stressed infrastructure. I live on Carpenters lane where parking for users of Ashton Park and St Bridget's school causes real problems for residents at the weekend and school opening and closings times , a serious accident is inevitable.
DOR00492	I write with reference to the proposed release of green belt land off Lever Causeway in Bebington. I would like to challenge the process of the Local Plan as I do not feel that there is any need to release any Green Belt due to the new Office for National Statistics figures and the brownfield sites available on the Wirral.
DOR00493	<p>I would like to officially register my concerns and objection to the proposed housing stock developments in the Bebington area and specifically Levers causeway and Storeton village area and planned utilisation of green belt areas in the Bebington area. Having been a resident of this area for over 30 years and embedded with family friends and neighbours we all share a common goal/need to protect our environment /green belt for now and future generations and have serious concerns in the manner that local authority/central government are planning to impose developments major changes to this and other areas on the Wirral .The approach seems random ill-founded and will marginalize many areas by dramatically changing the demographic capability of proposed areas .</p> <ul style="list-style-type: none"> • The whole ethos behind green belt is been ignored and in my view based on the profit from property developers and not meeting the true needs at lower end /entry point for people wanting to own/rent suitable sized accommodation for their needs and financial limitations • there is already land in urban areas available for development and indeed look at vacant property options properly. • If plans /development go ahead then I sincerely believe people will look to move out of the area as the appeal /original premise for wanting to live here will be for ever lost .House values will also potentially go down so many may move out before that occurs? • The plans would result in extended urban sprawl and the additional environmental impact would be large IE increased traffic/congestion/pollution /accident rates will go up, increased local authority costs in managing services, street lighting /roads etc. who meets these costs at a time when WBC cannot provide basic services elsewhere this is a financial/budgetary burden in the making !!local bus services are in the hands of private companies no profit no service • Agricultural and animal/habitat impact , loss of farming and natural environment /wildlife impact , will the badgers /foxes/birds all require new houses NO ! but they need trees open fields rural areas to live and thrive.

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	<ul style="list-style-type: none"> • Bebington voted as one of best places to live in UK in past years i suspect this will no longer be the case • The views over to welsh hills and Wirral area are splendid as mount road Storeton woods is on an escarpment it is not just local people who visit enjoy and walk/run/cycle around this area of beauty • the Mountwood Conservation Area will be lost and become a faceless area full of cars /delivery vans and the increased demand on road transport /schools /local amenities will cause other issues • the developers will not provide a range of proper affordable housing for entry point people it will be geared to bigger properties that make more money and sell quickly • cycle path and walking area of levers causeway will be lost the impact on Storeton village/farming communities and livelihoods will be awful and i believe never reversed once started • Local rural roads connecting to Storeton /Heswall/Brimstage/Clatterbridge will not deal with increased traffic demands and mount road is also a congestion point for people commuting using j4 of m56 at Clatterbridge . <p>I sincerely hope residents/local opinion and FACTS will result in a review of such proposals and adopt and future protection of current environment</p>
DOR00494	<p>I hope I am not too late to add my voice to the consultation about the local plan and the green belt review. I do not support the development of any green belt land for housing (although I was in the small minority of those in favour of the fire station in Saughall Massie). Having been to some of the meetings and read about it, it seems that the needs of Wirral residents over the next 15 years can be adequately met by the Peel Group's plans for Wirral Waters plus development of brownfield sites and renovation of empty properties. Driving around the Wirral, there are many houses and flats built in the last 15 years. We are a densely populated peninsula and we need our open spaces between villages and towns. I do hope that you and all the councillors will support and enable the Peel Group development, the building of affordable homes on brownfield sites and protect Wirral's green spaces.</p>
DOR00495	<p>I am writing as a lifetime Wirral resident who is very concerned about the future of the Greenbelt. This area is special because of its countryside and I feel very strongly that it must be preserved. I understand that you are to provide a local plan for the provision of approximately 477 homes per year for the next 15 years. I wish to register my strong objection to the use of any greenbelt land for this purpose when there are more than sufficient alternatives available. There are numerous brownfield sites: Peel Holdings alone have committed to building 13,500 homes of disused former industrial sites. In addition there are nearly 5,000 unoccupied dwellings which need refurbishment and 1,500 approved planning applications which have not been built. The law dictates that these sites must be used preferentially and consequently it is not necessary to touch our countryside. I am also very shocked at the plans for the development of a golf resort in Hoylake. This would require the sacrifice of 295 acres of agricultural and ecologically important wetland with the loss of wildlife, crops and open spaces for local people. The construction of 188 luxury houses is in direct defiance of greenbelt legislation. We greatly appreciate the relative obscurity of the Wirral and do not want it to become a 'globally significant' golf destination.</p> <p>Rather than putting large amounts of public resources into such unpopular schemes, Wirral Borough Council could achieve far greater support by backing projects which would really improve the Wirral. Peel Holdings' plans for the rejuvenation of the docks would provide a great variety of residential, commercial, educational and leisure facilities. It would bring investment from multiple sources and could transform this largely derelict area into a truly desirable place. Birkenhead and the surrounding districts are also in desperate need of restoration. The £16.6m of public money which you plan to spend on an access road to the private golf development should be allocated to homes and to making the town centre an attractive place for business. The Council was elected to serve the interests of the people and environment of the Wirral. It is not free to act outside the law or to promote its own interests. You must be open in the plans that you make and listen to the voices of the people. Specifically at this time, we expect you to ensure that all decisions are made with a view to protecting our green spaces for the future.</p>
DOR00496	<p>I am writing to object to Wirral Council's plans to release Green Belt for building on the fields on either side of Lever Causeway. Here are my reasons for my objection:</p> <ul style="list-style-type: none"> . There is sufficient land in urban areas to build upon . 12,000 houses are not needed - the population projection does not warrant this figure . Will fundamentally change the character of the area . The sites either side of Lever Causeway are huge. Once released from Green Belt, building could extend to Storeton, causing unrestricted sprawl, with historic Storeton and Bebington merging. . Lever Causeway and its open spaces provide an area for relaxation and exercise for innumerable local resident's. . Mount Road's elevated position currently provides unrivalled views which would be totally destroyed. Any building would cause substantial detrimental visual impact on the remaining Green Belt. . Storeton is an historic hamlet which will be directly affected by any building on Lever Causeway. This will cause irreparable damage-to its setting. . increased traffic and major congestion . Acres of prime agricultural land will be lost . The proposed destruction of Green Belt will have a damaging effect on Mountwood Conservation Area as it will destroy its setting.
DOR00497	<p>Please stop this development! It's essential for the wellbeing of the "Mersey side" of the Wirral peninsula and its residents and businesses that these small areas of green belt are preserved. I understand the need for housing but given there is enough "brown belt" land on the Wirral for at least another 4000 houses, no green belt should not be considered until it is fully developed. Some of the advantages of developing "brown belt" land would be that the houses would be cheaper than those built on green belt and the overall attractiveness of the Wirral for existing and future</p>

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	residents and businesses would be enhanced.
DOR00498	<p>I'm writing to object against Wirral Council's plans to release Green Belt for building on the fields either side of Lever Causeway and from Mount Road towards Storeton. Reasons for objecting;</p> <ul style="list-style-type: none"> • I will be directly affected, mainly by the traffic congestion which will be inevitable. • There is sufficient land in urban areas to build upon • there is an abundance of brownfield sites and at least 5000 empty properties on the Wirral which could be utilised first • 12,000 house are not needed, the population projection does not warrant this figure • it will fundamentally change the character of the area • the sites either side of Lever Causeway are huge, once released from Green Belt, building could extend to Storeton, causing unrestricted sprawl, with historic Storeton and Bebington merging. • Lever Causeway and it's open spaces provide an area for relation and exercise for enumerable local residents. • Mount Roads elevated position currently provides unrivalled views which would be totally destroyed. any building would cause substantial detrimental visual impact on the remaining Green Belt. • Storeton is an historic hamlet which will be directly affected by any building on Lever Causeway. This will cause irreparable damage to its setting. • increased traffic and major congestion • Acres of prime agricultural land will be lost • The proposed destruction of Green Belt will have damaging effect on Mountwood Conservation Area as it will destroy its setting. <p>Thank you for taking the time to read. Don't ruin our Green Land, surely there's another way!!</p>
DOR00499	<p>I am writing to put across my opinion that you must stop the plans to build on Wirral's precious Green Belt land for the sake of our wildlife and resources.</p> <p>There are a few beautiful areas left where there are still endangered species such as hedgehogs and badgers living as they always have, please don't do this.</p> <p>I am devastated that anyone would consider building on Green Belt, surely that was the purpose of it, to be protected always, for everyone's benefit.</p> <p>We have so much derelict land and so many empty properties please consider how these could be used. If you allow this land to be built on, on your watch, it can never go back.</p> <p>Never. For our children and future generations, please preserve the beauty of the country side. This is just greed and wanton waste.</p> <p>I despair for the roads, hospitals and schools which are stretched to their limits.</p>
DOR00500	<p>Further to my following email, please add my wife as a second person raising concerns and objections to the proposed scheme, we have found out that there are approximately 5000 empty properties on Wirral. It seems to us that these should be put into use first before any building work starts and certainly before the use of any green belt land is even considered. Between that number of properties and Peel Holdings commitment, this should provide more than enough new housing on Wirral. I am writing to you as a Wirral resident to register my concern and objection to the proposed house building work on green belt land. The first issue I have is based on perceived 'need' for that many houses on this relatively over-crowded peninsula. As you will know, there are currently around 320,000 people living in Wirral and this overall figure has been broadly stable for many years. The data I have seen shows a slight yearly reduction and then the census seems to bring it back to around the same figure. The proposal to build 12,000 houses is too much to satisfy any local need in relation to homelessness - important as that is - and therefore must be based on a significant growth in population (say, approximately 36,000 based on an average of around 3 people per household - more than 11%). The projection figure that I have seen over the next 20 years is only 1.7% and that probably doesn't reflect the issue of leaving the EU which is only likely to reduce the rate of growth in the UK / Wirral. I would like to ask you to let me know what evidence there is that such an increased need for housing will arise over the next 15 years. If there is such population growth, how is this going to affect - jobs / unemployment - infrastructure It is all very well building so many houses but what is the certainty of creating new jobs and what is the plan for developing schools, medical services, transport etc. to support this?</p> <p>Peel Holding's commitment - I refer to a letter quoted in Wirral Globe of 15th August 2018 - to developing the Wirral Water's site is sensible and realistic. it commits to development on brown field sites only and in terms of house numbers, their plan is based on practicalities not a fixed, relatively arbitrary number. No doubt the size and type of housing will also reflect the needs within Wirral. The overall regeneration and contribution - not just for housing - to Wirral from this project seems immense. Turning to the issue of building on greenbelt land, it goes without saying that once it has gone, it has gone. Some of the sites identified are important historical landmarks, fields and woods which have been part of the Wirral community for decades, or serve to separate towns and villages which have their own identity and personality. So let me make my position clear, I strongly object to any green belt land being built on when sensible alternatives actually exist. Having said that, the green belt areas designated as potential build land are not evenly spread across Wirral and the side east of the M53 is disproportionately impacted. Why is this? It is even more important when considering the above infrastructure point. Central government needs to be challenged but local government needs to demonstrate that it has realistic proposals which deliver the housing needs of the community and which are supported by that community. I doubt that there is much support for destroying such beautiful parts of our peninsula. As well as noting my objections, I look forward to receiving your response to the issues I raise - thank you. Further to our previous communication (as follows), we are writing to advise that we have noticed an error in your Summary of Initial Green Belt Assessment September 2018. On page 52 the agricultural land use for SP030 has been classed as pasture and horse grazing. In fact, the land under SHLAA1819 on site SP030 is actually used for farming arable, and has been for many, many years. We understand that recent soil reports show the site as containing very good quality soil. SHLAA1819 has already had a crop harvested this year</p>

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	<p>and is currently growing winter wheat. The land further down Lever Causeway between Marsh Hey Covert and Little Storeton Village is also being farmed.</p> <p>Therefore a very large proportion of SP030 is actually used for arable farming and not horse grazing as indicated. At a Council Meeting on 15 October, Motion 3 was voted on and carried unanimously. The first paragraph of this motion reads, also, as this parcel of land abuts Marsh Hey Covert, and covers an area between Marsh Hey Covert and a copse behind Stanley Avenue, the notes should also include that the area may include supporting habitat, as there is evidence of badger activity, owls and bats in this area. The areas also give protection to other local wildlife whose natural habitat will be eroded by any development. Having said this, we still remain of the view that no green belt land should be built on until all current available unoccupied housing is made available and occupied and brown field sites are used for new house building. We also remain of the view that the provision of 12,000 houses is far in excess of the likely population demand for those living or wanting to live in Wirral and would put incredibly extreme demands on the current infrastructure, resources, available jobs etc., if it ever came about. We look forward to receiving your comments on the various points we have raised in our emails in due course.</p> <p>[Paragraph 1 of motion 3 quoted & screenshot of p.52 of initial Greenbelt Assessment]</p>
DOR00501	<p>This is not what people voted for congested roads is a major concern. We have a good balance of rural, urban and countryside which plays a major part of our economy and contributes towards a growing tourism trade. I was aware of United Utilities carrying out a feasibility study for the building of 1000 houses at Claremont Farm (An economic success). On writing to Allison McGovern's office I was assured that any infringement on the Greenbelt would not be agreed to. I do not think that the Government meant such areas as the Wirral which has a falling population in parts (Heswall) to be subject to such thoughtless planning. 12,000 houses are planned by Peel Holdings on brownfield sites and if the same amount is built on Greenfield sites (Houses for the People? such as Port Sunlight which would take up less space) we will have 24000 houses. We should ask for a Government Enquiry as we cannot believe in the competence of this Council (which has not provided a local plan for 17 years) or the words of any politician. Due to the ongoing mayhem of Brexit there is a danger that a lot of matters of local concern will be put to one side to gather dust and hope that people will be worn down.</p>
DOR00502	<p>I wish to object to the proposed decision to release Green Belt land, particularly in the region of Lever Causeway and Mountwood Conservation Area. These areas are our heritage, once permission is granted it can never be rescinded. I accept that eventually, with population growth, pressure will increase to release land for housing, however, until all brown field sites have been developed, no decision should be made. Development in these areas will increase traffic congestion and pollution. Lever Causeway was gifted to the people of Wirral by a former Lord Leverhulme and is a wonderful amenity for exercise and leisure which would be severely undermined by development.</p> <p>[Representations submitted by residents of Mount Drive]</p>
DOR00503	<p>To say I was shocked and dismayed at proposals to demolish the Bromborough car park and build houses is an understatement. Bromborough is an old village and caters for a very high percentage of the elderly. To take this facility away from them is unbelievable and no thought has been given. Bromborough is a very busy village and family businesses have been present there for some time. This will result in Bromborough becoming a ghost town and one presumes that ultimately, the Banks will move out. The village itself cannot cope with parking in the actual village. I have never seen the car park empty, surely that must speak for itself. Please reconsider proceeding with this plan.</p>
DOR00504	<p>Land interests at Brimstage Road (SHLAA Ref: 1942) Summary of Detailed Representations with appendices:</p> <p>Whilst the commitment to review and consider releasing land from the Green Belt is welcomed, these representations set out key concerns with the evidence base material that has been released as part of this consultation. Given the fundamental issues that exist in this regard, we have prepared an evidence led representation that also considers:</p> <p>Vision Document was submitted in response to a Call for Sites should be referred to in conjunction with this representation as it confirms that the site is available, suitable, achievable and therefore deliverable. In the absence of an overarching statement or a draft Local Plan that pulls together the various strands of evidence it is difficult to gauge the intended direction. Some concerns about the methodology used in particular the Initial Green Belt Review. We consider it remiss to launch this consultation without clearly setting out a preferred level of housing growth or distribution. Our view is that the Green Belt Review should stand as a comprehensive evidence base document that is used to inform the final decisions. The 'Initial Green Belt Review' documents appears wholly confused and risks conflating several streams of evidence such that it does not represent a transparent, consistent and robust document that can be considered to properly assess the Green Belt. Examples given of limited approach in SP001 'North of Greasby' to claim the effect of fundamentally undermining the validity of the document as a means of considering the merits of one parcel/ site over another. Serious concerns that the work lacks rigour and clarity such that does not represent a transparent, objective and robust piece of evidence.</p> <p>i. In order for the Local Plan to be found sound it will need to contain a housing figure of between 735 and 900dpa – the mid-point being broadly 820dpa.</p> <p>ii. In respect of Settlement Area 4, using ONS and Valuation Office Agency figures and then applying NPPF paragraph 65 population factor, an appropriate apportionment (18%) of the Council's locally assessed OAN range would be between 132-162dpa – 148dpa being the mid-point as an absolute minimum. This figure should be considered as a starting point or minimum requirement and there could be a need for a greater proportion because of the constrained nature of Settlement Areas 1-3. Given the constrained nature of sub-Areas 1-3, i.e. lack of robust evidence that windfall sites will deliver the requirement based upon historic completion rates and limited Green Belt land adjacent to these areas, it is demonstrably clear that there is insufficient deliverable and developable land within or adjoining the urban areas associated with these sub-Areas (individually or collectively) to deliver anything near the 47% of the Council's locally assessed OAN range (between 346 and 423 –</p>

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	<p>385 being the mid-point, which equates to a total of 5,775 units over the 15 year plan period). Wirral Waters should not be overtly relied upon to deliver Wirral's housing requirement given the absence of any housing completions or detailed planning applications since outline planning permission was originally granted.</p> <p>iii. Having considered the likely yield of housing from within the urban area during the 15 year plan period, with reference to historic net housing completion rates and the Proposed Housing Allocations it is clear that exceptional circumstances exist in line with paragraph 136 of the NPPF and Green Belt release is essential if future housing needs are to be met. Clients view is that in SA4, sufficient Green Belt land needs to be released to accommodate a minimum of 1,788 dwellings during the plan period.</p> <p>iv. Assessment of all Green Belt parcels immediately adjoining SA4 and a further assessment of individual SHLAA sites, concluded that Parcel SP040 (equivalent to SHLAA site 1942, Land South of Brimstage Road) makes only a 'weak' contribution towards the Green purposes and is considered appropriate for release.</p> <p>v. It is clear from the analysis undertaken that no fundamental technical constraints have been identified in respect of SHLAA Site 1942 and that it is in a highly sustainable location. It should be carried forward for release from the Green Belt and identified as a Housing Allocation having considered all reasonable alternatives. Our housing requirement analysis has established that SA4 should deliver around 148 dwellings per annum, or 2,220 over the 15 year plan period. In order to understand whether Green Belt release is required, we will assess past net completion rates, the Proposed Housing Allocations and subsequently the likely yield from within the existing urban area of SA4 having considered these scenarios. Broad Spatial Options Revised Assessment Report and Strategic Housing Land Availability Assessment (SHLAA) (April 2018) not been published despite referring to it as a key evidence base document. Request the opportunity to comment once it is published. In the absence of the SHLAA 2018, it is not clear whether the site represents a suitable, available, achievable and deliverable housing site such that its identification as Proposed Housing Allocation is justified.</p> <p>SHELMA 2018 findings and the National approach to the Standard Methodology are cited.</p> <p>A technical review of 16 Green Belt SHLAA sites (adjacent to SA4) has been provided with a summary technical of constraints. Conclusions on Site 891 – Adjacent to Eastham Nurseries, Site 930 – South of Kingsley Avenue, Site 1769 – Adjacent to Travelodge Wirral Eastham, Site 1780 – Storeton Hall Farm, Red Hill Road, Site 1785 – East of Rivacre Road, Site 1786 – Hooton Park A, Site 1787 – Hooton Park B, Site 1819 – Land North West of Lever Causeway, Site 1930 – Land at Vineyard Farm, Site 1947 – North of Raby Mere, Site 1948 – Bromborough Golf Course and Hargrave House Farm, Site 1962 – Land bound by Rest Hill Road, Red Hill Road and Storeton Woods, Sites 1969 & 1963 – Land by Brimstage Road, Red Hill Road, Station Road and M53 indicate technical constraints and that the sites should not be carried forward. Site 1942 – Land South of Brimstage Road and Site 1984 – Land to the South of Old Clatterbridge Road had not revealed any technical constraints which would preclude the development. Our evidence-led approach has confirmed the sub-area housing requirement for SA4, justified the need for Green Belt release owing to a lack of urban capacity and demonstrated that from a technical perspective Land South of Brimstage Road is the most suitable location for residential development when considered against all possible alternatives.</p> <p>Detailed vision document was submitted to Wirral Council in January 2018 further evidencing the sustainability, accessibility and deliverability of the parcel. It is considered that the parcel constitutes a rounding off of the existing settlement. The overall contribution of parcel SP040 was considered to be 'weak', and land being promoted by Story Homes is also found to make a 'weak' contribution because of its closer association to the existing urban area. This is consistent with the Council's initial assessment of the site which is carried forward as a 'Site for Further Investigation', and is therefore clearly regarded as a site which is suitable for Green Belt release. A Landscape and Visual Statement is included at Appendix G. The document demonstrates that in landscape and visual terms, Land South of Brimstage Road (which is identified within 'Area A') is suitable for release from the Green Belt for residential development. Similarly Area B has a similar landscape character that is located within strong boundaries and relates well to Area A. Site Area A is located adjacent to the existing residential edge and adjacent to major transport corridors. Both these urbanising elements exert an influence on local character of areas A and B respectively. The areas are visually well contained by existing green infrastructure and existing built form. Areas C and D are considered to be more sensitive in landscape and visual terms, they are less contained and less influenced by urbanising influences. It is considered that these parcels are unsuitable for development.</p> <p>A Preliminary Traffic and Transport Report is submitted at Appendix H. Assessments show that the existing Brimstage Road/Old Clatterbridge Road T-junction could accommodate the requirements of a 300 dwelling scheme without the need for mitigation. The assessments demonstrate that further capacity for 900 dwellings can be made available by providing a roundabout at the location of the existing Brimstage Road/Old Clatterbridge Road junction. The site is within an acceptable walking catchment of a wide range of local services within Bebington, and at Claremont Farm and along Brimstage Road. There is a Marks & Spencer food store along Brimstage Road, additional convenience and healthcare facilities in Lancelyn Court Precinct and the Three Stags Pub. The site is also within walking distance of a range of educational facilities, places of worship, post office facilities, additional retail facilities including convenience stores, healthcare opportunities including GPs and Clatterbridge hospital, and various leisure and employment facilities in Lower Bebington. There are a number of cycle routes within an 8 kilometre catchment of the site, which is the recommended cycling distance recognised by Cycling England. These include linkages to the Wirral Circular Trail, which facilitates access around the peninsula via National Cycle Routes 56 and 89. There are a number of bus stops located within 400 metres of the site, providing regular connections to key locations across the Wirral and Merseyside. Nearest train station is Spital, located approximately 1.5km with regular services to Chester, Liverpool and Ellesmere Port. Client has secured an agreement with the landowner to actively promote the site for Development. Site is therefore confirmed as being suitable for housing. Client can therefore confirm that the development of the site is physically and economically viable, and that when all relevant factors are considered the site could be developed for approximately 300 dwellings in a way which is sensitive to the local character of the area. Site is therefore confirmed as being achievable for housing.</p>

DOR REF	RESPONSE
DOR00505	<p>I just wanted to voice my objections to the reclassification of the Green Belt land in and around Eastham, specifically parcels SPO 48-51. Eastham is the only location to have 2 petrochemical refining plants (nustar and nynas) which produce a lot of heavy emissions that can be smelt in and around Eastham most days. Eastham also has a major motorway and the A41 producing harmful levels of nitrogen dioxide and other harmful emissions. There are also numerous industries on the croft retail park and exhaust from the ships docked in the Queen Elizabeth dock with some ships less than 100 metres from residential houses. To remove green belt is removing the lungs of the area as priceless mature trees and hedgerows are removed which process these combined emissions. Reclassifying these parcels for further industry could add to already harmful levels of emissions as well as adding to flood risk i.e. parcel SPO48 Lowfields woods. Removing these pockets of greenbelt will mean there is 0 greenbelt on the East of the Wirral. The density of the populous in Eastham is one of the highest in the Wirral. Adding more residential dwellings will only increase the amount of congestion and place pressure on already burgeoning services including schools and surgeries. Wirral's historic villages including Eastham should be protected in their settings and landscape safeguarding tourism and local jobs which bring millions to the Wirral. One of the 5 purposes of the greenbelt is to preserve the settings and special character of historic towns. The recycling and regeneration of derelict and brownfield land must come first and then focus new development where there isn't the pressures already mentioned.</p>
DOR00506	<p>I write to object to the proposal to build on land adjacent to Grange Rd currently a field used frequently for animal grazing. The density of buildings in this area is more than enough, some green space is needed to enable people to feel that they are not encased by bricks and concrete. Children are often seen being shown the animals and thus get some wider education near at hand, when did you last come across sheep or cows as you walked to the shops? The practicalities of entrance and egress are paramount, cars descend to West Kirby at speed and often almost in a nonstop stream and adding further dwellings to the mix is creating more accidents waiting to happen, irresponsible. Please take these points into consideration when making your decision, hopefully not to allow new building there.</p>
DOR00507	<p>STOP destroying everything that is beautiful in the world!! STOP by building houses or industries on everything green!!! STOP trying to merge towns that were made to be separate! STOP adding to the traffic on the roads, the pollution in the air and the congestion all around. There are plenty of houses in and around Eastham. Leave the beautiful green land alone. Spend the money on more useful things like relaying the roads that have huge pot holes etc...</p>
DOR00508	<p>I am writing to lodge my formal objection against the council's plans to build on more green belt land in and around Eastham. In the last 4 years alone we have already seen new housing estates being built on brown sites, why do we need more on green belt land? Already houses are flagged to be built on the site of the old Lyndale School and Acre Lane School. Surely this should be enough for the area instead of taking the green spaces away. We already have too much pressure on the infrastructure as it is with the GP Surgery's full to bursting, you cannot get an appointment unless you wait for two weeks, the roads are full of pot holes due to the increase of traffic and the pollution in the area is already rising. Where are our children going to play, where are we going to walk, play sports? What you are suggesting is merging Eastham/Brombrough/Ellesmere Port together by building on the green belt land that separates these areas</p>
DOR00509	SAME AS DOR00455
DOR00510	<p>I am emailing yourselves to voice my concerns over the plans to destroy our green belt land. I moved Eastham village three years ago with a view to improving my then situation. I needed to find an area that was quieter with more green space for my child [with special needs]. Eastham is a conservation area which is steeped in history. With our house move choice was a good one. My husband has since been diagnosed with [health condition] so he needs to rest often and Eastham is perfect for him and my son. We are able to take walks down to the country park which aids our wellbeing and has improved our lives. We can watch over the river and see Liverpool airport and have quiet fields either side of our road with lots of wild life such as bats, owls and field mice. The proposals to build on green land surrounding us will be detrimental to all of our health. Our green space will be destroyed, the noise and traffic will become much louder causing stress to both my family with extra needs. [] Noise and you intend on making this worse for him. Our views of the Mersey and green space will be obliterated and pollution will be a lot worse. This historic village settlement will be largely ruined due to overcrowding and our wild life will be affected. May I suggest there is plenty of brown belt land to be used. EG, New Ferry is in dire need of re-generating. As there are not too many shops now, a smaller shopping area could be regenerated and shops brought closer together at the centre to create a community and houses built in that same area. This would create more business for the shops helping them to thrive and improve the area. There are other areas with derelict housing which could be built on. The very reason that I moved to Eastham was to improve our lives and this will be completely destroyed, not to mention devaluing my property. I for one am not happy and wish to put forward my feelings strongly. DONT DESTROY EASTHAM!!</p>
DOR00511	[SAME AS DOR00455]

DOR REF	RESPONSE
DOR00512	As trustees, the council do not and should not have the authority to turn our green spaces into housing or designate for industrial use. Why? your decisions do not consider key issues; impact to the well-being of residents and to future residents of the area, physical and mental health benefits. Also not considered are the effects to wildlife, destroying wildlife corridors, isolating protected areas affecting the diversity of plants and animals. I am appalled at Wirral council's constant attack on our quality of life. Your plans are horrible, charging for parking at our local woods, planning to take away hubs of local communities (Bromborough Civic centre) and re-designate for housing. Poor housing being built with lack of affordable homes, no trees being planned as part of new build developments. You sold the land formerly Bromborough Secondary school for the purpose of housing, yet years later, not one brick has been laid. Disgusting. More effort needs to be made to identify brown field sites. There seems to be plenty of areas around the Wirral that are derelict. Do your jobs. Stop stealing from the community. Your mismanagement upsets and angers me. As a parent, I want my children and their children to enjoy this area for the reasons that I have. I will not vote for you while you blunder from one poor idea to another and it sickens me that our taxes fund your ineptitude
DOR00513	[SAME AS DOR00455]
DOR00514	I am totally against the proposal to build on this land. There is the aesthetic aspect of keeping these areas of greenery in West Kirby which is to me of great importance because it is better for a community to live with some space within it and not be enclosed totally by buildings. Of great importance with these proposals is safety. Grange Road is an extremely busy road and to enter the side roads already there e.g. Gerard Road, Heatherdene Road etc. and for drivers to exit them is notoriously difficult. Try turning right into Gerard Road driving down the hill or try entering Grange Road from Ashburton Road and you will quite easily see my point. The proposal to add even more traffic entering and exiting Grange Road is to my mind foolhardy and dangerous. Please reconsider your plans
DOR00515	I am writing to object to green belt proposals in Eastham. Specifically the following land parcels SPO 50, SPO 51, SPO 52, SPO 53, SPO 54 and SPO 55. Green belt land should remain as such and the council should not re-designate it. As a resident to the area I am concerned that these plans are tantamount to urban sprawl in a conservation area. Eastham village is a historical site and the neighbouring country park should be a protected environment. These plans would encroach on the countryside and local eco system and the setting of the historical Eastham village will be altered and forever damaged. The roads are already barely good enough to service the existing homes and business, if plans to build further sites continue the traffic and resultant pollution would be extremely damaging. We run the risk of merging with local towns and thus contributing to severe urban sprawl in the area. The area is home to many families and children and the increase in pollution and traffic will be dangerous. I personally do not want to live in an area dominated by industry and devoid of green spaces and getting rid of so many more trees which would be of detriment to the environment and eco system. This landscape deserves to be protected from such developments. Please accept this as a formal Objection to the plans.
DOR00516	I attended the discussions at West Kirby. My views and comments are as follows. I have prior to retirement worked for a Liverpool property developer and I vote Green with nature and biodiversity conservation at the forefront of my thinking. I have also lived overseas and have first-hand experience of overseas built environment 1. It's a given that the natural unbuilt landscape-including farmland - and views of trees, other vegetation, and wildlife stimulate feelings of wellbeing for all people especially important these days with ever more mental health issues. They make us feel good! So it seems logical to avoid building on naturally attractive sites and sights even if this means getting more into council coffers. 2. We need more housing clearly, with the ensuing infrastructure of schools and roads. This could quite easily be done without building on current Green Belt land especially not on land designated by nature organisations as Survey sites e.g. WeBs Surveys. The solution is to build vertically not horizontally. 3. In pretty much every other country families happily live in horizontal apartments with either a large balcony and or communal land which has play areas and plenty of vegetation (I also directed a landscape construction company in Europe and the Middle East.) It is the landscaping of and around community developments which is the important factor in attracting owners. Most continental cities of Liverpool's side have outskirts comprising 4 or 5 storey blocks set amongst grounds and attractive in their own right. Just do some research in Europe! Mixed use with decent shops including fresh produce markets isn't impossible to design. This also leads to a community spirit. 4. If the government want us to create more housing on urban space they must provide you with the funds to do the research of soil contamination, UXBs etc, bat surveys etc and not leave that to the developers or yourselves. Leave the green belt alone. It's good for us and our animal friends.
DOR00517	I write with reference to the suggestions in your leaflet regarding building on Lever causeway and I along with my family totally OBJECT to any plans going ahead. I'm 54 yrs of age & since I was a tiny girl I have spent my childhood / adult life enjoying what little countryside we have here on Storeton Road/ Mount road & Lever causeway. My dad would take me & my siblings for long walks to enjoy the outdoors/ countryside & to see the horses kept in the fields. I spent my childhood/ adolescent years along with family & friends enjoy the countryside. I hold many dear memories especially more so since my father passed away Xmas 2017. I even live close to Lever causeway for the very reasons mentioned being the emotional attachment/ very dear & fond memories of my dad & that of my childhood. But even now in my adult life I enjoy walks around the country lanes / Lever causeway. So for this to become a totally urbanised area would force me to have to move away from a place I love dearly for the reasons of the aforementioned. We PLEAD with you to put a stop to this as it isn't good for the conservation of trees / wild animals / bird wildlife. It's appalling that a plan like this is even being considered. DOORSTEP DESTRUCTION/ DETRIMENTAL DAMAGE/ LEVER CAUSEWAY LOST FOREVER is putting it mildly don't you think. And YES PROTECTION IS PARAMOUNT.

DOR REF	RESPONSE
DOR00518	<p>My thoughts on “The Plan” to build houses on the Wirral:-</p> <p>(i) it occurs to me that Ministers setting house building targets should be asked to justify their figures and explain why Wirral will require such a quantity as they describe?</p> <p>(ii) what plans are there to supply the finances needed to develop the supporting infrastructure and skilled Human Resources needed for an increased population- is it an holistic plan?</p> <p>(iii) I along with thousands of fellow Wirral residents am deeply concerned about the possible loss of countryside, the very real chance of failure to prevent urban sprawl, the very thing good planning should avoid. I note that many of the possible greenbelt areas which may be developed are very close to the M53. Here there is a huge chance of worsening traffic congestion, I ask “What plans for road building and adjustment?” My final thoughts in connection with house building within the motorway affected areas, is to draw attention to much press discussion currently being applied to health hazards when dwellings are close to heavy road traffic. Polluted air causes heart and lung disease as nitrogen dioxide and soot particles are breathed in. Now scientists are linking traffic fumes to a rise in the number of dementia cases in those living near busy roads. I offer these thoughts in good will and in the hope they may be among those that are considered at this consultation opportunity.</p>
DOR00519	<p>Upon reading the communication from the Council, with regard to the building on land in Storeton lane, Barnston, I feel the need to reply. Firstly, I would ask if the target of 800 homes per year for a long period of time is accurate. Have the people who set this target carried out a detailed survey of the Wirral? The Wirral peninsula is not massive, and traffic flow at times is congested. An example of this is the area around the Arrowe Park roundabout, in all directions at rush hour. More houses = more cars, resulting in longer queues. Secondly, in relation particularly to the proposed development in Storeton Lane, between the houses Banagher and Fairfield. This is farmed by a tenant farmer and I believe the land is part of the Leverhulme estate. Storeton Lane is very narrow from just after Bank Farm to Banagher. There have been several incidents of cars hitting the sandstone outcrop under the converted barn, due to cars pushing through. The traffic flow at rush hour is colossal, queues heading out to Barnston road can stretch back to Barnston Learning centre, some 200 metres away. Coming the other way queues form back past Manor Farm one way, and down to the Fox & Hounds the other way. I walk my dog several times a day and will not go through the narrow stretch, as just one person walking causes cars to wait if one is coming from the opposite direction. There are times when schools, which are using Barnston Learning Centre, walk down Storeton Lane to Barnston Road. This can be 30+ children and teachers. To place 50 houses on the aforementioned field would add at least 50 cars, if not more. For cars attempting to access Storeton from there, particularly for travelling to work or school would prove a logistical nightmare. There is a 30 mph speed limit on Storeton lane, and believe me not many adhere to it.</p>
DOR00519	<p>Daytime can be better but at evening, particularly when dark, it becomes a racetrack in both directions. When walking the dog I see cars which must be travelling at double the speed limit, and motorbikes are worse. You can hear those coming out of the narrow section changing gears and by the time they pass our house, about 50 m from the narrows, they hurtle past. When requested to carry out speed checks the police reply there has been no one killed or seriously injured so it is not required. They also have less manpower. I can remember one incident within the last couple of years when an injured person had to be lifted to hospital with severe head injuries, and that was approaching the narrow section. The woodland at the rear of the field is I believe listed as a SSI and is owned by the residents of Woodcroft. Houses with children on the edge of woodland equals a great place to play. There are also badger sets, with one entrance/exit being in that field. All in all I feel this site has been selected without an in-depth survey into traffic, road restrictions, wildlife and the SSI. My last question would be how many brown sites are being utilised for building and how many of these sites have been purchased and are now sat on by the developers? For whatever reason, land value et cetera, the developers should be made to build within a short limited time or lose the land to a developer who will build immediately. The council’s intention of building on Greenbelt land has stirred up people’s emotions and as has been said in the past by at least one councillor, who may be the current leader, that Greenbelt should be protected.</p>
DOR00520	[SAME AS DOR00455]
DOR00521	[SAME AS DOR00455]
DOR00522	[SAME AS DOR00455]
DOR00523	<p>Democracy is being attacked from many directions and we the people, the people you are supposed to serve must oppose this trend with every fibre of our beings. Our history is being denied and re-written by the politically correct and our children are being taught, again by the politically correct, to have no pride in our forefather’s achievements and sacrifices. Faceless individuals make decisions, without any thought for the future, to accommodate big business and to suit their own agenda. A few years ago Wirral Council chose to close Eastham village school even though the demographics indicated that more school places would be needed, the council knew best. Now the same council has had to spend huge amounts of money to extend Heygarth Road school as the residents of the village had forecast and had been denied by Wirral council. The Green Belt was designed to PREVENT the sprawl of built up areas, safeguard the countryside and preserve the setting and special character of historic places. Eastham is one of oldest villages on the Wirral and was mentioned in the Domesday Book yet some small-minded nameless and faceless group are determined to obliterate this lovely old village and almost merge it with Ellesmere Port a town unrecognised for its beauty or historic interest. Consider what you intending to do to this historic village it will be lost forever to future generations and will become part of a sprawling mass. Sadly, those who destroy our heritage are never punished when their folly becomes apparent.</p>

DOR REF	RESPONSE
DOR00524	<p>I write to appeal against potential plans to release Green Belt for building on the fields either side of Levers Causeway and Mount Road, Higher Bebington. I am writing to oppose Wirral Borough Council's local plan reference SHLAA2024. The Library and Civic Centre are a vital part of the community of Bromborough. For local residents especially the elderly and school children who use the Library, travel to the nearest Libraries in Eastham and Bebington is not easy if you do not drive, There are few venues in the Village of the size of the Civic Centre which can accommodate large groups wishing to hire a hall and the other venues for the many community groups and activities in the Village are already heavily booked and have little capacity to accommodate further bookings. The community life of the Village is currently growing stronger and removal of these buildings would be extremely detrimental to the community of Bromborough. I hope therefore that the Council will re-consider their proposal to earmark these sites for development. I am writing to oppose Wirral Borough Council's local plan reference SHLAA2025. regarding Allport Lane Car Park. Parking in Bromborough Village is extremely difficult at times as the car park is full for most of the day. Closing the Car Park would lead to congestion in the surrounding roads and cause parking problems for the Parish Church when there are large services being held, especially funerals. Closure of the car park would also be extremely detrimental to the Village traders and could force many of them out of business, many have already suffered loss of business to the Croft Retail Park. I hope Wirral Borough Council will consider the consequences of such a proposal which would do a great deal of harm to the community of Bromborough</p>
DOR00525	<p>I have grown up in Higher Bebington and at 47yrs still live here – on Thornton Road. This place, spot is already surrounded in most directions with homes and buildings. The Green Belt that is available, including Levers Causeway and Mount Road is a rest bite for lots of people from within and outside the area. Its accessible for people who want somewhere to learn to ride a bike (up the causeway), to walk, to run, to sit perhaps and get some fresh air and contact with nature. I suffer from mild depression and after a major health scare two years ago, I struggle periodically with my mental health. I am not alone, most people in their lives will have mental health issues and being close to nature, to get out and walk which can be done easily in both Levers Causeway and Mount Road helps 100's of Wirral residents daily. As far as I am aware, there are sufficient urban areas that can be built upon and many Brown field sites that are underdeveloped. Such a development that is being proposed would be a serious mistake in terms of the environmental impact that would be made on local agricultural land and natural habitats for wildlife and will fundamentally change the character of the area for good. Please don't do this.</p>
DOR00526	<p>I wish to object to the council's current proposals /local plan for use of land in the Eastham area for housing /industry. Including the loss of the green belt land which the current plans aim to reclassify. The six parcels of land identified in the Eastham area should be preserved as green belt and not reclassified. I think Eastham has contributed more than its fair share to the housing and industry needs of Wirral. Eastham village and its surrounds is an historic medieval area and should be protected as such within its current landscape setting. Why are the principles which underpin the green belt purpose now being woefully disregarded? Why wouldn't the council want to adhere to them and Check the unrestricted sprawl of large built up areas? Prevent neighbouring towns from merging into one another? Assist in safeguarding the countryside from encroachment? Preserve the setting and special character of historic towns? Assist in urban regeneration by encouraging the recycling of derelict and other urban land not green belt? I object for all the reasons identified above.</p>
DOR00527	<p>I live in Heswall and use this route on a regular basis I would like to raise my objections to the potential building on Lever Causeway Green Belt land. My reasons for this are as follows: It will spoil the character of the area. Some unique Unrivalled views will be destroyed, causing irreparable damage to some beautiful setting. Unnecessary Increased traffic and major congestion plus Acres of prime agricultural land will be lost and unwanted Damage to Mountwood Conservation area. The Use the Wirral's already empty 5,000 properties and the already existing space on brownfield sites is more than adequate for the expected housing purpose.</p>
DOR00528	<p>Please stop the devastation of The Wirral Greenbelt.</p> <p>I am placing my objection to stop the projected planning permission to build a vast number of new houses on the Wirral Greenbelt. The proposed plans of Building in front (Levers Causeway) and in the rear of Stanley Avenue, Higher Bebington, contravene the NPPF and will lead to unrestricted sprawl of large built up area and merging towns, Storeton Village, Higher Bebington and Prenton. The Government website quotes the preservation of Greenbelt; No merging of communities/towns/villages separated by Greenbelt. The Wirral Greenbelt, Lever Causeway surrounding land front and back of Stanley Avenue, Higher Bebington, are a peaceful haven that holds an important role in providing zone designation to retain areas of largely undeveloped, wild, or agricultural land surrounding our neighbouring urban areas. A border preventing urban sprawl and development of an area, keeping land permanently open, allowing wildlife habitats to remain and the Greenbelt acting as Air Pollution control Wirral residents are angry with the bullish tactics of local government and the Government's. Wirral residents feel that the Council will not listen to our objections and our voices will not be heard as the Elected Wirral Council are pushing this project through come what may and against residents wishes. I believe sites have been identified in existing Brownfield urban areas to build on, to redevelop, re-occupation/refurbishment of existing houses, Urban regeneration and Eco regeneration of Brownfield sites. Build on Brownfield sites, save the Wirral Greenbelt. Protect our backyard. The actions of Wirral Councillors, if they accept this proposal, will result in the loss of our Greenbelt within the Wirral peninsula forever. The local Government and the Government should be listening to the local residents/voters who have signed petitions, voiced our objections the existing proposed plan. We all want to preserve our Wirral greenbelt for future generations, permanently.</p> <p>The Wirral is steeped in history with historic towns. Anglo Saxon battles sites taken place on the fields around Levers causeway plus a Victorian Quarry near Lever Causeway that supplied local sandstone to build most of the historic buildings on the Wirral. The Wirral was also The Royal Forest for the monarchy. We have protected wildlife on these green belts. Once the Wirral's Greenbelt is targeted it is LOST FOREVER.</p>

DOR REF	RESPONSE
	<p>To date, the Wirral was voted the Third best place to live in the North West and Bebington was voted one of the best places to live in the UK. Let's keep these merits by not destroying our Greenbelt. The Wirral is virtually an island surrounded by water on three sides, and the Canal, that is why The Wirral Greenbelt is so important and why it should be protected permanently for the future. Levers Causeway and the surrounding fields are the lungs of this section of the Wirral. If this land is released it would also cause destruction of the area around Stanley Avenue, Higher Bebington, noise, air and traffic pollution, destruction of roads, natural habitat, increased traffic, congestion, acres of prime agricultural land lost forever. The result would cause a damaging effect on Mountwood Conservation Area, Wildlife and existing residents.</p> <p>It is only the private developer that gains if the Wirral Greenbelt is built upon. The Wirral is recognised Worldwide for its natural habitat, beauty and quality of life due to the area not being over developed and it's Greenbelt Higher Bebington, Stanley Avenue, has always been a Cul de Sac, it is a quiet haven; Storeton Village and Higher Bebington are separated by Greenbelt, the natural beauty can be seen in pictures below, showing the back of Stanley Avenue and down to Storeton Village and beyond.</p> <p>This greenbelt are the lungs of the Wirral counter balancing the traffic from the M53 etc., the Greenbelt holds protected species of Wildlife. This present plan will ruin the Wirral Peninsular. For us at Stanley Avenue this proposed building plan will forever ruin the front and rear of Stanley Avenue, Higher Bebington and Mountwood Conservation Area. In Higher Bebington and Prenton, there are housing stock up for sale. At the back of Stanley Avenue the field has always been Greenbelt as the pictures below shows the uninterrupted views down Lever Causeway to Storeton and beyond that have been there since way before World War 1. Stanley Avenue has been a Cul de Sac for more than 50 years. Stanley Avenue area has been a natural local habitat for Natterjack Toads and other Wildlife, which used to cross the road the from the field at the back and Three Stacks, Stanley Avenue through into our gardens to the fields and into the wood on Lever Causeway. Stanley Avenue and the surrounding fields have always been a quiet haven full of wildlife.</p> <p>The planned building sites on either side of Lever Causeway are huge. If this land is released this would cause historic Storeton and Bebington to merge which goes against Government policy to safeguard the countryside from encroachment, destruction, noise, air and traffic pollution, increased traffic, congestion. Acres of prime agricultural land lost forever. The damaging effect this would have on Mountwood Conservation Area, wildlife and existing residents. It would destroy our neighbourhood.</p> <p>Instead of planning on Greenbelt the council should have been planning Wirral Urban regeneration by encouraging the recycling of derelict urban land. Think Eco.</p> <p>Refurbishment of existing empty housing stock and buildings. Look at improving activities and interests even more on the Wirral by making Storeton and Lever Causeway into an Anglo Saxon tourist site utilise the only existing Anglo Saxon Buildings in Storeton Village, the dig site and where the Anglo Saxon battles took place. Seasonal Medieval Falconry displays, activities. Apply for National Lottery Funding. Organise planned cycle rides around historic Wirral. Show off our Viking history, the Wirral Greenbelt Royal heritage. Save the Greenbelt from destruction it is our backyard, our heritage, protect permanently now and future generations. Build on Brownfield sites.</p> <p>The local government and the Conservatives Party, could become the destroyers of our countryside and result in the over development of the Wirral. Which is unforgivable.</p> <p>A signed Petition has been completed by Wirral resident to say no to building on Green Belt land and disproportionate amount of houses to be developed on Lever Causeway fields. Protect Lever Causeway and the surrounding Greenbelt and the long-standing Greenbelt behind Three Stacks, the Mountwood Conservation Area. [Photographs attached]</p>
DOR00529	<p>I write in connection with the above planning application. I have examined the plans and I live within the site. I wish to object strongly to the development of houses and industry in this location. Eastham is a dispersed settlement where development proposals should be considered very carefully: infilling could ruin the character of the village while estate development would overwhelm it. The narrow structure of Ferry Road would not allow for more traffic and heavy vehicles and the disruption for current residents would be horrific. Developments would reduce the house prices of existing homes leaving residents of Eastham wanting to move out of the area. Although there will be more residents by building new developments it will restrict visitors wanting to visit Eastham country woods therefore reducing the spending from visitors on parking, small businesses such as Mimosa Café and the old station café as well as the tap. The quality of life for residents in Eastham would deteriorate due to less green space, less trees and wildlife. Eastham village is one of very few places that still look like they did in their heyday. Increasing developments around it would surely destroy the character of this lovely quaint village. The increased building work would surely have a negative effect on the Woodland burial ground. It is a serene place to go and remember loved ones and reflect. The proposed siting of the development SPO54 and SPO55 is particularly ill-considered: it is on a Greenfield site used by many villagers and tourists for recreation and walking dogs, and building here would diminish the striking view of the river and woodland as well as reducing house prices in the area. Eastham already has enough large houses and affordable housing. As an alternative to this proposal, we would support the construction of a terrace of houses on the land purchased from Eastham Golf club, if it was ensured that these were affordable homes for local people. I moved to Eastham over 5 years ago and the reason I chose to live here is because of the green space and fields and particular village feel. I do not want to live in Eastham if it is so built up it merges with Ellesmere Port. Surely this is why the government introduced green belt land. As a resident of the Chapel Walk estate we pay a yearly fee to protect the land. How is this fair for this land to be developed on when residents have been paying thousands of pounds every year to protect it.</p>
DOR00530	<p>I wish to add my name to the list of concerned residents opposing the release of green belt land for building housing. It seems somewhat absurd to do this whilst brownfield areas remain undeveloped. I also question the reasoning behind releasing land excessively on one side of the M53 and not the other.</p>

DOR REF	RESPONSE
DOR00531	<p>I would like to see consideration of an alternative approach to releasing BLOCKS of green belt, and ‘filling in obvious gaps’ in existing built up development. There’s an element of simplicity in the above approach. Identify land, compulsory purchase it, sell it to a developer, bank the difference and wait for the housing crop to grow. Without any real control over the selling prices of the generated property. Here is an alternative view. A plot of land for a house might be about 10m wide. For 7500 houses that is a length of 75km. If you were to build 1 double sided street around the perimeter of each existing built up area what would be the total length of this street? The distance it would penetrate into the existing green space would be maybe 40 metres. The fact that each of these perimeter streets would be new would enable the provision of new drainage infrastructure to both the new and each of the existing built up areas they surround, new conduits for facilities, gas, electricity, cable, broadband fibre. So that in addition to increasing the housing stock with minimal penetration into the green space/green belt we also improve and enhance the services for thousands of extra properties. In addition, the very nature of the perimeter streets would mean that they would pass by existing mixed housing stock, and if the new properties were sympathetic to the existing stock that would naturally generate mixed stock, and mixed price ranges all being naturally affordable within its own area.</p> <p>Further, this should not just be land handed over to developers, the council should contract the builders to build while the council retains the land, and the rights to the ground rent. Some of the properties can remain within the council portfolio. This approach could be considered anywhere in the national scheme, even Oxford. Preventing the creation of disconnected satellite estates of houses with additional traffic and services provision which only serve the isolated estate and cause additional points of congestion. This is not the EASY way, this is not the CHEAP way, but I think it might be a better way.</p> <p>ENERGY.</p> <p>1: Linear Lagoon Tidal Turbine</p> <p>We have some lengths of waterfront on both sides of the River Mersey which are redundant industrial frontage, or solid dock wall. Each stretch of such bank could be used for tidal turbine power generation. Simply by extending out into the river by maybe 5 metres. Building a secondary wall with tidal turbines built into the wall along its length. This is not the kind of billion-pound, high environmental impact scheme that was recently proposed for Swansea bay. This is something that could be expanded incrementally over the years as and when the costs of implementation reduce, and payback terms increase.</p> <p>2: The River Dibbin</p> <p>The Dibbin flows into the Mersey at the Port Sunlight River Park, where there is already a significant amount of structure controlling the flow. This exit area could itself be converted into a small scale tidal turbine pool, which would have the double effect of reducing the tidal effects on the Dibbin itself. Improving the environment around the new housing developments.</p>
DOR00532	<p>I am writing to express my concerns and sadness after reading the local plans and attending the meetings arranged concerning the proposed green belt use.</p> <p>As a resident of Wirral all my life I have grown up with the beauty of the Wirral with its open areas, parks and wildlife. Whilst living on the Wirral over the years i have seen a lot of changes whereby more and more open spaces have been used for housing. It is therefore important that we safeguard the areas that remain in order to ensure Wirral does continue to be a truly beautiful place to live, not just turning into a concrete jungle. As a parent I feel my children have benefited from living playing and growing up on the Wirral and its countryside and hope that this will continue for my grandchildren too. It is with sadness that I see the local plans are planning to change the open spaces we have to use for housing rather than find alternative solutions The plans show that one of the areas greatly affected appears to be the areas close to the M53 Eastham Bromborough Bebington Storeton etc. which currently is farm land open fields would greatly effect wildlife and having a damaging effect on conservation of the areas I therefore strongly object to the local planned ask that the plans are amended and alternative solutions sought</p>
DOR00533	I am writing to lodge my objection to any proposed housing developments, on any green belt areas on the Wirral, in particular the area of Levers Causeway!
DOR00534	[Enquiry not a response]
DOR00535	<p>I wish to formally advise you of my opposition for releasing Greenbelt land for building on the fields either side of Lever causeway and from Mount Road towards Storeton. The proposed development would destroy the Lever causeway environment and its open spaces which I utilise on a daily basis. I have been brought up living adjacent to Storeton woods and this has provided a beautiful locality to grow up in. This fantastic scenery would be destroyed by the building of homes that according to the population projection are not required in such numbers. It would completely change the whole area that is enjoyed not just by local residents but by members of the public who travel here to enjoy the beautiful landscape and country walks with family and pets.</p>
DOR00536	<p>It is with astonishment I find out about a Council proposal to decimate and destroy the last remaining Eastham green belt areas including the village Conservation area from a flier posted through my letter box by a concerned group the Eastham village Preservation Association. How, when and where do the council; elected to protect and enhance the lives and conditions of the resident electorate, plan to involve, inform and consider the will of the people. If you ever went through Eastham too see how popular, busy and congested it and the surroundings areas get at weekends and peak times... the traffic trying to squeeze through Eastham at peak times causing pollution, noise and probably leading to more deaths and illness to the elderly and young alike as indicated in recent government reports about the increase poisoning of the atmosphere which is only being resisted by the bit of green space still standing... which you propose to destroy and increase the congestion, noise and pollution. It is virtually impossible for local children to get into the schools of choice at present without adding an even greater amount of families to the area, again increasing the traffic and hazards already existing in and around schools.. again only leading to increased risk to our children’s lives and safety, the roads are rammed around schools it’s ridiculous to even think of increasing the pupil intake. Travel to Eastham Ferry on any weekendwhy are they all coming to this green area with trees, fields, wooded walks, river views, dog walking and child friendly play</p>

DOR REF	RESPONSE
	area... this area has been popular for over 150 years as people came to enjoy the natural way of life, an idyll that was disappearing and being replaced by urban sprawl and industrial blight. If the council need to build continue on all the brownfield areas. Force the building companies to build on the land they already own, that they are hanging onto as land prices increase to increase profits at the expense of existing residents ... they have no interest in the area or community and will not contribute in a positive way to the lives of existing Eastham residents. Stop this foolish, short-sighted vandalism of Eastham Village... before you ruin and spoil the lives of all the existing tenants.
DOR00537	I am completely opposed to the proposed change of use from that currently to 'mixed use including housing' for these two sites . Bromborough Civic Centre (SHLAA2024) I use this Centre Monday meet up with a group organisation health walk . Wednesday I do yoga in main Hall Friday is Zumba gold . Thursday often visiting the library. Weekend shopping in the village. This is a community centre and a brilliant one at that . Allport Lane Car park Bromborough (SHLAA2025) I use this Car park to visit the Hall . Shopping / Activity's/ U3A meeting friends .
DOR00538	[SAME AS DOR00455]
DOR00539	Please note we both object strongly to the councils plans for the Eastham Green Belt.
DOR00540	I want to oppose the proposals to take wide swathes of the Wirral out of Green Belt protection. on the following grounds. <ol style="list-style-type: none"> 1. It is becoming clearer that the population growth figures have been pitched at a far too high figure., Planning Officer, told the Consultation meeting at Pensby High that the Council are now employing an independent statistician to query the figures. So there is doubt at an official level. 2. There is sufficient brown field space , with especial reference to Wirral Waters land at Birkenhead Docks. 3. I cannot imagine that affordable housing will be built on the countryside areas under discussion. 4. The proposed plans allow for Bebington to be joined to the ancient and Domesday Book village of Storeton., destroying their separate characters and historic relevance. 5. Most of this threatened Green Belt land is in use for farming - crops and livestock. Mixed use at e.g. Claremont Farm. This land is also important for wildlife. 6. There are thousands of empty properties on Wirral that should be brought back into use. 7. Many of the areas under consideration have distinct character and are so important to quality of life. 8. Open spaces are the Green lungs of our small peninsula. There are many footpaths across farmland, giving the public access to the countryside for exercise , relaxation and unrivalled views. 9. There are many narrow and characteristic country lanes, in the proposal areas , which are unsuitable for large quantities of extra traffic.
DOR00540	I would like this video I made this October, to be counted as evidence to the Local Plan Consultation process on Wirral. I walked the fields and lanes of several parcels of Green Belt land under threat and noted important landscape features, land use, farming, history and wild features. The land parcels include SP033, SP034, SP036, SP037, SP041 . There is an error in your Summary of Initial Green Belt Assessment September 2018. On page 52 the agricultural land use for SP030 has been classed as pasture and horse grazing. In fact, the land under SHLAA1819 on site SP030 is actually used for farming arable, and has been for many, many years. Recent soil reports show the site as containing very good quality soil. SHLAA1819 has already had a crop harvested this year and is currently growing winter wheat. The land further down Lever Causeway between Marsh Hey Covert and Little Storeton Village is also being farmed. Therefore a very large proportion of SP030 is actually used for arable farming and not horse grazing as indicated. At a Council Meeting on 15 October, Motion 3 was voted on and carried unanimously. The first paragraph of this motion reads, "This Council requests that renewed importance should be attached to the protection afforded to agricultural land as the responses to the Local Plan are considered. Land that is currently in productive agricultural use should not be removed from the Green Belt in view of the need to safeguard future food supplies." I am told that you have been sent a photo of the field, in question, full of wheat. taken on 17/6/2017. Also, as this parcel of land abuts Marsh Hey Covert, and covers an area between Marsh Hey Covert and a copse behind Stanley Avenue, the notes should also include that the area may include supporting habitat, as there is evidence of badger activity, owls and bats in this area. The areas also give protection to other local wildlife whose natural habitat will be eroded by any development. Please find a photo , taken yesterday, 25 October 2018, of a winter crop sprouting in a Green Belt field at the top of Lever Causeway . Bounded by Mount Road and Stanley Avenue. In the Local Plan documentation this is wrongly labelled as a horse paddock, instead of the more important agricultural designation. (Horse paddock is out of date information). [Photo provided] I found the consultation presentation enlightening. The process of the planning has been well explained. I don't agree with the large chunks of green belt land being considered, on principle. Yet I understand more clearly the efforts and constraints of the planning department. I personally and many others feel threatened by this wholesale acreage of land under discussion. I hope that Wirral Waters scheme will deliver the housing need. I appreciated [council officer]'s considered presentation and answering questions. I need to know that the calculations numbers are correct.

DOR REF	RESPONSE
DOR00541	<p>It is absolutely absurd that the council have tabled this plan without exhausting all other opportunities that I have raised in my letter, this includes brownfield urban regeneration sites, unoccupied homes on the Wirral and accelerating the development of houses where planning permission has already been granted; all of which would contribute significantly, if not deliver all, of the 800 homes that we have been asked by central government to provide over the coming years. I also consider it despicable that these proposed plans that include Prenton Golf club for future house development, with over 100 years heritage, would remove from the Wirral a recreation facility that is dearly treasured by local residents and is in clear violation of the NPPF policy. I am sure these plans will be legally challenged and with the strong will of the Wirral residents, it will only be a matter of time. I wish to raise these points and ensure that they are debated during the public consultation period and that common sense will prevail. I am utterly shocked that councillors that live on the Wirral and have been elected to represent the constituents are not fiercely opposing these outrageous plans, in order to retain our beautiful green belt that supports the wildlife and our Wirral heritage.</p>
DOR00542	<p>I am writing to strongly object to development of green belt land as proposed to meet the alleged target for 'affordable' housing. The proposals will result in the loss of green spaces FOREVER, which will be the legacy of this Council will be remembered by going forward to elections. I am a Labour Party member but will immediately remove myself from the party if your proposals go ahead as suggested. Further, I will NEVER vote Labour EVER again.</p> <p>My objections are due to the following:</p> <ul style="list-style-type: none"> . Local population growth figures do not substantiate the housing targets identified by the council/ DCLG.. Under use of existing empty housing. . All efforts should be made to identify and expedite any planning applications currently 'stuck' in the system. . All efforts should be made to approve any planning applications that have been approved but no development has started. . Land values on Green Belt may not be sufficiently profitable to enable developers to build affordable homes- which means more expensive homes are built instead. . Isolated nature of Green Belt sites may result in poor access to local facilities e.g. regular public transport, shops etc. . Loss of biodiversity and public amenities, e.g. access to natural habitats, woodland, footpaths and bridleways etc. . Severe potential negative impact on core services: health care, education, transport (extra pressure on already inadequate access roads to high employment areas such as Liverpool via the tunnels, Clatterbridge roundabout, the M53 and Chester High Road). Not to mention increased traffic at all major junctions across Wirral. . Poor employment opportunities for new neighbourhoods.
DOR00543	<p>Support for house building if it increases the pool of social housing</p> <p>Support for house building at the lower end of the market, that improves the chances of young people buying their own place</p> <p>NO SUPPORT for building on Green Belt - there is no reason to damage the environment on the Wirral (it's main asset) by building houses which would primarily be for the better off. The council should dig their heels in on this, while meeting government targets using all brownfield options and concentrating on developments which would help ease the housing crisis.</p>
DOR00544	<p>As former residents of the Wirral for over 40 years, living in both Heswall and Irby, we write to lodge our objections to the draft proposals for Green Belt allocation for new housing, for the following reasons :An increase of potential housing on this scale and the destruction of any areas of Green Belt land would irreparably damage every aspect of life on the Wirral, causing loss of amenity and public open spaces, natural habitats, woodland, footpaths and bridleways, all of which once lost can never be replaced. There is insufficient infrastructure to support such large-scale development with surgeries, hospitals and schools already under pressure; limited access to public transport in many areas and limited employment opportunities as well. We do not believe that local population growth figures substantiate such massive over-development especially when added to the planning applications already approved but not yet started, other proposed planning applications and empty properties throughout the borough. We can see all too clearly here in Northumberland that the wrong sort of houses are being built on Green Belt land : four or five bedroom luxury detached properties, well out of the reach of first time buyers and useless for retirees who wish to downsize . Obviously these 'exclusive' developments are where the biggest profits are to be made for developers, and exactly the same will be true of the Wirral and other areas.</p>
DOR00545	<p>I am writing to you to register my strongest possible protest at Wirral Council's proposed release of all green belt land east of the M53 for potential development. I am appalled and astounded that it is deemed acceptable that the already more densely populated and industrialised half of the Wirral peninsula, can afford to lose what little open countryside we still have left to enjoy. Indeed the proposal itself appears to flout the first three purposes for including land within green belt set out in the National Planning Policy. The impact of such development on my local area alone would be significant with greater pressure on already stretched local services and communities. In addition, to add to an already overpopulated area would lead to greater congestion on already busy roads with the associated effects on air quality and public health that that would bring. The effects on mental health are also a huge concern, with the rise in mental illness the scourge of modern living. As a society we are encouraged to get out more, exercise more and enjoy the great outdoors. The benefits to our physical and mental health are irrefutable and are expounded by every health care professional. So it begs the question why our local council would make this even more difficult by reducing our open spaces and making our roads increasingly dangerous to ride a bike on, or run alongside. The environmental impact would be devastating. In a week when the world has received its starkest warnings yet about the catastrophic impact of climate change, we should be doing everything in our power to protect green spaces, farmland and environments. Our indigenous wildlife species are already under threat, diminishing in numbers and disappearing rapidly. I realise we are very fortunate to have several excellent country parks on the Wirral which are managed and supported by the Council. These spaces are not only a precious resource for wildlife, but are also precious for current and future generations of Wirral citizens. No less a precious resource however, is the remaining open countryside. The destruction and loss of local habitats incurred through</p>

DOR REF	RESPONSE
	development can only result in the destruction and loss of the wildlife species dependant on that habitat. Once again human behaviour impacting in the most destructive way on our local area, country and planet. I am extremely disappointed the council have had to resort to this measure and will be raising my complaint with my local MP and the minister for Housing and Planning also.
DOR00546	I am writing in regard to the Initial Green Belt Review that is being carried out across Wirral, including the potential Infill Villages being considered in the area along the Dee coast. I am deeply concerned that Green Belt land across the borough is being considered for development of any kind. We need to protect what little Green Belt land we have left for our children and future generations. I have lived in Wirral all my life and in Heswall for over 23 years and have enjoyed the varied wildlife that we see not only in our garden but along the Wirral Way and the fields that surround us. We regularly encounter badgers, foxes, pheasants, barn owls and numerous migrating birds that roost on the Dee estuary (The Dee Estuary has been designated as a Wetland of International Importance under the Ramsar Convention and as a Special Protection Area under the EC Wild Birds Directive (79/409/ECC) and adjoining fields. These pockets of agricultural Green Belt act as wildlife corridors for protected species and as a part of the designated Coastal Zone need to be protected to preserve and enhance the character of our coastline. While I appreciate the need for more social and private housing as put forward in the Government Housing Policy, surely there is plenty of Brown Field land prime for development and other areas requiring regeneration. Living in Lower Heswall I have had first-hand experience with flood and drainage problems, especially when hit by flash flooding whilst living in Gayton Road, the current drainage can't cope which leads to localised flooding, this would only be exacerbated by more housing. There is also a problem with access regarding the Riverbank Road site. Davenport Road which links all the land concerned is a continuation of the Wirral Way and therefore has a large number of cyclists, horse riders, dog walkers and families already using this route. I hope you take these objections on board when making any decisions that will affect the future of all Green Belt land across Wirral.
DOR00547	It also appears that: <ul style="list-style-type: none"> • there is insufficient evidence to support the need for the housing targets that have been placed on the Wirral; and • further use could be made of brownfield sites and Peel's Wirral Waters.
DOR00548	I strongly object to any change of use to this Car Park
DOR00549	<ol style="list-style-type: none"> 1. Local population growth figures do not substantiate the housing targets identified by the Council/DCLG 2. Number of existing empty properties 3. Planning applications that have already been approved but no development has started 4. Planning applications that may be "stuck in the system" 5. Lack of central government funding for infrastructure 6. Land values on Green Belt may not be sufficiently profitable to enable developers to build affordable homes - which means more expensive homes are built instead 7. isolated nature of Green Field sites and access to facilities, e.g. regular public transport, shops, etc. 8. loss of biodiversity and public amenities, e.g. access to natural habitats, woodland, footpaths and bridleways etc. 9. impact on core services; doctors, schools etc. 10. employment opportunities for new neighbourhoods
DOR00550	Why be so quick to give up our green spaces especially concentrating mainly in one side of the peninsula. Wirral is small and needs a proper proportion of countryside. There are brownfield sites which really need developing. It is short sighted to opt for the easiest, quickest and cheapest option.
DOR00551	Please do not destroy ALL our Green Belt areas displaying the beauty of God's creation, making our roads busier, causing congestion and traffic jams and making our schools and surgeries to become overcrowded. Please protect our historic village for our children and succeeding generations. Please stop Eastham becoming a built up area with no pleasant relaxing places. Please preserve our countryside.
DOR00552	Wirral's Green Belt, with its splendid views, walks and recreational areas, and the very distinct identities of its various communities, were key reasons why I and many other residents chose to live on the Peninsula and raise a family. All this is now at risk, unnecessarily so and we need your help to change things around. Its time Wirral Council stopped blaming everyone else and delivered a Local Plan through a process which gives its Residents real participation and reasonable time to determine what is needed and how it should fit in and around THEIR communities. Instead, there is an apparent determination to release Green Belt and reap short term rewards. This was brought home to us recently when a senior Council Officer, calmly announced that developers and the Council see greenfield development as simple, quick and lucrative. This is just NOT acceptable. It is a flawed approach that must change. I understand that independent professionals, with a different objective and approach, have demonstrated there is NO need to release ANY Green Belt land to provide in a timely fashion even the original, inflated 'Housing Need' let alone the much lower requirement in line with the latest official growth forecasts. I and many other Wirral residents therefore demand that the people are heard and that the current process is altered to allow proper involvement of Wirral's Residents, free from the present headlong rush, in order to ensure community identity and our glorious Green belt are retained for the continued delight of Residents and Visitors alike, and more importantly for future generations to enjoy.

DOR REF	RESPONSE
DOR00553	<p>I urge you to note the devastating environmental impact of such a development. This site backs onto an area of SSSI (Dibbinsdale). Many species of animals make their home on the land of Vineyard Farm, for example, bats, red-legged partridge, pheasants, owls and various birds of prey and along with protected species of flora and fauna, they would have their habitat destroyed or potentially contaminated from flood water and sewerage. There is an important need to preserve our good quality agricultural land in order for our area, and the country as a whole, to be able to feed ourselves. Vineyard Farm, and much of the other sites listed in the Local Plan for potential release from greenbelt are high quality agricultural land on which working farms operate. Perhaps most importantly, the area of Spital already has overstretched and struggling infrastructure that cannot cope with the demands of the current residents of this area. All local primary schools are oversubscribed. How are they to cope with a potential hundreds of extra families living in the catchment area? Patients already often struggle to get prompt appointments at the local doctors' surgery and now with the collapse of the local bus service operator, the elderly and vulnerable residents are unable to access alternative medical care (from Medical Centre at the Bebington Civic Centre) or dental care, all of which lay at a great distance from the estates of Spital that exist currently. To further reiterate the problems of transport, the current residents, many of whom are elderly and/or vulnerable on the Poulton Lancelyn estate, are cut off from the public transport network. Spital rail station is inaccessible to those with mobility problems and there is no bus service to connect the estate with the few major bus routes that have remained in this area. It was a very limited and inadequate service anyway prior to the collapse of Avon buses. A large housing estate on the site of Vineyard Farm would also exacerbate the problems of traffic congestion and endanger road users further. Poulton Road is already excessively busy, particularly at peak times, is narrow as it leaves Spital heading towards Dibbinsdale, and the crossroads of Warren Hey/Poulton Royd Drive is an accident hotspot (many of these collisions/near misses will go unreported officially.) Furthermore, Spital crossroads (at the Three Stags) is a major congestion/accident hotspot also, as is J4 of the M53. An extra 1000 cars that a housing estate would create, would lead to more accidents, more injury and gridlock. Lastly, if SP043 is released from greenbelt and built upon, the Council and housebuilders could be irrevocably destroying areas of national historic importance, and evidence of life from the Neolithic, Roman and Viking eras. In conclusion, the release of site SP043 would destroy the character of this area, destroy the habitats of protected and uncommon species of animals and plants and strain the current infrastructure to breaking point. From revised ONS statistics, I urge Wirral Council to review the need to release any greenbelt, and specifically SP043, as there is a dramatic reduction in the need for extra housing estates as the population of the peninsula continues to fall.</p>
DOR00554	<p>We strongly oppose building on Green Belt land. In particular Lever Causeway, Mount Road and Storeton. We feel more effort can be made to use "brownfield sites" for housing development. Birkenhead docks area for example - "Wirral Waters" project.</p>
DOR00555	[SAME AS DOR00455]
DOR00556	[SAME AS DOR00455]
DOR00557	<p>Green Belt for housing ABSOLUTE MADNESS.</p> <p>Any change of use of the Green Belt on Wirral would alter that which makes Wirral special and unequal to most areas of England. The government are opposed to unnecessary use of the Green Belt as per statements by the Prime Minister and Chancellor in the areas adjacent to us SPO19-20-10-11. These areas are one and should be classed as rural. Therefore the application by Levers Estate to split SPO19 should not apply. The NATIONAL PLANNING POLICY FRAME WORK states that all problems ref schools, health etc. must be resolved before applications are submitted has this been done? Schools and health services affected by proposed area 1952(522 houses) are well over subscribed, Let alone a further 1000 extra pupils or 2000 patients, roads could not cope with another 750 cars. And so the list goes on in the recipe for chaos. Properties in the area 1952 have been purchased because of the Green Belt, many have altered their homes adding large extensions or loft conversions. If building was to proceed house prices would fall and could put many in negative equity. As we are at the end of PARKWAY AREA 1952 our drains are the shallowest with the invert level at 900mm before entering the main drain. Then there is a drop of 610mm into area 1952 and the land falls away further. This makes drainage impossible without replacing main sewers and or building up the land. This area 1952 also has the WESTERN LINK cable laid through it and any change of use would have to be agreed with the NATIONAL GRID. The council appears to be at odds with many parties opposed to the Green Belt and also the methods of calculating housing needs. We the general public need statements to clarify this. The Labour leader of the council issued a letter to all residents with comments about PEEL HOLDINGS. They rebuked the comments and made mockery of the councils statements. The council after 2 weeks have not contested this letter. WHO DO WE BELIEVE? SKY TV in their Line 18 investigation into the housing problems using a distinguished company, found that Wirral was not in need of housing other than that which could be provided by Brownfield sites. Rating Wirral 351 out of 390 councils (most in need starts at 1) for lack of supply. On reading letters and plans by all parties it would appear that the council has been lacking in producing a plan and is now rushing to meet the Governments dead line. We appreciate that by law the council do have to review Green Field sites, but they do not have to use them. Above all from all parties involved please let the public have honesty not politics, and for councillors of all parties to remember that the Green Belt is for the people and not a tool for gaining political points</p>
DOR00558	<p>Re: Proposed Green Belt - Sites ref number SPO49 South of Mill Park, Eastham Wirral Council state that building in the green belt can cause property to creep and join up towns and cities. If the Council look at green belt sites that are locked by buildings and motorways, where is the creep? Moreover it costs less, building in bulk on one large site, rather than lots of small parcels spread throughout the borough. The borough would benefit more so, as it would be much cleaner and less pressure on the environment after completion, with motorways and large A road's on the doorstep. This alone stops the build-up of traffic in the already congested narrow streets causing more pollution. The council should be creating green space in the already built up areas of the borough so the elector living there could enjoy, rather than wrapping them in more concrete, they would have far less depression and less pressure on the NHS. According to the world scientist, if governments won't change their ways in the next ten years we are in trouble and that is proven in the last three years with loss of life around the world for example, with flooding and storms. These factors would ensure a better and longer quality of life. So, on that note I would strongly recommend for the Council to be in favour of building on large sites.</p>

DOR REF	RESPONSE
DOR00559	Frequently fully utilised amenity essential to access services in Bromborough Village. There is very little alternative off-street parking in Bromborough. Narrow streets also severely limit on-street parking. Parking for the disabled would also be severely limited. WBC would be discriminating against rate-paying businesses competing with surrounding centres of Eastham, Lower Bebington, Higher Bebington & New Ferry all having local authority car parks which are not as fully utilised as Bromborough. This discrimination would also apply to local rate-paying residents. Bromborough village has contributed its fair share to WBC/Govt building targets already with the massive Acre Lane housing development, redevelopment of the Archers pub, and houses backing onto St Barnabas. The massive Acre Lane development will add to the need for all of the facilities Bromborough has to offer. The Octel Club site is another massive site nearby that is likely to be developed in the near future. The number of empty shop units and charity shops currently shows that there is no demand for additional shops units. Lack of parking facilities will force further closures even risking closure of the health centre creating a severe shortage of medical facilities. Govt priority is for redevelopment of brownfield sites such as the large redundant industrial site adjacent to housing in Dock Road North, and recently demolished site North of Bebington Library /health centre. There are also vacant fields opposite the library, opposite the Archers pub site, & adjacent to Woodslea School all preferable to vandalising existing utilised local amenities.
DOR00560	<p>1.) There is sufficient land in urban areas to build upon.</p> <p>2.) The population projection does not warrant for 12,000 houses.</p> <p>3.) It will spoil the character of the area.</p> <p>4.) Lever Causeway and its open spaces provide an area for relaxation and exercise for innumerable local residents as well as wildlife.</p> <p>5.) Unrivalled views will be destroyed, irreparable damage to its setting.</p> <p>6.) Increased traffic and major congestion.</p> <p>7.) Acres of prime agricultural land will be lost.</p> <p>8.) Damage to Mountwood Conservation area.</p> <p>9.) The sites either side of Lever Causeway are huge. Once released from Green Belt, building could extend to Storeton, causing unrestricted sprawl, with historic Storeton and Bebington Merging.</p> <p>10.) Use the Wirral's already empty 5,000 properties and the already existing space on brownfield sites for 18000 homes.</p> <p>11) It will drive the house price of existing houses down</p> <p>12) What attracts people to the Wirral is the countryside, if we lose them what is attracting people to live here instead of neighbouring boroughs like Liverpool?</p> <p>13) The roads and public transport in the area are not suitable to support 18000 houses</p> <p>14) We'll have to drive to find countryside which will cause more pollution</p> <p>15) Why would someone buy a house here when our town centre is continuing to be driven into the ground. What is going to attract people to the Wirral if we lose everything that makes us unique.</p>
DOR00561	<p>I have just been made aware of Wirral council's proposal to build on Eastham's greenbelt land. I am absolutely outraged and disgusted - how dare you put forward plans to build on our green spaces!</p> <p>Do Wirral council hate Eastham, because it's one hit after another at the moment - you want to close the Walk-in centre, you want to get rid of the library/civic centre and build on there, and now you want to build on our green belt!</p> <p>Leave Eastham alone, and leave our lovely green belt alone. You have no clue about our community!</p> <p>We do not want our green belt built on - we do not want more traffic and pollution, we do not want overcrowded schools, GP's and other services, we don't want to live in a built up area with no green space, we do not want our trees removed to be replaced by bricks and concrete!</p> <p>If you want to build on green belt, do it on your own green belt, where you live- see how much you would be against that!</p> <p>The council needs to get in touch with reality - if you are so concerned with saving money, I suggest some of your over-paid managers take a pay cut!</p> <p>Leave our green belt alone, you out of touch, ignorant, money wasting, useless, penny-pinching bunch of worse-than-useless morons!</p>
DOR00562	<p>I object to the Wirral Council plans to use greenbelt land to build dwellings. I agree to the arguments that have been cited by [Another respondent] of Spital. Use of greenbelt land will result in more congested roads, poorer air quality, reduced open spaces, oversubscribed local services and create urbanisation harmful to mental and physical health.</p> <p>On a point of law the figures originally specified for the required new build of dwellings have been changed and I/we consider this has fatally flawed the required public consultation/engagement and confused many Wirral Citizens. Also if Peel were to use Wirral Waters to the full to build dwellings, as apparently originally promised when granted planning permission, this would negate the need to build on Wirral greenbelt. What is being done about this issue?</p>
DOR00563	[SAME AS DOR00455]

DOR REF	RESPONSE
DOR00564	<p>My concerns around the housing proposals for these areas are truly justified and as you are aware would impact of the roads in this area, leading to an increase in volume of traffic and further congestion and pollution on our roads. Building more homes will have significant and irreversible costs to not only the local environment , the traffic congestion and health issues due to the air pollution as the average household owns two cars. In addition the existing schools in these areas will be even more oversubscribed than they already are. This will have such a negative impact, not only on the social changes but as mentioned previously our local environment. Existing train stations do not have sufficient car parking as it is, so this will push more cars to park and obstruct neighbouring streets and small cul-de-sacs/closes around the stations as they struggle to cope with the new additional volume of people who will be using trains daily. There will not be more buses put on to cope with the volume of additional people having to travel from these areas, just an awful situation created by the council where the daily commute will become unbearable for many people. There are many Brownfield sites that Wirral Borough Council could consider and why we have to destroy the precious and open Greenfield sites that exist which host a wealth of nature and areas for families to enjoy defies belief. Once these areas are destroyed there is no going back. I believe it is absolutely criminal that this is being proposed without any considerations and my fear is these proposals will just be "bulldozed" through by Wirral Borough Council disregarding the genuine concerns that have been raised by residents such as myself and my family who live here. It will be the people who will be impacted and suffer at the cost of the initial short term gain to achieve proposed targets for new home builds. The government will just deem this as an "exercise tick" in the box without consideration for the permanent deterioration in the lifestyle of the residents who live in these areas. Where will children and families have as recreational areas if Wirral Council insist on building on so much of the Green belt area? It is an irreversible decision which will impact on generations of those who live here and will change the face of East Wirral into a heavily overpopulated, built up area, where green belt space will now only be for the privileged few who afford to live on those areas of Wirral which have not had their green belt built on. I would implore you to support the challenge that I am aware myself, my family and other residents would ask of you in this "threat" to the habitat of the nature of building on Greenfield sites, causing huge increase in traffic congestion, transport and oversubscribed schools in Spital.</p>
DOR00565	<p>I would like to make you and your planning office aware of my disbelief that the council would even consider building on our busy car park in Bromborough. The majority of the day this car park is full with lots of movement as people are in and out of our village shopping area or going to activities on a weekly and daily basis in the area. As a local resident I was part of a group who fought 10 years ago to get restricted parking back onto the village high street which has made this village more vibrant with a very good footfall. Now you want to build houses on the car park and kill the village. I cannot believe that our council is stupid enough to do this or is it just scaremongering ?</p> <p>We have fought long and hard to keep this village alive which is not an easy job as we have the Croft estate within easy reach BUT we are still alive and kicking with new businesses starting up as we speak – and you want to destroy that. Please tell me that someone is going to do something sensible and take our car park and our Civic centre and library off this ridiculous list.</p>
DOR00566	No to the destruction of the Green Belt area of Lever Causeway, Mountwood & Bebington.
DOR00567	<p>Why would the council wish to ruin high quality farming land? We need to be protecting agricultural land not selling it off to the highest bidder, surely we will need to keep this land post Brexit as will be required to be self-sufficient. If these plans go ahead Wirral will be an area without farmland. The site at SP042 is likely to have remains of national historic importance, which would be lost forever to future generations. If I am to understand that national Greenbelt policy is to prevent urban sprawl and encroachment into the country-side and preserve the special character and setting of historic towns and villages, why isn't this criteria being used in this case? The building of houses on this proposed site will bring chaos to the heavily congested roads in the Spital area and the M53 junction 4. Local schools are already oversubscribed, the local Doctors surgeries are busy, walk-in centres are to be closed, and Arrowe Park Hospital will be overwhelmed. I also am led to believe that the number of houses that need to be built has been reduced and that The environmental impact on this area would be massive, as well as the huge impact developments would have on the residents who live nearby. Roads are already busy especially during mornings and evenings without the addition of so many more cars. The removal of farmland that is in use for building on is ridiculous. there is enough brown field sites available for the local plan.</p>
DOR00568	<p>I'm writing today to emphatically object to the proposed and completely unnecessary development of greenbelt land. According to WBC Cabinet Meeting 23rd July 2018: "Housing Land outside the greenbelt to be capable of providing 7635 dwellings." Wirral's house building requirement has been reduced to 5925 houses, and the existing House building projects including Peel Group's Wirral Waters projects delivery of 6450 homes over 15 years and ultimately 13 000 dwellings. There is no need to release any greenbelt.</p> <p>Wirral has more than enough homes currently empty and enough brownfield sites to account for the realistic growth of the area. Combining villages like Irby, Thingwall and Pensby is reprehensible and will permanently destroy a community based heritage that has been developed over thousands of years. The schools in the areas are unable to meet the increased number of children should the greenbelt here be released. Places such as Wallasey and Birkenhead should see investment in housing as well as services to regenerate communities that have been left to fail. The birth rate is falling. Real and current figures must be used, and releasing greenbelt will result in an irreversible ecological depletion which will in turn hurt the health of Wirral residents. Do not release greenbelt. Not because the voting public would never forgive WBC, but because it is the scientifically, economically, legally, and ethically right thing to protect</p>
DOR00569	<p>As a Thingwall resident I have significant concerns of the following and the impact it will have on Wirral:</p> <ul style="list-style-type: none"> - Wirral losing its unique character of the semi-rural feeling. - increased pressure on roads (particularly west Wirral) - increased pressure on local schools

DOR REF	RESPONSE
	<ul style="list-style-type: none"> - increased pressure on local health services - impact on current property prices. With the simple demand and supply theory, how will this affect the value of my property? - who are the proposed homes aimed at? With work already being difficult for many Wirral residents to find, and having to commute to Liverpool/Chester/Manchester, an influx of new residents from other areas will inevitably increase competition for employment/make the motorways even busier. - negative impact on local wild life. - farm land being sold, once again, means the UK will be producing less. - an overall impact on air pollution for asthma sufferers due to the decrease in green belt/trees and increase in traffic and home emissions. <p>To reiterate, I strongly object to proposed plans to build on the green belt, particularly when there are many appropriate brown sites across Wirral and Wirral Water ways is proposed.</p>
DOR00570	<p>I recently attended a really good local planning meeting in Bebington. My understanding of that meeting was as follows: You have to find an enclosed area that covers 22% of the Wirral Greenbelt area. You have chosen an area on the east side of Wirral that includes Storeton Woods, Lever Causeway, Mountwood and Bebington. Your reasons for choosing this area is because 9% of this area is either a conservation area or areas of SSSI. Areas which you have no intention of ever building on. The reason you have chosen this particular 22% of Greenbelt is because only 13% of the 22% will be eligible to be built on. The other 9% although out of Greenbelt protection will be safeguarded by other methods in perpetuity for the community. I have recently received a letter which from a conservation group which seems to indicate that you are no longer planning to carry out the above.</p>
DOR00571	<p>We are absolutely against the plan to destroy Bromborough Civic Centre. Local residents use this centre every day and it would destroy the heart of the village. I am a member of U3A, Wirral RSPB and the library which all take place here. For many older people the loss of the Centre would make them lonely and depressed. Surely Wirral Council could not think of destroying the heart of historic Bromborough. If this plan goes ahead I can assure you that most Bromborough residents will never vote a Labour council in again. Every person we have spoken to re above cannot believe that you could even consider destroying the heart and soul of Bromborough Village. So many clubs and organisations and classes use the Centre. Pensioners especially would be left lonely and unable to get to meet other people. We attend U3A, RSPB bird club, games and the library. The shops, banks and supermarket would have to close with no carpark. We beg you not to go ahead with the proposal.</p>
DOR00572	<p>I wish to raise my objections to the potential building of houses on the farmland adjacent to Thingwall Road, Irby. Specifically the farmland between Glenwood Road and Parkway.</p> <ol style="list-style-type: none"> 1. - Building on this land will significantly spoil the character of the village. 2. - Extra houses will add significant traffic to an already busy road. 3. - The local doctors' surgery could not cope with over 1000 new patients. Local schools could not cope with the additional requests for places. 4. - The views from Thingwall Road are unrivalled. Houses on this farmland would remove this beautiful setting forever. 5. - This land is FARMLAND. We need to maintain the limited farmland that we have. We cannot rely on importing food crops. Acres of FARMLAND will be lost forever. 6. - The removal of this FARMLAND will affect the jobs of the farmer and his farm-hands. 7. - There are enough brownfield sites on Wirral to accommodate any housing requirements without using up valuable Green Belt. 8. - Wirral has approximately 5000 houses standing empty. These should be put into use. 9. - The council should have a policy of "Brownfield First".
DOR00573	<p>Wirral Council are compounding their failure to produce a 'Local Plan' with a rushed and flawed Review and Public Consultation. Their actions do not match their words about protecting our beautiful Green Belt on which the attraction and tourism of Wirral depend. On the contrary, the Council are still determined to release Green Belt for development even in the wake of much lower growth forecast from national and local sources. The high 'Housing Need' figure for Wirral, blamed by the Council on Government, was clearly based upon the Council's own inflated growth assumptions and used to justify saying Wirral's 'Housing Need' could not be met without building on Green Belt. However, independent professional research had concluded even that former high figure was deliverable with NIL release of Green Belt. The new lower Growth Forecasts should make this easier to achieve which is the expressed wish of residents. Wirral has vast untapped amounts of buildings and land outside of Green Belt to supply sufficient housing of all types throughout the Local Plan Period and beyond. To start with, Peel Holdings have confirmed up to 6,450 units can be delivered at 'Wirral Waters'. Yet, despite Officers confirming Phase One is "fully viable" due in part to a £6m Government Grant and New Homes monies, the Council have not included a single new dwelling in its First or even Second 5-Year Period and just 1,100 homes after 15 years. This is unacceptable. There are also thousands of brown field sites and approved schemes, 16,000 existing planning consents and up to 6,000 empty houses to be brought back into use, plus opportunities for significant conversions, normal applications and 'Windfall' supply and more. Sadly, little is being made of this, whilst Officers appear happy to state that developers and the Council see greenfield development as simple, quick and lucrative. All this when your predecessor wrote to the Council saying, "This is not an area of high housing pressure." Not only am I protesting about the completely unnecessary loss of Green Belt land but also the lack of time being afforded the public to engage properly in the process of deciding what is really needed and where, having due regard to all factors including support infrastructure and already stretched public services and facilities. I appeal to you to use your influence to stop the current plan and allow for a new process, still led on Wirral but with sufficient time to properly involve willing residents, believing this would deliver a more robust Local Plan in a shorter overall time.</p>

DOR REF	RESPONSE
DOR00574	<p>I am writing to add my support to the petition objecting against building on land adjacent to Lever causeway, between Storeton and Bebington.</p> <p>I grew up in Storeton, and my parents continue to live there. I cannot think of anyone on the Wirral who would want this project to go ahead- it is a beautiful part of the Wirral, steeped in history and providing an escape for those seeking to keep fit and escape busy every day life. Why would we build new houses here- one road in and out, no shops or other amenities to support such a population surge. Why build here, when 5000 houses remain unoccupied on the Peninsula, in need of refurbishment.</p> <p>Why build here on beautiful green open land, when brownfield sites exist across the Wirral.</p>
DOR00575	<p>Paragraph 137 of the NPPF states that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. The authority will find themselves open to a legal challenge if the brownfield register is not comprehensive and up to date as the correct process will not have been followed and the process will be flawed. Paragraph 85 of the NPPF says that planning policies should recognise that residential development plays an important role in ensuring the vitality of town centres and should encourage residential development on appropriate sites. More emphasis should be placed on regenerating the run down areas of the Borough rather than building on green fields. The Wirral Growth Company is embarking on a regeneration scheme. This scheme will spread across 32 sites in Moreton, Wallasey, Bebington, Bromborough and Birkenhead. However, it will only include 262 new homes. This is a wasted opportunity. Sites SP030 and SP033 are areas being considered for release from the Green Belt. They are large areas, which if released, will have no protection from development. Urban sprawl will take place. This would violate the first test of Green Belt and also the third test which is to safeguard the countryside from encroachment. I am horrified to see that the site SP030 has an allocation of up to 1,467 houses which is totally unacceptable.</p>
DOR00575	<p>Although it is said that other protections will be in place to stop development, there is no guarantee of this in the future, should the site be removed from the Green Belt's protection. SP030 is an area which is currently farmed, producing crops annually. Lever Causeway, with its green spaces, currently provides an area where people can walk, cycle, jog and ride. It is used by many people from different areas of the borough. Paragraph 91 of the NPPF says that, "Planning policies and decisions should aim to achieve healthy, inclusive and safe places which;c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure.....and layouts that encourage walking and cycling. The areas each side of Lever Causeway also fit the criteria of Local Green Space as per paragraph 100 of the NPPF as they are demonstrably special to the local community, because of their beauty, historic significance (Lord Leverhulme built the road in 1912) recreational value, tranquillity and richness of wildlife in the surrounding fields. Paragraphs 96 to 101 also cover the importance of green spaces for public wellbeing. As sites SP030, SP033 and SP035 are already Green Belt, they should not be removed as they are already providing the amenities that Local Green Spaces provide. Mount Road in Bebington is situated on a ridge. Because of this, any building on Mount Road down Lever Causeway will have a disproportionate effect on the rest of the area. The development will be highly visible to any remaining Green Belt and any views will be lost.</p>
DOR00576	<ol style="list-style-type: none"> 1.) There is sufficient land in urban areas to build upon. 2.) The population projection does not warrant for 12,000 houses. Sajid Javid has stated the Wirral is not an area of housing concern 3.) It will spoil the character of the area. 4.) Lever Causeway and its open spaces provide an area for relaxation and exercise for innumerable local residents as well as wildlife. 5.) Unrivalled views will be destroyed, irreparable damage to its setting. 6.) Increased traffic and major congestion. 7.) Acres of prime agricultural land will be lost. 8.) Damage to Mountwood Conservation area. 9.) The sites either side of Lever Causeway are huge. Once released from Green Belt, building could extend to Storeton, causing unrestricted sprawl, with historic Storeton and Bebington Merging. 10.) Use the Wirral's already empty 5,000 properties and the already existing space on brownfield sites for 18000 homes. 11.) As Wirral's population actually appears to be decreasing, one would argue housing is not needed. Roughly only 25% of new builds are classed as 'affordable', 4 bedroom homes in the countryside are not needed. 12.) following the cessation of Avon Buses, the only form of public transport to Storeton Village has been withdrawn. How will more homes ease the pressure? 13.) The green belt land surrounding Storeton and Hancock's wood provides assess for wildlife for adjacent areas of woodland, which means these areas act as biological corridors, if you will. 14.) Building on point 12, as there is now no public transport available, and the vast majority of homes built will be unaffordable to the majority of potential residents, this would mean the majority of said potential residents will use cars to commute, further increasing air pollution. 15.) the only potential reason I see for the council in authorising building on this site is to raise income. This is morally questionable and would cause an outpouring of grief, anger and mistrust of yourselves from the perspectives of local residents.
DOR00577	<p>I am sending this email today to the council to inform that I object to the open spaces in Eastham being used for housing and industry development.</p> <p>I have been a resident of Eastham for the past 24years. My children have grown up surrounded by areas to play freely and feel safe. My Grandchildren are now experiencing the same childhood, and</p>

DOR REF	RESPONSE
	<p>as family we continue to enjoy the green areas within our community. Once these areas are developed we will never get them back and as a community and we will inherit a multitude of other issues. If the younger and current generation do not have the opportunity and availability of open spaces on their doorstep, we will see an increase in mental health, and physical health issues, our schools and health services will become even more overwhelmed.</p> <p>I feel very strongly that these areas should continue to be available to the community and visitors and object to any development.</p>
DOR00578	<p>I would like to object to the Wirral council's plans for eventual use of our lovely greenbelt land for building houses on it. Are there not empty properties enough throughout the Wirral borough that could be filled first, before you start expanding the building of new houses, on green field sites. Go take a look at Bromborough Pool, it looks a mess, the old factory looked better. Whoever the planner was, he obviously did not take into consideration the future in this old area. As for building houses on existing carparks throughout the borough, these small village communities rely on people parking and shopping in these areas, there custom keeps shops open and people working. If this council gets its way with these plans, then it will be the end of the independent shop keeper as we know them today.</p>
DOR00579	[SAME AS DOR00455]
DOR00580	<p>I am horrified to hear that Wirral Council is considering eating into our wonderful green belt land on this peninsular which is one of the pearls of North West England. Why do you think people come to live on the Wirral? It is because we have beautiful countryside on our doorsteps and don't want to live in an urban environment. I live on the edge of Prenton (not the postal Prenton area, but the real Prenton) and chose this house because it was between town and country. To bite into the green belt for housing all the way to the M53 Motorway is immediately ruining the locality and turning Prenton into an urban sprawl. I understand that there are still a number of brownfield sites in Birkenhead that would provide enough land for the required housing - why is this not being used? Why aren't Peel Holdings being forced to build more rapidly, or even have the land compulsorily purchased so that other builders can use their land? Prenton is already being "filled in" with additional housing in the new "Glenavon Park". What a farce that name is - houses are being squashed into that space off Glenavon Road with not even enough room between the houses to erect a ladder - the gardens are TINY and it should be renamed "Glenavon Car Park"! That's what the locals call it already! Please would you tell me who all these 12,000 people are who are wanting to buy what will be expensive houses on the outskirts of Prenton. I simply don't believe these purchasers exist or that the houses are needed. As for turning Lever Causeway into an urban environment - Lord Leverhulme must be turning in his grave. For people coming out of Birkenhead it is the point at which you can suddenly go "Aah". You are immediately plunged into beautiful countryside with a magnificent avenue of trees and lovely spacious walking/riding/cycling paths are available, with of course glorious views of the Welsh hills. Storeton/Mount Road is a busy enough road already at rush hour, morning and evening, so the very idea of putting a housing estate there is, in my estimation, completely bonkers. It will be complete gridlock with no-one being able either to get out of or into Birkenhead and to and from the Motorway. I am now feeling concerned for the welfare of the people living in Storeton village who went there for peace and quiet - no longer if you have your way. AND, where will children go to school? Which hospital/doctors will people use? At present we are FULL UP in all respects as far as local services are concerned.</p>
DOR00581	<p>I am writing to lodge my objections to the Local Plan, and more specifically to the site of SP043 (Vineyard Farm and the land east of Poulton Road, Spital). This area should not be released from greenbelt for housing development. I urge you to note the devastating environmental impact of such a development. This site backs onto an area of SSSI (Dibbinsdale). Many species of uncommon animals make their home on the land of Vineyard Farm, for example, bats, red-legged partridge, pheasants, owls and various birds of prey and along with protected species of flora and fauna, they would have their habitat destroyed or potentially contaminated from flood water and sewerage. Secondly, there is an important need to preserve our good quality agricultural land in order for our area, and the country as a whole, to be able to feed ourselves. Vineyard Farm, and much of the other sites listed in the Local Plan for potential release from greenbelt are high quality agricultural land on which working farms operate. Thirdly, the area of Spital already has overstretched and struggling infrastructure that cannot cope with the demands of the current residents of this area. All local primary schools are oversubscribed. How are they to cope with hundreds more families living in the catchment area? Patients already often struggle to get prompt appointments at the local doctors' surgery and now with the collapse of the local bus service operator, the elderly and vulnerable residents are unable to access alternative medical care (from Medical Centre at the Bebington Civic Centre) or dental care, all of which lay at a great distance from the estates of Spital that exist currently. To further reiterate the problems of transport, the current residents, many of whom are elderly and/or vulnerable on the Poulton Lancelyn estate, are cut off from the public transport network. Spital rail station is inaccessible to those with mobility problems and there is no bus service to connect the estate with the few major bus routes that have remained in this area. It was a very limited and inadequate service anyway prior to the collapse of Avon buses. A large housing estate on the site of Vineyard Farm would also exacerbate the problems of traffic congestion and endanger road users further. Poulton Road is already excessively busy, particularly at peak times, is narrow as it leaves Spital heading towards Dibbinsdale, and the crossroads of Warren Hey/Poulton Royd Drive is an accident hotspot (many of these collisions/near misses will go unreported officially.) Furthermore, Spital crossroads (at the Three Stags) is a major congestion/accident hotspot also, as is J4 of the M53. An extra 1000 cars that a housing estate would create, would lead to more accidents, more injury and gridlock. Lastly, if SP043 is released from greenbelt and built upon, the Council and housebuilders could be irrevocably destroying areas of national historic importance, being potentially the site of the Battle of Brunanburgh as well as evidence of life from the Neolithic, Roman and Viking eras. In conclusion, the release of site SP043 would destroy the character of this area, destroy the habitats of protected and uncommon species of animals and plants and strain the current infrastructure to breaking point. From revised ONS statistics, I urge Wirral Council to review the need to release any greenbelt, and specifically SP043, as there is a dramatic reduction in the need for extra housing estates as the population of the peninsula continues to fall.</p>

DOR REF	RESPONSE
DOR00582	The plans for Lever Causeway are terrible & should be scrapped immediately. There are sufficient brown field sites to utilise. The infrastructure is not there. There is no evidence housing on this scale is required. STOP THIS IMMEDIATELY
DOR00583	I live in Thornton Hough, and very much appreciate its special characteristics as a village that combines architectural beauty, natural beauty, a great sense of community, and a special heritage that makes it a famous site, known to many people in and beyond Wirral. I recognise that there is a need for new housing, and that not all owners of brown field land are willing to release it and actively fund redevelopment. However, given that the recent ONS report has downgraded the likely new housing requirement for Wirral, I would expect the local plan to be prepared on the basis of these more recent and realistic estimates. Therefore, I do not think there should be redraw the boundaries of the current green belt protection in Wirral. With particular reference to Thornton Hough, the area that the consultation suggests may be appropriate for development is adjacent to the small and well established Oxford Road estate. This estate is bounded on three sides by agricultural land and on the fourth side by the main road, so any attempt to build there would be bound to encroach on land with special value. The village as a whole is small and not well served by public transport. It is also vital that the village retains its special sense in our North West social and industrial history. At the moment it is impossible to miss its connection to Port Sunlight and the Lever legacy, something that we should not compromise with further building. Wirral Waters, brownfield development, and the reclaiming for habitation of the 6,000 empty units in Wirral, should more than accommodate all the requirements for building over the 15 year period. Given that Thornton Hough is not only green belt but is also conservation land, it should be the last priority for any population growth based needs assessment for additional housing. Given the ONS downgrade of new home needs in its recent report, this should mean that there is absolutely no need to build here at any scale throughout the duration of the ONS review period.
DOR00584	Absolutely and whole heartedly against any land-grab and desecration to our green belt in the strongest terms. We should be increasing green belt no reducing it. More brown field sites should be used more than documented, homes left vacant c. 4000 of them, reintroduced of high rise tower blocks, and unused shops or areas meant for industry/retail. No more supermarket built. While looking through the consultation I note environmental impact which in its self should halt this process I see no mention of the impact of mental health.
DOR00585	<p>1. Wirral's green belt has existed for 35 years. Once you start allowing development of this precious land, it will be a freefall for further chopping and development in years to come. My worry is that in another 35 years Wirral's green belt will be gone. Forever.</p> <p>2. There are many reasons why residents call Wirral their home. As a very commutable place people choose to live on the Wirral for access to work in and around the region. However, a more important reason for residents choosing to live here is the access to green space, many times on our door step. Wirral is great for runners, cyclists and dog walkers alike and the offer of trails and parks make it an attractive place to live compared to life in a big city close by. We need to keep Wirral green with these opportunities for everyone who has chosen to live here.</p> <p>3. We need to be very careful with the number of houses required for the future.</p> <p>There are many contradicting reports out at the moment that calculate the future housing needs in different ways and with different outcomes. What they all have in common is that no Wirral green belt is required for development in the next 15 years.</p> <p>With the uncertainty of Brexit, we should be extra cautious developing. It only takes the likes of Airbus, Vauxhall and/or Jaguar Landrover - that have already warned of dire consequences of Brexit – to close down and we would suddenly have a surplus of Wirral homes on the market.</p> <p>4. I am aware that you have followed 'guidelines' when deciding what green belt land to consider for development. What I don't agree with is how the majority of this land falls in the pocket east of the M53 and around Bebington. Since Bebington or postcode CH63 was voted the best postcode to live in a few years ago, I can't help but think that your decision is massively driven by developers wanting a slice of this area. This simply isn't fair.</p> <p>Having lived in both Australia and New Zealand where new housing estates were built consistently and at a fast pace, I am well aware of the consequences this have on local communities. The council or equivalent of responsible authorities never have the required funds to extend roads, build new intersections, bridges etc until projects are well finished. By the time there is money many more developments have been built and for commuters the journey to work has more than doubled. Not to mention the chaos and havoc the actual road works cause while they are undertaken. Wirral Council is already struggling financially with local projects and keeping up maintenance of local roads. Warren Hey for example, only had its bitumen resurfaced this week after years and years of potholes. Already there is a lack of car park space and playgrounds for children. Around our schools at drop off and pick up times, parents have to park dangerously because of lack of space. I would not like to imagine what our community would be like with more households and cars on the roads.</p> <p>I live on the Poulton Lancelyn estate. As an active person walking the dog, running and taking my children out on a daily basis, I already find it difficult to cross Poulton Rd and Spital Rd as is. These roads simply can't cope with more traffic. Many cars already drive over the speed limit and make it hazardous for pedestrians to cross. Bearing in mind that many children walk to school on their own (to local secondary schools), this is scary to say the least. Developing new estates on this prime land of green belt would likely attract premium homes well above the median house price for our area. Owners of these homes are more likely to use their own transport to and from work rather than public transport. In addition, children stay living at home longer and in many cases one household have four or five cars parked on or near their driveway. According to conservationists the UK is facing an 'ecological apocalypse' as native species go extinct. The number of hedgehogs for example have dropped from 30 million in the 1950s to only 1.5 million in 1995. We need to keep our green belt to make sure this decline does not continue. With Peel Developers now being backed by the council, my view is that the effort of creating more housing on the Wirral should be focused on Wirral Waters, refurbishing currently empty properties, developing of brown belt sites and also revamping suburbs like New Ferry that might have less of an appeal to live in at the moment. Let's focus on achievable targets with a green footprint and keep our green belt green!</p>

DOR REF	RESPONSE
DOR00586	<p>I also appreciate that the figures quoted are prescribed by central government and that according to the ONS it is unlikely that the number of new homes needed in Wirral will be as high as forecast by the government. I also realise that some of the green belt areas apparently taken into consideration for development are very unlikely to be built on for reasons of suitability, landlord consent, environmental considerations, etc. Having said that, I am extremely concerned about any kind of development on green belt land despite not being affected directly in terms of where I live. Encroaching on green belt land by infill developments between villages, or motorway and villages, is just the thin end of a potentially large wedge. Such developments would irretrievably alter the character of, for example, the areas around Lever Causeway, Landican, Storeton (the same applies to areas across the Wirral that I am less familiar with). The footpaths and lanes in such areas are enjoyed not just by those whose homes border on the green belt, but by people across the Wirral who appreciate the escape from their suburban estates. You single out certain areas for protection from development. I firmly believe that such protected areas would lose most of their value both from an environmental point of view and as areas for recreation. Environmentally, such protected area will effectively be worthless. They will be isolated islands in a sea of developments and any wildlife will not be able to move around as they need to in order to maintain viable populations. Areas like Storeton Woods (again, just an example) will be reduced to suburban parks. As recreational facilities small islands of areas left in a more natural state are often devalued by local residents using them as dumping grounds (local examples include the little stretch of woodland by the Abbot estate in Bebington, the Butterfly Park in New Ferry where volunteers from the Wirral Wildlife Trust have to clear up rubbish dumped over the fences of adjacent homes, and cycle ways in Wirral and Cheshire with the same problem). And merely preserving public rights of way through new suburbia is no substitute for countryside footpaths. Brownfield sites should be used first wherever possible. There is, of course, the problem of cleaning up these sites and providing service installations. This is difficult and expensive, especially when the 'polluter pays' principle can no longer be applied because the polluter has long since left. Councils across the country should lean on government for financial support and a strategy to tackle this problem. So while I realise the higher costs in redeveloping such sites in the short term I believe that in the long term redevelopment of brownfield sites is more sustainable in a number of ways. If we continue to build new homes on greenfield land we end up with suburban sprawl interspersed with abandoned polluted industrial sites, or, at best, new industrial sites, without centres or any form of coherence while Birkenhead as an administrative and commercial centre is left to die. This in turn makes it more difficult to provide urban infrastructure, such as an efficient public transport system or local facilities that can be reached on foot or by bicycle; car use increases further with associated environmental and health problems. Of course, private developers prefer to build on greenfield sites as this is easier and cheaper for them; they also prefer to build larger, more expensive homes over affordable and first-time-buyer housing as this is more profitable. Somehow they need to be incentivised to provide more of what is needed (I'm neither a politician nor an economist, so no suggestions here). Nowadays not everyone wants a garden. Increasing housing density by building more townhouses and apartments would help to preserve the green belt. Apartments would need to be suitable for a wider range of occupancy by providing more storage space to make them attractive for anyone with interests beyond urban activities (e.g. basement storage compartments, drying areas for washing, underground parking facilities, etc., as is the case in many continental towns and regions). The consultation meeting at Port Sunlight revealed a perception among residents in the area that most proposed infill sites seem to be to the east of the motorway while the north western part of Wirral looks set to keep its character. These concerns need to be addressed to make sure that no one feels that there are, in fact, two Wirral's. There have been moves to promote Wirral as a tourist destination, and for good reason. One of the attractions is the still extensive green belt, the semi-rural environment, the fact that it is so easy to get out into countryside with many lovely walks within minutes, while being close to exciting city facilities. I should imagine that this is also what attracts a skilled and professional workforce. Nibbling away at the green belt until we've forgotten that there has ever been one will undermine and ultimately destroy this potential. This is not just about quickly building roofs over heads; this is about a longer term strategy and decision about the kind of place we want Wirral to be. For economic, demographic and environmental reasons the green belt needs to be preserved.</p>
DOR00587	<p>I wish to register my strong objection to the Wirral Green Belt allocation for new housing. I particularly object to the use of the land to the west of Barnston Village. Barnston Village is a conservation area and building new houses there will completely destroy the character of the area. Barnston Road, through the village is already very congested at peak times and would be unable to cope with the extra traffic generated by additional housing. There is a footpath across the fields from Whitfield Lane to Barnston Village, which I regularly walk with my dog. Loss of this footpath would be dreadful, especially as, the council propose banning dogs from Whitfield Common. The areas for walking dogs would be greatly reduced. More housing would also have a massive impact on the core services in the area, schools, doctors' surgeries etc. Public transport in this area is very poor at present and would definitely not support an increase in the population. Once houses are built on the Green Belt, it will be lost forever, depriving future generations of our wonderful countryside and increasing the adverse effects on the environment and contributing to global warming. Only last week we were warned that if global warming was not reduced, the Earth would be at risk of droughts, floods, extreme heat and poverty for hundreds of millions of people. I urge you to reconsider building on the Green Belt and to look at empty properties in the borough and existing approved planning applications, where no development has started.</p>
DOR00588	<p>I wish to object most strongly to the above mentioned proposed plan. We need our Library and Civic Centre. It is indeed the centre of Village life and would be sorely missed by all. People come from all over the Wirral to attend meetings and classes etc. I wish to object most strongly to this plan to close the Allport Lane Car Park. If this came about the Village and the small High St of shops would surely die. There is no other legal parking in the Village! I am sure there are lots of other sites in the area that could be used for building houses without us having to lose our very busy car park.</p>

DOR REF	RESPONSE
DOR00589	<p>I am particularly concerned about the land either side of Lever Causeway and from mount Road towards Storeton although my concerns also cover the principle in general. I have attended the meeting at Hulme Hall and followed this up by reading information on the Council website. I love it here and couldn't think of anywhere else I would rather be. As the Royal Mail regularly recognise – CH63 (my post code) is the “most desirable place to live.” But for how much longer? In general, I disagree with the figures for number of houses that the Government have stated need to be built but I am aware that this may have been recognised by Government already. I also feel that inequality is growing in the Wirral, as in the rest of the country. Birkenhead and Wallasey (Seacombe, Leasowe etc.) are suffering from a severe lack of resources while the “leafy suburbs” are growing in wealth. What is really needed is an injection of Government regeneration money to balance out the inequalities. Without this, Wirral will become a divided borough. The Green Belt in Wirral is our “Jewel in the Crown.” It is the USP of the Wirral. If we give it up, like the plans suggest, we will become just another Mersey region without any distinguishing features. I am sure that this helps to bring visitors into the area, along with the money that they spend here. I'm sure the Authority is aware and has the figures to support this. The various areas of Green Belt also provide places for the local residents to walk, run, cycle and spend their leisure time in a way that supports both physical and mental health. This is available for all Wirral residents and the value of this is not measurable. The Green Belt is also invaluable for wildlife. Any reduction in land available will, undoubtedly, impact on this. Firstly, Lever Causeway is iconic and historic. Anyone who lives in this area should know how it was designed for Lever and is intrinsically linked to the history of Lord Lever and Levers estates etc. This would be lost forever. The elevated position of Mount Road provides views across to Wales. Building on this land would spoil the visual impact of these views. The traffic along Mount Road and along Lever Causeway at peak hours is already dead slow and stop. Building in this area will add more traffic to the already congested roads. Similarly, it will impact on the traffic entering and exiting the M53 at Clatterbridge roundabout, again an area already congested at peak times. There is no train line / station in the vicinity. The local Primary schools are full and have already had to build mobile classrooms on their play areas to accommodate current pupil numbers. Where will the extra school places come from? These are the main reasons why I feel strongly that houses should not be built in this area or on the Green Belt at all. The Green Belt is a lung for all of us. If this is taken away we shall all suffocate.</p>
DOR00590	<p>I would like to object about this plan to build houses on this green belt land This is a beautiful green part of the Wirral. Historic values and beautiful recreational area for walkers cyclists and horse-riding</p>
DOR00591	<p>Magenta Living would support the Council's drive to create a positive Local Plan that meets future housing needs for borough. As the largest Registered Provider of Social Housing in Wirral, we are committed to supporting the Council to deliver the homes the borough needs; though in our view it is essential affordable and affordable rented homes form part of any future programmes. From our perspective, the identification of suitable, available and deliverable sites will be imperative to the successful delivery of our affordable homes programme. We would see this including the release of existing public land and also the use of brownfield sites that could be utilised for housing. We would see the adoption of a policy-led and plan-led approach to housing delivery that will promote a sustainable tenure mix that includes Affordable Housing on all identified sites as being essential. Such an approach should provide the opportunity for investment in Affordable Housing on all major residential planning applications in the borough. Even where suitable, available and deliverable sites are identified it can on occasions take years to bring forward for delivery; so the long-term scope of the Local Plan will assist us in creating a pipeline of opportunities that will consistently deliver a sustainable mix of housing schemes over the next decade and beyond. The Local Plan must work to enable both Housing Associations and Developers to bring forward opportunities to deliver the number of new homes the borough needs and for this to support the wider socio-economic needs of the Wirral. Magenta Living are committed to supporting the Council to deliver a pipeline of sustainable, new build residential projects following the implementation of the finally agreed Local Plan.</p>
DOR00592	<p>I am writing to you to add our voices to the Eastham Village Residents. We are appalled by future developments. So much green belt land being used for redevelopments. This is a very small village (beautiful little village) and cannot take such building and, traffic, more people also. People from outside enjoy the woods and scenery but higher population and increased traffic will destroy this. Where will all this end for Eastham village and other small villages. I feel we are being bullied by big business with little foresight for the well-being (psychological and community) of people. I want to add my voice and stop such activities destroying so much beauty and will not allow this to happen without you knowing of my grave concerns.</p>
DOR00593	<p>One of the pleasures of living on Wirral is that one can quickly reach its green centre and small villages from surrounding urban areas . Wirral is a collection of towns and villages If these were to become increasingly linked then we should have an urban sprawl without any real heart or centre such as a city has . Building on Green Belt is an easy and cheaper fix but once such land is gone it's gone forever . I should point out that I live in a totally built up area and so value Green Belt . Reading through the Proposed Green Belt Sites for Further Investigation I see numerous references to protecting various woods , copses ,SSSI's etc. If surrounded by housing these sites would become overused , littered and dog walks , they would have no value to our sadly depleted wildlife which cannot survive in isolated pockets . Many years of work by volunteers would count for nothing if unsympathetic development takes place . I understand that the future housing requirements of Wirral have been imposed by Central Government. (I don't know whether this is due to the Council not coming up with their own more realistic target before Government stepped in .) The Council and the Office for National Statistics seem to agree that the Government figure is unrealistically high . If this be the case then I should hope that the Council will strongly dispute this figure . Also from the public meetings it became clear that Peel Holdings have drastically reduced the number of houses they planned to build which would have made a significant difference to the housing shortage . Again I should hope that the Council will do all they can to get them to change their minds .</p>

DOR REF	RESPONSE
DOR00593	Many of the new build houses today seem to be large 4 or 5 bedroom properties often with two double garages and large grounds. If we have a housing shortage with young people unable to buy their first homes then the priority should be for affordable housing and this should be taken into account when Planning Consent is given. It's clear that today many people don't require a garden and there must be a large demand for apartments. These are easier to fit into infill spaces (of which there are many in Wirral's urban areas) and provide builders with larger profits. Apartments increase the local population density and could provide extra business for some of Wirral's sadly rundown urban shopping centres. On the same subject many of Wirral's urban shopping centres will clearly never revive, New Ferry is a classic example where most of the shopping area is derelict or closed . Surely there must be scope for regeneration by conversion or demolition and rebuild in order to provide accommodation. I am most familiar with Wirral east of the M53 and I feel that building on Green Belt in this area will merely be the thin end of the wedge and that eventually urban sprawl will fill in between existing urban areas and the M53 leaving Storeton Woods isolated and destroying the character of Lever Causeway .The village of Storeton would disappear. Whilst at the Local Plan meeting (Hulme Hall) there seemed to be a feeling in some sections of the audience that there was a danger of two Wirral's being created and that east Wirral was having to absorb more than its fair share of new housing. In conclusion I would hope that the Council will do all in its power to avoid building on Green Belt (which they've done so successfully in the past) as it will change one of the most attractive benefits of living here.
DOR00594	<ol style="list-style-type: none"> 1. Traffic 2. Drainage 3. Barnston Village conservation status 4. Barnston Dale (Prenton Brook)- site of special biological interest 5. Loss of high quality agricultural land 6. Wildlife 7. Whether this amount of housing land is needed within Wirral
DOR00595	The proposed greenbelt boundary correction SP056B (rear gardens 19 to 29 Croft Drive East) is supported. However it should be extended to also include the rear garden to 15 / 17 Croft Drive East to better match the existing situation on the ground. Should you require any more detail to substantiate this comment then please let me know [Call for Site Application received -Land to East of Croft Drive East]
DOR00596	Please note my objection. The green belt is such a precious resource it should only be built on as the very last option.
DOR00597	I write to strongly object to the proposed development at Storeton Hall Farm and the new housing. This would be a travesty for the area. There are brownfield sites available and over 5000 empty properties on the Wirral. Plus Storeton, as a peaceful, historic community, has no infrastructure (no shops, GP surgery, school, etc.) to support such a development. Children would need to be driven to schools across a busy main road. Traffic and pollution would increase. The Wirral has had a broad strip of Green Belt along the centre of the Peninsula since Green Belt was introduced. It is part of our uniqueness as an area, giving everyone from all backgrounds access to open space, a rural environment yet close proximity to jobs and education around the edge of it I urge you not to spoil this unique contribution that our Green Belt brings to the lives of Wirral residents
DOR00598	Eastham is being destroyed by the government. We have little enough green belt land and now the government want to take that and build on it. There is no regard for or interest in Eastham. It's apparent by what is being proposed. It's an absolute disgrace. Eastham is a small place which will end up over populated and the history of this lovely area will be lost forever. There is so little green belt land here now, we need to fight the proposals and preserve what we have.
DOR00599	[SAME AS DOR00455]
DOR00600	We need to save this iconic scenic Wirral thoroughfare to a beautiful hamlet with wonderful walk ways horse paths and cycle paths - for Wirralians to enjoy and take in the air and still feel like we are in the country. To have such a treasure at our finger tips and for our young to enjoy with amazing sunsets and grazing horses! All this should not be lost. Shame on you if you can't or won't save this for your Wirral residents and future generations to experience. Walking down Roman road with our children over the way to Storeton and then under the motorway access to Thingwall corner is a beautiful walk in the open air. If your easily tempted by cash at the highest bidder than by your conscience for building on green belt land.....then shame on you!! Put pressure on Peel holdings and the likes that buy up prime land on the water front along our coast line from Tranmere to Bromborough/ Eastham and just erect metal warehouses that lay empty!!!! or central Birkenhead off corporation road and price street with bags of land idea for new houses that could regenerate our dying town!!! Yet no you want to go ahead and Just concrete more of our lovely country side. Disgusting and it should not be allowed!!!!!! Green belt needs to be protected!!!
DOR00601	[Attached a petition with 74 signatures objecting]

DOR REF	RESPONSE
DOR00602	<p>It seems that central government has given local authorities the green light to identify land for building new houses in order that central government may be seen to be doing something to enable younger people to buy their own homes. Very laudable aim and I can understand hard pressed local authorities wishing to build up housing stocks in their areas in order to gain income from poll tax apart from anything else. As an aside, Wirral Council introduced a free newspaper about two years ago which only costs £250,000 a year to produce and they can't give it away. I can also understand land owners being keen to sell their land for as much as they can get and not caring too much what use the land is put to. Building supply companies and builders will no doubt be gleefully looking forward to a vast increase in work and profits. This is no doubt happening across the country and Wirral should be treated no differently to avoid the easy criticism of nimbyism. The builders of course prefer to build on greenbelt land because there are fewer/cheaper problems with existing constructions and they have a clean slate from the outset. As no doubt in other parts of the country, there is land in The Wirral Peninsula which is not greenbelt and is available for building houses and has been so for at least the last ten years. One might fondly imagine that Wirral Council would build on that first and preserve as much of the greenbelt as it is possible to do but that is not in their nature. Two examples of available brown belt land that is being ignored by the Council are:</p> <p>1) The River Streets, Birkenhead (the area between Corporation Road and Beaufort Road) where some 10-20 streets of houses were demolished and the land left as a vacant, rubbish strewn, wasteland with no sign of any rebuilding going on there.</p> <p>2) The Mersey Docks & Harbour Board Estate bound in the south by Birkenhead, the north by Wallasey, the west by Bidston and the east by the River Mersey. The estate is owned by a privately owned investment company called Peel Holdings. The dock estate is massive and centres around two massive bodies of water (the east and West Floats) and is crossed by three main roads. Four existing Mersey rail stations are within a mile of the Dock Estate as are two ferry boat terminals. I am no fan of Peel Holdings and in the ten years or more that they have owned the dock estate, Peel Holdings have refurbished one flour mill (and converted it into flats which I presume provides something in the order of 100 housing units); and built an adjunct to Wirral Technical College. Only a small part of the Dock estate is used for cargo handling and shipping. That leaves enough land on the dock estate which is as yet a total hinterland that could be developed to provide thousands of housing units. When one asks the question about why Peel Holdings is allowed to land bank land and not build on it, it seems that Peel Holdings claim that they have tried to build on the dock estate but their efforts have been blocked by Wirral Council. Wirral Council are allegedly blaming Peel Holdings for not getting on with the job and we have reached a stage now whereby Peel Holdings have allegedly taken out whole page adverts in the local press trying to explain their position and the hindrance they claim they have been subjected to by the Council. What the truth of the situation is, we don't know because the Council prefer it seems to conduct their business in as much secrecy as possible. It seems a recent meeting was held in West Kirby Community Centre to which the public were invited but could only get access to the meeting if they had first booked a ticket on line in order to then get through the turn styles. So, unlike in other parts of the country e.g. Manchester, Leeds and Birmingham where comparatively mingy little canals and water fronts are used as a focus and selling point for new housing units, museums and theatres etc., here in The Wirral, what could be a glorious opportunity for development centred on the banks of The Mersey and marina like around the enclosed docks is, it seems, totally dismissed. It isn't as if the Council haven't got form for building on greenbelt when one looks at the building of Arrowe Park Hospital. The hospital would have been ideally situated on the Dock Estate and been far more accessible to all concerned but instead the Council dug up about 300 acres of the park. The latest rumour is that Unilever Estates have indicated their willingness to sell 30,000 acres of what is presently farming land (from Moreton to Burton) for building houses. Also, that at least three tenant farmers have been put on notice that their tenancies will be terminated. Levers allegedly had a recent secret meeting with Council officials and one of the outcomes was increased security measures at their offices in anticipation of public protests.</p>
DOR00603	<p>I write you to PROTEST in the STRONGEST POSSIBLE TERMS regarding your proposed wholly unnecessary release of Wirral's GREENBELT land for development; when by your own estimation there are more than sufficient alternative sites available (See WBC Cabinet Meeting 23rd July 2018, states "Housing Land OUTSIDE THE GREENBELT to be capable of providing 7,635 DWELLINGS") it is clear that this alone is more than sufficient to meet any Legal obligations regarding 'THE LOCAL PLAN'. As Wirral's house building requirement has been reduced to 5,925 houses (considered by many to be still too high) & existing House building projects, notably The PEEL GROUP'S 'WIRRAL WATERS' Project, which proposes, with your & WBC's help, to deliver 6,450 homes over the 15yr time frame involved & ultimately 13,000 Dwellings! (see 'OPEN LETTER' to YOU dated 10th Sept' 2018, from Peel Group Director 'Wirral Waters'; of which more later).</p> <p>Wirral will, ultimately show a large surplus of available homes without even touching OUR irreplaceable GREENBELT & thus avoid the Conurbation of Wirral's Villages allowing each to maintain their own unique & Historic character; such as IRBY, THINGWALL & PENSBY (Which YOUR PLAN actually proposes to DESTROY). I & others have pointed out, at your so called "Public Consultation" presentations various FACTS from WBC's own 'WIRRAL COMPENDIUM of STATISTICS 2017' so I shall not repeat those here, as being Council Leader you should be well aware of a declining & ageing population with FALLING BIRTH RATE, REDUCED LIFE EXPECTANCY & The number of females in the FERTILE AGE GROUP (15-44yrs) MORE than halving over 10 years from 36.7% in 2008 to 16.9% in 2018! However, I mention the foregoing as you propose a totally disproportionate Build Programme, I shall therefore give you the benefit of the doubt & assume you to be ignorant of YOUR OWN "FACTS"; as to make such propositions in knowledge of these would surely be CRIMINALLY IRRESPONSIBLE? If not, then it should be! I respectfully request that you adhere to your "BROWNFIELD FIRST" promise that you & your Councillors have repeatedly made to the PEOPLE of WIRRAL, that you STOP the closure of & threat to WIRRAL'S Farms/Farmers which in concert with LEVERHULME ESTATES appears to be happening BEFORE (i) the "Consultation Period" has expired & (ii) any "Conclusion" has been reached.</p> <p>One last question, referring earlier to the "OPEN LETTER" from Director 'Wirral Waters' THE PEEL GROUP. Will Council Leader WBC please take [Director of Peel Holdings] advice & "...be honest with the people of Wirral and correct the misleading information you are distributing."? [Director of Peel Holdings] also states that PEEL "...could deliver circa 1,000 new homes by 2022."</p>

DOR REF	RESPONSE
DOR00604	<p>As residents in Higher Bebington we wish to express our opposition to your proposals in respect of development on Green belt Land on Wirral on the following grounds:</p> <ol style="list-style-type: none"> 1. Inadequate consideration has been given to potential development on the Wirral Waters site which could readily satisfy the identified housing needs. No explanation has been provided as to why this land cannot be developed and no reason provided as to why the Council does not use its statutory powers to ensure development takes place there. 2. Inadequate consideration has been given to the availability of brownfield or urban land e.g. as set out above and development of so called high street retail areas currently standing empty which given the decline in the need for land for retail use could be used for residential development. Further no account has been taken of currently unoccupied or empty homes nor of the potential of providing incentives such as a council tax holiday to encourage development. 3. The proposals are based upon flawed data in failing to reflect the decline in population projections and the trends in employment with greater automation and persons working from home and hence less need for land to be required for industrial/commercial use. Land currently used for such purposes is likely to become available but no account of this has been taken. 4. The proposals are contrary to the NPPF Guidance in respect of Green belt land; the fundamental criteria of exceptional circumstances being demonstrated are not met. If allowed they constitute a wholesale loss of Green belt land on the West side of the M53 corridor. 5. In respect of your proposals in relation to development in Higher Bebington and Storeton and in particular along Levers Causeway; <ol style="list-style-type: none"> a) They contravene the NPPF Guidance in that they constitute an unrestricted sprawl of development beyond the (current so to speak) boundary of Mount Road b) Taken in conjunction with the proposals in respect of other Green belt areas they will lead to the merging of developed areas across the Wirral effectively joining Woodchurch with Bebington and Bromborough. c) It represents the total loss of Green belt land in the Bebington Ward: down from 50% or 366 Hectares to nil and as such also contravenes your policy in respect of publicly accessible open space within a certain walking distance of development. d) It would represent the loss of a unique and valuable public amenity and vista toward the Welsh hills. Further local people use the quiet lanes in this area for a variety of leisure purposes and this would be significantly adversely affected due increased traffic as well as causing the loss of valuable agricultural land, rich in wildlife of various types which cannot be replaced elsewhere. Your plan is erroneous in describing this as land used for pasture and horse grazing. It has, for very many years, been used as prime arable land for crops, such as, beans; rapeseed; barley and in the current year peas and now wheat. Further, the hedgerows in this area (extending to Landican and Brimstage) are a very important corridor for birds and other wildlife. I undertake bird counts and surveys for the British Trust for Ornithology in this area, specifically including for the British Bird Atlas, and can vouch for the foregoing. Additionally, this area to owl species including Barn, Tawny and Little owls.
DOR00605	<p>Removing adjacent farm land from Green Belt protection will inevitably expose that land to urban infill development. The principle reason for conserving Saughall Massie Village has been to protect its semi- rural character, which includes farms, an equestrian centre, and many listed farming and non-farming related buildings and structures. The Green Belt fields surrounding our village are an integral aspect of conserving the village character. If Green Belt protection is removed then development is certain. Absentee landlords have already sold options to developers should planning be made easier through removing local fields from Green Belt protection. Without the fields, the farms and their buildings will cease to be economically viable, and the semi-rural aspect of the conservation area will collapse. This would be a complete breach of the founding principles established by WMBC when the Conservation Area Society was first established. Most importantly the largest field in Saughall Massie, earmarked for potential development, sits on the flood plain of the Arrowe Brook. That field area is a critical run off area at moments of high water. If it was protected from flooding, water would likely flood the adjacent housing estate on the opposite bank. On the wider principle of addressing housing need and identifying appropriate building land we would ask you to consider the following :-</p> <ul style="list-style-type: none"> • The Office of National Statistics has just reduced our projected housing need for Wirral from 800 new builds per annum to only 449. It seems likely that Westminster will reduce the WMBC new build requirement. • A Sky News national housing survey indicates that the numerical supply of houses in Wirral is high, and more than adequate to satisfy demand. However, it identifies the poor quality of private rented housing in areas such as Birkenhead as the primary housing problem, not the absence of new build in Green Belt areas. • Development Director of Peel Holdings confirms they can build 1500 new units by 2022 and 6450 by 2033 with an ultimate goal of 13,000 new homes on the brown field Birkenhead sites of Wirral Waters. • The short term Wirral housing need is the improvement of private rented accommodation in areas such as Birkenhead, New Brighton, Egremont, Rock Ferry, New Ferry, Tranmere. The need isn't in Green Belt areas. Those in most need could not afford to buy the houses that would be built on the proposed Green Belt area sites. • Until quite recently Wirral planning policy was to disallow any housing development west of the M53, which encompasses the greater part of Wirral's Green Belt. The Council at that point having reviewed housing requirements, clearly felt that housing needs could be accommodated by developing brown- field sites on the eastern side of the M53. What has changed? <p>Conclusion:</p> <p>There are many unexploited brown-field sites east of the M53 and some west of it, which have been offered up as potential development. Wirral Waters is the major site. In view of the lower ONC new- build target it seems perfectly possible, as the Labour leader of WMBC, [council leader] has admitted - that "no incursion into the Green Belt might be required". Given the locality of those who are in most housing need, wouldn't [council leader] be better employed developing these areas rather than the Green Belt?</p>

DOR REF	RESPONSE
	We hope that WMBC aren't using the Local Plan consultation process as a prelude to reviewing the Green Belt boundaries anyway! Could it be that financial reasons are driving the review of Green Belt boundaries, not housing need? Are anticipated budgetary pressures encouraging higher value house building in the Green Belt that will generate additional council tax revenue? Whilst Green Belt can be built on if 'special circumstances' can be proved, and dire housing need might be such a circumstance.
DOR00606	I wish to object to the plans for closing the Bromborough Civic Centre and Library. Due to the cuts by the Council the Library has far shorter opening hours. The Civic Centre is a great focal point and many people use same. If the Council would spend money on existing facilities instead of wasting funds on a golf scheme which serves the few instead of the many. As to closing the car park which I use at least 4 times a week you may as well kill off the Village with the loss of Council Tax. There is building land free where the Bebington Council Offices used to be. What is happening to that land. As usual there does not seem to be a common sense approach.
DOR00607	As an aside, I am opposed to all building on green belt land on the Wirral, as it is only a small area, and yet has a population of 300,000. There are plenty of brownfield sites and the government has vastly overestimated the number of new homes necessary. I have just heard that there is a plan to build houses on Lever Causeway (which is an avenue surrounded by fields) and am shocked by this as it is a most scenic area and in fact the nearest green belt land to the densely populated town of Birkenhead. Whenever I go along it in summer, it reminds me of a beautiful and stereotypical road in the middle of France. Furthermore, the area on the South side of this road is called "Battlefields". Thousands of arrowheads have been found there and nearby Storeton is an ancient village. This whole area is connected to the Battle of Brunanburh in 937 AD. This battle was massive, was of huge importance and changed the course of English history, but the exact location is not yet known and the area in question, to my knowledge, has not been fully examined for archaeological evidence.
DOR00608	This site is not suitable for housing. This field was used to tip industrial toxic waste during the 1970's. Many lorry loads were tipped here by the building firm Wimpey. The soil should not be disturbed below ploughing depth. This can be verified by farm and council records.
DOR00609	We wish to object to the intention of building houses on the causeway and surrounding areas. This will destroy our countryside which we know and enjoy We have seen buzzards ,owls, kestrels which are all educational for the next generation. This will put even more pressure on all our amenities...for example schools, doctors not to mention the hospitals which, as we are told are at breaking point. And now the walk in centres are under threat. The houses which are to be built here will hardly be social housing as the locality will demand a much greater monetary value. Bebington was voted the most desirable place to live recently....why are you trying to destroy it?
DOR00610	I live in the Conservation Area of Eastham Village and I strongly object to the council's current proposals for the Green Belt areas as listed above. If the above proposals go ahead there will be : More traffic, pollution and congestion - Local services will be oversubscribed - The area will be devoid of open spaces and more trees will be chopped down - The urban sprawl will get worse - There will be severe encroachment on the local countryside - The setting of historic, medieval Eastham Village will be damaged. These are unacceptable and avoidable. The Council should assist in urban regeneration by encouraging the recycling of derelict and other urban land first.
DOR00611	Please do not interfere with our green belt. Re-generation is the way forward e.g. New Ferry. Peel Holdings say they can build 1000 homes by 2020 & up to 6,450 in the next 15 years with the Council's support & cooperation. Their ultimate goal is the delivery of 13,000 homes! All that can be provided on land in the Wirral which is not green belt. E.g. at Wirral Waters. The Council has stated that government ministers have imposed a target for Wirral of at least 12000 homes by 2035. It is a matter of public record that government ministers provide only an estimate for the guidance of the Local Authority. The Local Authority has complete freedom to determine its own figures. Deeply concerned at the proposals concerning the use of Green Belt generally and in particular those concerning north of the M53 motorway. The Council's proposals are flawed for the reasons: 1. Housing Needs 1.1. The Council's proposals are predicated on need to provide at least 12,000 (i.e. 800 per annum) new homes within the next 15 years. The basis for this assertion is difficult to determine with any certainty as the figures circulated generally by the Council appear to be based on either inaccurate or other flawed information and/or statistics. 1.2. Despite calls for evidence of that requirement from the Government to be produced, none has been put into the public domain. The Government submits estimates only is for the local authority to determine the actual figure. On 14 September 2017 the then Minister for Housing, Communities & Local Government, Sajid Javid, stated categorically in the House of Commons as follows:- "We are not attempting to micromanage local development. It will be up to local authorities to apply these estimates in their own areas; we are not dictating targets from on high. All we are doing is setting out a clear, consistent process for assessing what may be needed in the years to come. How to meet the demand, whether it is possible to meet the demand, where to develop, where not to develop, what to develop, how to work with neighbouring authorities and so on remain decisions for local authorities and local communities." 1.3. That statement has not been since withdrawn. What has been said by the Council about the number of homes being imposed by the Government is both incorrect and misleading. 1.4. Statistical information released earlier this year by the Office for National Statistics results in an assumed requirement for new homes in Wirral in the next 15 years of about 7,000. This is substantially less than the figure of 12,000 quoted by the Council. Peel Holdings, the developers of Wirral Waters, confirmed in writing to the Council on 10 September 2018 that (a) the Council had been quoting misleading figures in relation to the number of homes Peel Holdings could provide in the relevant period by underestimating the same and (b) that it could provide up to 6,450 new homes in the period with the Council's support and co-operation. This would then mean that less than 1,000 other homes would have to be provided in the period. This should be easily deliverable by developing brownfield sites and other suitable sites outside the Green Belt of which there are a sufficient number to accommodate this level of provision.

DOR REF	RESPONSE
	<p>2. NPPF Policies 113, 133, 134, 137, 143, 144 and 170 are cited.</p> <p>3.1. The Council proposes that all the Green Belt north of the M53 motorway should be removed from Green Belt protection for the provision of homes. Whilst the Council has acknowledged in consultation meetings that some land such as the Dibbinsdale Nature Reserve and the Eastham Country Park would not be available for development for homes, this nevertheless leaves large swathes of Green Belt land upon which development could take place. In the event of such development, the present urban sprawl of Bebington, Spital, Bromborough and Eastham would be considerably extended and extended, in fact, up to the motorway boundary. No Green Belt land north of the motorway would be left as such. Removal of this land from the Green Belt would encourage the very things which policy 133 sets out to prevent. On any objective view, the justification for such removal simply does not exist.</p> <p>4. Policy 134</p> <p>4.1. So far as point (c) is concerned, this is a fundamental purpose of Green Belt policy. If development of Green Belt land is permitted, it operates, amongst other things, to release pressure to assist in urban regeneration. There are quite a number of areas in the Birkenhead, Rock Ferry, New Ferry and other urban conurbations in Wirral which would benefit considerably from urban regeneration schemes. It is quite unfair to the people who live in those areas to take any step which would release pressure to carry out such regeneration. Retaining the current Green Belt actively promotes and encourages that regeneration and is an added reason why the Green Belt should not be encroached upon.</p> <p>5. Policy 136 provides a high hurdle for the Council to surmount in relation to its proposals for the Green Belt. The Council attempts to justify its proposals by making its case for additional homes over the next 15 years. That case is flawed as it is predicated on flawed predictions of the number of homes which will be required during the period. The Council cannot contend that exceptional circumstances exist for altering the Green Belt boundaries as it cannot properly determine whether or not such circumstances exist by reference to flawed data.</p> <p>6. Policy 137 - Whilst the Council has attempted to show that it has examined fully all other reasonable options, in fact it has failed to do that because its appraisal of the options has been made using flawed data to support its case. The Council must make its examination of other options in a proper objective manner using correct information.</p> <p>7. Policies 143 & 144 - The Council states in Wirral SHLAA 2017 that it has adopted a scoring system to determine the impact of its proposals on the existing Green Belt. Such a system may be useful as a starting point but it is a broad brush and fails to take proper account of local issues and harm which may arise to specific localities. These are matters which are not addressed properly by the scoring system. A full root and branch analysis of potential harm to each site within the Green Belt needs to be undertaken and then a decision as to harm to that site, using that analysis, should be made in accordance with this policy.</p> <p>8. Policy 170 requires protection of soils and recognition of the economic and other benefits of the best and most versatile agricultural land. Much of the land which has been analysed is classified as BMV and therefore enjoys the added protection of policy 170. Whilst it cannot be said that all agricultural land north of the motorway is definitely BMV, it is reasonable to suppose that agricultural land near to and in the vicinity of BMV land is likely also to be BMV land. Accordingly, no agricultural land which is BMV should be removed from the Green Belt under any circumstances and any land near to or in the vicinity of such land should not be considered for removal from the Green Belt unless and until a proper soils analysis of each such parcel of land has been undertaken and the land in that parcel determined to be land other than BMV.</p> <p>9. Development Issues - a number of issues which have not been addressed either fully or at all in the Council's proposals. Extensive research has shown that living within a defined distance from a motorway gives rise to health problems, some permanent, in both adults and children. The Lancet 2007 research in the USA showed "pronounced deficits" in lung development in children who lived within 500 metres of a motorway. These affected children in the 10 to 18 age group and showed that the damage could be permanent. The Journal of Thoracic Health in the USA published in 2015 corroborated the results published by the Lancet in 2007. The Royal College of Physicians 2016 linked cancer, asthma, stroke, heart disease, diabetes, obesity, changes linked to dementia, general illness and premature death to living in air polluted areas. The Public Health Service of Amsterdam 2017 found that living near to a dual carriageway road was as harmful as being exposed to second-hand (i.e. passive) smoke from 10 cigarettes a day. The Guardian published in 2018 a report of research carried out in China found that air pollution harms cognitive performance in persons of all ages and was also linked to mental illness in children. On 19 September 2018 The Times published the results of research showed that those exposed to fine particulate matter PM2.5 and nitrogen dioxide were particularly vulnerable to health problems. The main source of fine particulate matter PM2.5 and nitrogen dioxide is road traffic. A substantial swathe of land in the Green Belt north of the M53 would fall within 500 metres of the motorway giving rise to proper concerns regarding the health of persons living within those areas.</p> <p>The Public Health Annual Report 2017 published by Wirral Borough Council states, amongst other things, that:-</p> <p>(a) it supports "people to take more control of their health and well-being" by "most of all, expecting better for their own health and that of their families";</p> <p>(b) 1 in 3 avoidable deaths that year were caused by cancer, cardiovascular disease accounted for 1 in 4 such deaths and that coronary heart disease, lung cancer and chronic pulmonary disease were amongst the most specific causes of avoidable deaths. By releasing Green Belt land near to the M53 motorway, the Council is not supporting people to take control of their health and well-being. In fact, it is encouraging the building of homes in known polluted environments which independent research has shown leads to significant ill-health particularly in children. This is completely inconsistent with the stated aims of the Council mentioned above. Whilst the Council states that Wirral residents should expect better for their own health and that of their families, it seems that the Council is not prepared to support that aim in practice as it intends to allow development of homes within the vicinity of the motorway. All homes should be built at least 500 metres from the motorway. A cordon sanitaire at least 500 metres wide should be put in place immediately along both sides of the M53 motorway for the whole of its length to provide proper protection of the health of Wirral residents. Taking account of the Council's stated position, Wirral residents have every right to expect that such a cordon sanitaire will be imposed. The Government has the stated</p>

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	<p>aim of all petrol and diesel cars being withdrawn from use by 2040 and replaced by electric cars. It is far too soon to assume that it will be and this date is beyond the scope of the proposed local plan. Any decisions regarding whether or not a 500 metre width cordon sanitaire is still required after 2035 must be deferred until the consultation period commences the local plan period after 2035. That is the only safe decision which is consistent with the statements the Public Health Annual Report 2017.</p> <p>10. Site SP040 is particularly unsuited to removal from the Green Belt for the following reasons:</p> <ul style="list-style-type: none"> (a) all of the site is currently used for agricultural purposes and has been for very many years; (b) development of the site would give rise to significant highways issues; (b) there is a substantial swathe of the site within 500 metres of the M53 motorway. <p>The site has been part of Claremont Farm for very many years and has been farmed by several generations since 1906. The land is used for growing vegetables and similar produce which are sold in their neighbouring farm shop and also the grazing of animals. Crops currently being grown on this site include maize, sprouts, spring cabbage, savoy cabbage, red and white cabbage, red and green kale, cauliflower and broccoli. These vegetables are cut fresh each day for the neighbouring farm shop and their supply needs to be close to the shop for obvious reasons. The various crops need to be rotated over the site from year to year in accordance with well-understood and long-standing principles of crop rotation. This site is large enough to permit properly managed rotation including the provision of some grazing for livestock (presently sheep) which is an essential cycle in crop rotation in order to provide the natural manure which the land requires to retain maximum fertility. The lambs and ewes need fields close to the farm itself during the lambing season.</p> <p>The land in this site substantially qualifies as the best and most versatile agricultural land. The Council's own Summary of Initial Green Belt Assessment for Public Consultation acknowledges that 91% of this site so qualifies and it is submitted that the small proportion which does not is probably accounted for by the area occupied by the former farm house and garden surrounding it now in private residential ownership. The whole of this site is also clearly delineated in the Map of High Quality Agricultural Land which appears as Appendix 7 to the Council's Proposed Review Methodology issued in October 2017. The use of this site for farming purposes provides enormous economic and other benefits to the community generally as is evidenced by, amongst other things, the longevity of the farming activity carried on there, the busy farm shop and the visits to the farm by pupils from local schools who have the opportunity to see first-hand how a successful farm operates including the various steps in the food chain from growing food to its appearance for sale in shops. This whole of this site is included within a Higher Level Environmental Stewardship Scheme operated by DEFRA. All the effort which has been put into this Scheme to date, and the public funds spent on it, will be lost for good if the land is developed. The fact emphasises the importance of the land in agricultural and environmental terms and maintaining it as such. A small part of the site is designated as within a Priority Habitat Inventory by Natural England and as such should be excluded from any area for development in any event. The provision of new homes on this site would exacerbate an already unacceptable traffic situation on the B5137 road to the Three Stags cross roads from the roundabout at junction 4 to the M53 motorway. It is a two lane B class road and as such is not suited to high volumes of traffic. At peak times during the day it becomes very congested with long tailbacks in both directions. The provision of homes on this site would require at the very least some means of access for motor vehicles from those homes to the B5137. Widening the B5137 along the length from the junction 4 roundabout to the junction with Old Clatterbridge Road would serve only to increase the bottlenecks along that length of it which occur regularly already.</p> <p>Widening the B5137 from junction 4 to the junction with Old Clatterbridge Road would also require the destruction of more than 20 attractive mature trees from the countryside together with hedgerows providing shelter to birds and small mammals. Hedgehogs are known to inhabit the area and their habitat is already very much under threat generally.</p> <p>The Council's own Summary of Initial Green Belt Assessment for Public Consultation recognises that there would be traffic problems if this site was to be developed, which seems to be an understatement, but fails to suggest any solution to them. Planning Policy Statement 3: Access, Movement and Parking Policy AMP2 states:- "Planning permission will only be granted for a development proposal involving direct access, or the intensification of the use of an existing access, onto a public road where such access will not prejudice road safety or significantly inconvenience the flow of traffic." It is very difficult to see how any traffic scheme involving this site could possibly meet these requirements and the Council's proposals do not put forward any solution to this problem. That in itself makes this site unsuited for development.</p> <p>11. Site SP042 - The matters mentioned in paragraph 10.1 apply equally to this site and are repeated in relation to it. Traffic problems associated with the development of this site are different from those associated with the development of site SP040 but nevertheless are similarly acute..</p> <p>The Summary of Initial Green Belt Development Assessment states that up to 939 dwellings could be provided on this site. Development on that scale, which is clearly a present intention of the Council, would swamp the local roads and probably would bring traffic on them to a standstill at peak times. The Council's Assessment recognises that there would be traffic problems if this site was to be developed, which seems to be a gross understatement, but fails to suggest any solution to them.</p> <p>12. Site SP043 - The Summary of Initial Green Belt Assessment for Public Consultation states that only a small area of 21.5 hectares at Vineyard Farm would be potentially developable so it is assumed that no development would be permitted to take place on any other land within this site. The developable area cannot be identified with certainty by a reader of the Assessment. If the Council considers that land additional to that specified could be released for development, that fact should have been clearly stated and any failure to make that clear would amount to a failure to provide full and complete information in the consultation process apart from any other considerations.</p>

DOR REF	RESPONSE
	<p>The Summary states that the site includes some of the best and most versatile agricultural land - 24.42 hectares. It is not clear how this area has been calculated but it does not appear to be correct. Reference to the Map of High Quality Agricultural Land which appears as Appendix 7 to the Council's Proposed Review Methodology 2017, which presumably is correct, shows that the all the land within the curtilage of Vineyard Farm, amounting to about 56 acres, falls within the classification of the best and most versatile agricultural land and, for that reason, should be excluded from development and remain in the Green Belt.</p> <p>Consultants were instructed to undertake an analysis of all land within the curtilage of Vineyard Farm, comprising 24.07 hectares in total, to establish unequivocally the status of that land. Their analysis shows that apart from a small area of woodland comprising 1.37 hectares, all the land within the curtilage of Vineyard Farm falls within the classification of the best and most versatile agricultural land. In addition, it should be noted that the vast majority of it is under active agricultural use and cultivation. The results substantiates my submissions and provides extra emphasis. It would be a disgrace to permit any of that land to be removed from the Green Belt and/or to allow it to be used for housing or any other development quite apart from the fact that such use would be contrary to well established policies in relation to existing Green Belt. Part of the site is designated as within a Priority Habitat Inventory by Natural England and as such should be excluded from any area for development in any event. The Summary does not envisage any traffic problems with this site but this is an unsafe assumption. The provision of 323 dwellings on this site would alone inevitably cause severe problems with traffic movement on this road.</p> <p>That coupled with the proposed 939 dwellings on site SP042 would be likely to cause semi-permanent, if not permanent, bottlenecks on Poulton Road and its tributaries. Taking account of the intended number of dwellings, accesses via Venables Drive or Dibbins Hey, which are residential estate roads only, would be simply impracticable because of the volume of traffic.</p> <p>13. Conclusions The removal of all Green Belt north of the M53 motorway is entirely unjustified by the evidence presented by the Council. It beggars belief that the Council could consider the removal of all or even a majority of Green Belt land north of the M53 motorway as a sound policy decision for the future. A 500 metre cordon sanitaire should be provided along both sides of the M53 on public health grounds. Such a cordon sanitaire would remove substantial areas as suitable for development from sites SP040 and SP042. In the case of site SP040, all but a very small triangle of land at the north end would be excluded and in the case of SP042, all but a sliver of land of about 250 metres in width along its frontage to Poulton Road would be excluded from development. There is no point in excluding the small triangle to the north of SP040 from the Green Belt in those circumstances. Similar objection can be made to the exclusion from the Green Belt of the small sliver of land from SP042. In any event, if the proposed cordon sanitaire is implemented, as it should be, there will not be any strong boundary to the revised Green Belt at the division of these sites between the northern edge of the cordon sanitaire and the part of those sites remaining in the Green Belt. Such an artificial boundary would be contrary to Green Belt policy and is sufficient reason for keeping both of these sites within the Green Belt. All land which is the best and most versatile agricultural land should be excluded from any development and protected as such as should all land within a Higher Level Environmental Stewardship Scheme and within a Priority Habitat Inventory. Any analysis of the traffic problems which would arise in the event of the development of the sites mentioned in this paper would confirm that the additional traffic generated would impose unacceptable additional burdens of the existing roads and that there is no readily practical solution to them. The removal of sites SP040, SP042 and SP043 from the Green Belt would be in direct contradiction to NPPF policy 134 as to do so would promote urban sprawl, permit encroachment on the countryside and would not encourage urban regeneration.</p> <p>Removal of those sites from the Green Belt would actively encourage development of greenfield sites at the expense of badly needed urban regeneration in other areas in Wirral which is directly contrary to Green Belt policy. The loss of sites SP040 and SP042 would have a disastrous effect on the viability of Claremont Farm as it would lose productive agricultural and grazing land which it would be unlikely to be able to replace, it would lose its financial support under the Higher Level Environmental Stewardship Scheme and its recent substantial capital investment in the new farm shop (a successful venture enjoyed by Wirral residents generally) would be wasted and irrecoverable. The loss of either site would be very damaging but the loss of both would be a financial tsunami from which the business would be unlikely to recover. It would be reasonable to suppose that the loss of 56 acres of working land from Vineyard Farm would result, at the very least, in grave financial hardship to the business carried on there. The Council's calculations of the number of homes needed to be provided in the period to 2035 are inaccurate because they are based on flawed data. Accordingly, the Council should not rely on those calculations in support of its proposals.</p> <p>Sufficient doubt has been cast upon the accuracy of the information provided by the Council before and during the consultation period as to render it as unreliable (at best) or even misleading. Accordingly, the current consultation exercise should be discontinued and commenced again after the provision of accurate information to Wirral residents. The fact that any site included in the consultation is not specifically mentioned in this paper does not mean that I accept any comments made by the Council in relation to it as valid. [Consultant's report attached]</p>
DOR00612	I'm very concerned about the plans to build on Lever Causeway, This is a beautiful stretch of greenbelt. It's quite a unique straight tree lined road. I always show it off to my friends from abroad when they come to visit me in the Wirral. I can't understand why this would be used first when there is so many brownfield sites in the Wirral. On top of this there are well over 5000 empty properties in Wirral.
DOR00613	I am writing to voice my concern over the plans to build on Eastham's greenbelt. We need to keep and protect our greenbelt. It's important to save our land and trees and local nature. Plus there are not enough local amenities to accommodate all the new houses. There are already a lot of new builds in Eastham. Please can we retain our greenbelt.

DOR REF	RESPONSE
DOR00614	<p>The proposals will result in the loss of green spaces FOREVER, which will be the legacy of this Council will be remembered by going forward to elections. I am a Labour Party member but will immediately remove myself from the party if your proposals go ahead as suggested. Further, I will NEVER vote Labour EVER again.</p> <p>My objections are due to the following:</p> <ul style="list-style-type: none"> . Local population growth figures do not substantiate the housing targets identified by the council/ DCLG. . Under use of existing empty housing. . All efforts should be made to identify and expedite any planning applications currently 'stuck' in the system. . All efforts should be made to approve any planning applications that have been approved but no development has started. . Land values on Green Belt may not be sufficiently profitable to enable developers to build affordable homes- which means more expensive homes are built instead. . Isolated nature of Green Belt sites may result in poor access to local facilities e.g. regular public transport, shops etc. . Loss of biodiversity and public amenities, e.g. access to natural habitats, woodland, footpaths and bridleways etc. . Severe potential negative impact on core services: health care, education, transport (extra pressure on already inadequate access roads to high employment areas such as Liverpool via the tunnels, Clatterbridge roundabout, the M53 and Chester High Road). Not to mention increased traffic at all major junctions across Wirral. . Poor employment opportunities for new neighbourhoods. <p>I would like my objections to be raised during all consultation meetings prior to and including 26th October 2018 and beyond.</p>
DOR00615	<p>You lot should be ashamed of yourselves, there will be no Greenbelt left in Eastham soon. You lot are a bunch of greedy corrupted idiots. shame on you.</p>
DOR00616	<p>I am writing to lodge my very strong objections to the Local Plan, and more specifically to the site of SP043 (Vineyard Farm and the land east of Poulton Road, Spital). This area should not be released from greenbelt for housing development. Firstly, I urge you to note the devastating environmental impact of such a development. This site backs onto an area of SSSI (Dibbinsdale). There is plenty of evidence of uncommon animals that make their home on the land of Vineyard Farm, for example, bats, red-legged partridge, pheasants, owls and various birds of prey and along with protected species of flora and fauna, they would have their habitat destroyed or potentially contaminated from flood water and sewerage. Secondly, in this uncertain Brexit world, there is an urgent and important need to preserve our good quality agricultural land in order for our area, and the country as a whole, to be able to feed ourselves. Vineyard Farm, and much of the other sites listed in the Local Plan for potential release from greenbelt are high quality agricultural land on which working farms operate. This is why the Council should adhere to their promise of “Brownfield first”. Thirdly, the area of Spital already has woeful infrastructure that is struggling to cope with the demands of the current residents of this area. All local primary schools are oversubscribed. How are they to cope with a potential extra 800 families living in the catchment area? Patients already often struggle to get prompt appointments at the local doctors’ surgery and now with the collapse of the local bus service operator, the elderly and vulnerable residents are unable to access alternative medical care (from Medical Centre at the Bebington Civic Centre) or dental care, all of which lay at a great distance from the estates of Spital that exist currently. To further reiterate the problems of transport, the current residents, many of whom are elderly and/or vulnerable on the Poulton Lancelyn estate, are cut off from the public transport network. Spital rail station is inaccessible to those with mobility problems (both young and old), and there is no bus service to connect the estate with the few major bus routes that have remained in this area. It was a very limited and inadequate service anyway prior to the collapse of Avon buses. A large housing estate on the site of Vineyard Farm would also exacerbate the problems of traffic congestion and endanger road users further. Poulton Road is already excessively busy, particularly at peak times, is narrow as it leaves Spital heading towards Dibbinsdale, and the crossroads of Warren Hey/Poulton Royd Drive is an accident hotspot (many of these collisions/near misses will go unreported officially.) Furthermore, Spital crossroads (at the Three Stags) is a major congestion/accident hotspot also, as is J4 of the M53. An extra 1000 cars that a housing estate would create, would lead to more accidents, more injury and gridlock. Lastly, if SP043 is released from greenbelt and built upon, the Council and housebuilders could be irrevocably destroying areas of national historic importance, being potentially the site of the Battle of Brunanburgh as well as evidence of life from the Neolithic, Roman and Viking eras.</p> <p>In conclusion, the release of site SP043 would irrevocably damage the character of this area, destroy the habitats of protected and uncommon species of animals and plants and strain the current infrastructure to breaking point. From revised ONS statistics, I urge Wirral Council to review the need to release any greenbelt, and specifically SP043, as there is a dramatic reduction in the need for extra housing estates as the population of the peninsula continues to fall.</p>

DOR REF	RESPONSE
DOR00617	<p>There seems to be no consideration to protect the countryside and historic setting of Eastham Village from overcrowding, congestion, pollution and urban sprawl. The beautiful areas of Wirral are being eroded by council planning decisions. Why get rid of more trees and green spaces when such areas have such importance - fresh air and open spaces make it fundamental to our physical health and mental wellbeing.</p> <p>Our narrow village streets are already overwhelmed by traffic but no thought appears to have been given to the addition of several hundred car journeys per week from the new houses being earmarked for the green belt surrounding areas.</p> <p>The Conservation Management Plan for Eastham village, part of Wirral's Unitary Development Plan, is quite clear. It states :-</p> <ul style="list-style-type: none"> • Eastham is an 'Historic village dating back to before the Domesday Survey' • The historic village has retained a degree of separation from neighbouring suburban areas by means of a green 'buffer' of playing fields, landscaped grounds and agricultural areas. • In the application of Green Belt policy on land and affecting buildings within the conservation area or affecting its setting, the character and appearance of the conservation area should be preserved or enhanced. • In relation to Eastham Village Conservation Area the principal planning objectives for the area will be to: maintain a sense of separation from the surrounding built-up area through the retention of open spaces around the village core. <p>This is in addition to the harm to the green belt that will be caused by these proposals.</p> <p>As a local resident I care deeply about our village and its history. If the combination of Green Belt and Conservation Area cannot protect our ancient village within its setting than what hope is there?</p>
DOR00618	<p>As a resident and father to two young Children who have just started at a local school, I felt compelled to write to you regarding this matter, which I feel will have a huge detrimental impact on the local area, both now and in the years to come. The specific development in Barnston will have a direct impact on myself and my young family. However having read the details of the whole scheme and its impact across west Wirral, I feel the potential housing development on greenfield sites will kill the natural charm and tranquillity which makes the Wirral what it is today. The magnitude of this decision will have lasting impacts on the Wirral. The specific development in Barnston will completely spoil the rural character of the area. I would also urge you and fellow council officers to head down to Barnston Road at rush hour and you will see that the existing infrastructure is already close to breaking point. These developments will add much more traffic to the roads at these key times, which will bring the local area to a standstill. I was drawn to this area by the rural charm, which will be completely lost if this development in Barnston goes ahead. It will also set a precedent for land owners to offer up their land in neighbouring fields. I feel there is sufficient brownfield and derelict industrial land across the Wirral which could be used to meet these housing targets. There have been numerous developments in Ellesmere Port recently which have allowed for the redevelopment of brownfield and ex-industrial area to be developed and numerous starter homes built, why can't such a model be followed on the Wirral? I also feel the housing targets set by the government are way out of proportion for what the local area requires.</p>
DOR00619	<p>I understand the need for some housing across the country but it is clear that 12000 houses built locally across the Wirral are not needed when population projection does not warrant this. We are surrounded by water on 3 sides the Mersey the Dee and the Irish Sea so it is a unique area with only 1 way out by land into Cheshire. Wirral is heavily populated already with strain on schools NHS and the roads. One realises this when there is a problem on the M53 motorway chaos ensues across the boroughs roads.</p> <p>And the local plan states that the main area of building should be right next to this motorway? Studies show that poor health and reduced life expectancy are seen when people live next to motorways so how responsible is this? Potential expensive litigation could follow if families are encouraged to live in these areas. If some houses need to be built existing brown belt should be utilised before destroying areas of natural beauty. This includes areas such as Storeton Woods, Lever Causeway, Dibbinsdale and Eastham Country Park so clearly no local knowledge has been sought when producing this local plan. Why is this the case? Building here would merge Bebington and the historic hamlet of Storeton. Lever Causeway provides space for dog walkers cyclists horse riding etc. it is an iconic historical road and it would be an absolute disgrace if there was building either side. Plus what about the valuable agricultural land adjacent next to it? How are we going to feed future generations? It is strange that wealthy West Wirral has hardly been affected by this local plan with minimal disruption to West Kirby the home of the Council leader !!!!! One hopes that there is nothing untoward in the fact that Heswall Caldy West Kirby and Hoylake are not affected in the local plan! Then there is the question of Wirral Waters which is owned by Peel Holdings a massive docklands area desolate which would satisfy the housing demands. What pressure is being placed on them not to just sit on the land? How did they acquire this land? Was there any Council involvement in this? Who else gained from this land acquisition?</p>
DOR00620	[Site Specific appraisal table received]
DOR00621	<p>Additional development within 100m of Clatterbridge road - Having researched further proposals that are under consideration in the depths of the council's website – I have spotted a further huge development that is being considered North of Clatterbridge hospital, less than 100m from development SHLAA 2050 I cannot contemplate the sheer enormity of impact should this also go ahead – our house will be almost completely surrounded by new development; with even further loss of value, increased traffic, risk of flooding (and all other arguments outlined in my original email below)</p> <p>As explained previously – we cannot set the precedence for development in this area – it will very quickly become the greater Bebington area (see proposed developments excluding SHLAA 2050 below). The first issue to address within this development is the huge risk of this development causing a merging between separate towns/villages, a principle pillar upon which the greenbelt was founded to avoid. The situation as we stand today is that there is a 1000m stretch of greenbelt between Clatterbridge and Bebington – separated firstly by the land SHLAA 2050, then the M53, and then land East of the M53 surrounding Claremont farm. Two separate proposals from the council (SHLAA 2050 / land East of M53) both propose to build housing and essentially develop this stretch</p>

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	<p>of land – turning a 1000m continuous stretch of greenbelt into a mere 200m. Furthermore, when we combine SHLAA 2050 with the care home proposal in Thornton Hough, should both developments go ahead there would be a mere 750m stretch of undeveloped land separating Thornton Hough from Bebington, down from 2500m (figs B & C)</p> <p>[Site measurement tool providing distances provided]</p> <p>In my opinion this is in stark contrast to the principles of the Greenbelt, risking merging of these three towns/villages. Should all this land be given up it is inevitable that further infilling would continue in the high value land between Bebington, Clatterbridge & Thornton Hough, given a precedence will have been set with the above proposals from the council – this should be avoided. Importantly, I must also note that the above developments mentioned (Thornton Hough care home & SHLAA 2050) have not been made widely available to the public, only to those in the immediate vicinity of the site, which is not acceptable. The map distributed to the public should include all sites in consideration (Fig D). Finally, I must also draw attention to site SHLAA 2050 which differs significantly from all other sites proposed on the above map in that it does not border non-greenbelt land on any side – indeed it is 750m from the nearest non-greenbelt land as it stands (Fig E). I would propose therefore that it is amongst those sites least suitable for development of those shortlisted. The second key issue related to the significantly shortened distance between Bebington & other locations is the reduction in house price in the area. Clatterbridge road is a highly desirable location, with the current average property price standing in excess of £775K. This premium is due largely to the rural feel & openness that the greenbelt has protected since its inception. Contrast with this the average property price in Bebington at £200K, over 3x lower than that of the street on which the developments stands.</p> <p>It appears that based on recent council/government targets, it is affordable housing that is required predominantly. Therefore, my assumption is that it is low cost housing that is planned to be built on site SHLAA2050 & land East of the M53. With this in mind, I have a huge concern that there will be a significant drop in my property price which would now border the low cost development within 5m vs. when I bought it 3 years ago. I am sure that others in the close vicinity agree, and I'm in the process of getting their signatures in support, which you should expect on a follow-up email. I would therefore like to understand what the council would propose to ensure no/minimal loss of value in property should the three separate developments within 750m radius of Clatterbridge (Fig F) go ahead.</p> <ul style="list-style-type: none"> Increased traffic on an already problematic stretch of road Clatterbridge road is a 30mph road, and busy at peak times, often with stationary traffic, and at off-peak times has a major problem with speeding. Despite multiple complaints over the last few years to the police & other authorities, I've seen no improvement in the latter, with cars regularly going over 60mph on their journey off the M53 at J4. The site SHLAA 2050 has a couple of important considerations that have a potential to affect the local residents, both human and otherwise, that I would like to draw to the attention of the council: <p>Firstly, part of the site is high risk for flooding, as water from the clatter brook can surface around this area (Fig G). Notably – water regularly pools in the low point on Clatterbridge road I have a concern that developments on the land at risk of flooding could change that – potentially affecting (a) the flow of traffic on Clatterbridge road due to surface water (b) the ability for nearby properties to insure their home, and (c) the value of nearby properties. Given how close the flood area is to nearby properties, it would only take a minor change in this domain to have potentially major consequences (see map below)</p> <p>Secondly, the site SHLAA 2050 is covered by priority habitat deciduous woodland highlighted by the woodland & forestry commission as of importance (Fig J). In addition, the area is listed as importance for three species on the RSBP red list (highest priority endangered): the Lapwing, Tree Sparrow, & the Grey Partridge. Preserving this environment & these species should be taken into consideration when choosing sites for development such as SHLAA 2050 – and I would propose that this should not be disrupted by developments. A quick search of alternative sites proposed by the local plan do not show up such important sites with regards to flooding, protected forests & important target species.</p> <p>Summary:</p> <p>Outlined in the above email are a number of key points of consideration for the council that I would appreciate a response to, given the close proximity of the development to my property. I understand the need to expand into the greenbelt to meet government targets, but suggest that SHLAA 2050 is not the ideal site, given when combined with other proposed developments e.g. East of M53 could cause merging of separate communities. I strongly believe that the combination of both developments will have a severe negative affect on the area and will pull Clatterbridge into the greater Bebington area. I highlight above also a huge financial risk on myself & neighbours on house prices given the premium charged in the area to be away from developments, and the risk to the environment associated with building on an area of significance for vulnerable species and at risk of flooding.</p>
DOR00622	<p>We would like to object to the proposed building of 520 houses in the Limbo Lane site. Our concerns include this area and the other proposed green belt areas. Natural England is trying to conserve the biodiversity of this country.</p> <p>Wirral has an amazing range of flora and fauna and by building on greenbelt the wildlife plant and animals will be destroyed.</p> <p>The fields in the Limbo Lane area have trees and ponds. The Great Crested Newt is just one protected species in this area.</p> <p>Pysmian Cables went to great expense to survey the wildlife of the Wirral Peninsula in order to lay the electric cables through to Queensferry. They erected special fences in order to protect the Great Crested Newt in the Limbo Lane area to protect them from the movement of machinery. Wirral is one of the few areas in the North West where this animal thrives.</p> <p>Please consider the Wirral wildlife and beautiful views before it is destroyed for ever. My children and grandchildren deserve to have the environment protected.</p> <p>Stop this building on green belt.</p>

DOR REF	RESPONSE
DOR00623	<p>Firstly I would like to say I don't understand why we need to release any greenbelt on the Wirral and knowing particularly well SP043, object to its inclusion in the proposed release of greenbelt sites. Having reviewed the 'evidence' available I find it deeply concerning that WBC are standing behind 'evidence' that claims to justify a 'need' for an extra 800dpa. ONS data clearly shows an estimate of approx. 10000 increase in population on the Wirral (3%) over the planning period yet the proposed Local Plan using the SHLAA is proposing a population increase of over three times (over 10%) ONS evidence?</p> <p>With respect to the SHMA 2016 I would kindly request you look again at the concerns I have regarding its core 'evidence' and challenge the numbers being used which are creating such a high and unrealistic figure for the Wirral. We must stop the Local Plan in its current form based on a flawed SHMA. This is within WBC power and ability to do so. Please can you ensure WBC stop using incorrect 'evidence' and commission a SHMA using correct information.</p> <p>With respect to SP043, even if there was a 'need' I find its inclusion in any release appalling and in direct conflict with planning rules for the following reasons and request it is removed from the Local Plan.</p> <ul style="list-style-type: none"> • The site includes Dibbendsdale Nature reserve. Building on or next to DNR is encroachment and would have a huge impact on DNR. This is against one of the 5 planning rules and must be removed from the Local Plan. • The site includes SSSI status. Again building on or near to the SSSI will be to its detriment. This site and the immediate surrounding area must be protected. WBC own data includes Core Biodiversity Area for over 85% of SP043. • The site is used in part as a farm providing high value Agricultural Land, providing local produce and employment at the farm and shop. This must be retained as it supports local business. • Spital Road and Dibbendsdale Road are not suitable access to a proposed site for 200 extra houses. One route is particularly dangerous and barely passable in the winter without a 4x4, combined with the very busy Spital crossroads, Site SP043 must be excluded as the increase in traffic at this junction would be dangerous. I object to access to the site being described as 'suitable' it clearly isn't. • SP043 floods, the maps WBC hold also show pockets of flooding. The Fields provide drainage to Dibbendsdale brook into the Nature reserve by natural means. Building on the fields of SP043 will again have a detrimental impact on DNR and the brook and increase the flooding risk to existing properties and the new ones proposed. I know this for a fact and have evidence of land drains that were included on the site due to the flooding risk, Soil condition is clay and SP043 provides natural drainage function from Raby Mere, Building on SP043 will impact not just SP043 but all of the environment connected to it. • Local infrastructure is not capable of supporting further development in this area. There is a small doctor's surgery, No post office, no local playing fields or parks. Access to and from the site would be by car only. The local school is full. What services will these new residents use? I would be very keen to understand who is making the decision to include SP043 and how it can be that a site such as SP043 can ever find itself on a list of proposed greenbelt sites to be released for development when there are far easier and better alternatives. <p>Having reviewed what is required I understand [council leader] is keen on the idea of a Garden Village?</p> <p>As I said above I do not agree with the 'need' and can see as many others do that the proposed number 800dpa is far too high for the Wirral, However because I have reviewed the 'evidence' I would propose that if you must release land you release the following sites and create a Garden Village away from any existing urban settlements and close to existing infrastructure. The sites that could be released, offer the least impact and best links to existing infrastructure are: • SP068 ; • SP069</p> <p>Both of these sites off no impact to high value Agricultural land, no Impact to Bio diversity, No flooding risk and are able to link to the M53 and existing railway. This could be a new Village away from existing urban settlements. Can this be explored before existing residents are again impacted by bad planning and poor judgement in site selection.</p> <p>[Maps attached]</p>
DOR00623	<p>I kindly request you correct the errors within your supporting evidence, most specifically (the proposed parcel Sp043b, a subset of SP043 that could potentially be released for development) and provide me with a copy for my records before the end of the consultation period to enable me to reassess the evidence you are proposing to use in this local plan.</p> <p>1. Incorrect / Misleading assessment of unrestricted sprawl (SP043)</p> <p>SP043 has been described as being 'Highly Enclosed' by the existing Urban Area. (Ref. Table 1 of Background Report, Initial Green Belt Review pg 12. I object to you using this as a means of allowing (scoring) SP043 to be released for development as SP043 boundary contains many features that cannot be developed.</p> <p>I request this is corrected within Table 1 of Background Report, Initial Green Belt Review pg 12. by removing SP043 on the basis that SP043 cannot be developed to the boundaries you are including when claiming its 'Highly Enclosed'. In reality you will never be able to utilise any of the boundary beyond Dibbendsdale Nature Reserve or the Public Right of Way which removes well over 75% of the boundary you are currently including to make the site 'Highly Enclosed'</p> <p>Areas of SP043 that cannot be developed include Dibbendsdale Nature Reserve, a Public Right of Way, Grade II listed buildings, Ancient Woodlands, Established hedge rows and trees containing protected wildlife and the area set out in Initial Greenbelt review, Appendix 5 Core Biodiversity.</p> <p>By using the Boundary of an area that clearly cannot be developed you are incorrectly stating the developable area of SP043 is 'Highly Enclosed'. I object to you making this assessment and request you amend and update all supporting evidence accordingly.</p>

DOR REF	RESPONSE
	<p>I am concerned that if you don't correct this mistake it will lead to the removal of SP043 (and ultimately the creation of Sp043b) using incorrect information. Please can you amend accordingly and provide an outline of proposed sub parcel SP043b (the parcel that may actually be developed on SP043) taking the following into consideration:</p> <p>1a. The much smaller area of land (which will could potentially become SP043b) that may be developed only represents about 15-20% of SP043 and is by no means 'Highly Enclosed' (cross reference to SHLAA 1930, 'poorly enclosed') please can you clarify the correct the boundary of parcel SP043b so that it only includes developable land.</p> <p>1b. Appendix 5 Core Diversity Map clearly shows the part which is not shaded that could become SP043b. This area spans the established tree line West of Venables Close leading South to Vineyard Farm access track where it then leads South West towards Poulton Road. This is the only area developable on Sp043 and is not 'Highly Enclosed'. Please can you clarify the Urban enclosure (%) of SP043b and provide a clear outline of SP043b.</p> <p>2. Objection to Inclusion of SP043 (SHLAA 1930) due to being previously submitted by landowner</p> <p>2a. SP043 was submitted by a developer over 30 years ago, I object to its inclusion as not only is it a long time ago but the proposal was previously rejected by WBC. For my records please can you provide the details of why SP043 (SHLAA 1930) was rejected for development previously?</p> <p>2b. Please can you also clarify why, given the reasons why it was rejected it has managed to find itself on your initial assessment list? I request you remove SP043 based on the previous rejection information for SHLAA 1930.</p> <p>3. Incomplete Consultation information available to assess evidence provided</p> <p>3a. There are several pieces of information unavailable as part of this consultation. As such I request the consultation period is extended to allow for these important pieces of evidence to be adequately assessed (6 weeks) once approved and available. Most specifically:</p> <p>i. An up to date flood risk assessment (ref section 4.8 of Initial Green belt review Background Report).</p> <p>ii. A Transport Assessment (ref section 4.9 of Initial Green belt review Background Report).</p> <p>4. Objection to assumption made in section 5.4 of Initial Green belt review Background Report</p> <p>4a. For the reason stated within 1 above, I object to you claiming within section 5.4 Green belt purpose 1 & 2 'appear to allow for an objective and measurable differentiation between individual sites because you are not comparing the actual boundaries that you will later propose for development. This is extremely misleading and does not objectively assess sites against each other, for example SP043 which cannot have the boundary you are using in your assessment is being compared against / with sites like SP051, SP050 and SP049 which have clear defined boundaries that will not change due to any restrictions like that of SP043. For this fundamental and very important reason I object to you assessing sites in this way and request you look at a fair objective and measurable differentiation technique. Please list what other measures you have to compare. As a suggestion, could you use actual percentage of developable land per site?</p> <p>5. Table 4 Sites recommended for further investigation fails to include the correct area that could be developed as it quotes 215 -323 Dwelling capacity for SP043. Using the correct area of SP043b taking the above corrections into account please update and provide the new figures.</p> <p>5a. There are also key features missing that cannot be developed and must be included in the notes section. Grade II listed farm buildings. The area defined (shaded) within Appendix 5 Core Biodiversity. The Public Right of Way that crosses the site.</p> <p>5. There was no consultation regarding your new proposed Greenbelt boundary? What other options did you consider? Why not use the A5137 as a strong boundary? This way you don't have issue with DNR or Eastham Country park. I don't not agree to using the M53 as a greenbelt boundary and request to see the alternative options you have.</p> <p>6. Incorrect / misleading information within table 4 of Initial Green belt review Background Report.</p> <p>6a. Table 4 Dwelling capacity is not aligned with actual area that has potential for development. This information is misleading and must reflect that actual developable capacity of SP043 (Proposed SP043b)</p> <p>7. Disagree with statement within section 6.7 of Initial Green belt review Background Report. This figure is misleading and incorrect as many sites even if released cannot be fully developed. This needs correcting to the actual figure possible from all sites using only the land parcels actually developable. Please provide an update to this figure as it will have significant impact on the number of sites you need to release from the greenbelt and will significantly change your strategy for proposing the M53 as a greenbelt boundary. You will have to include more sites beyond the M53 to meet anything like the number you quote once you have considered the developable parcels of sites proposed.</p> <p>8. Incorrect information Appendix 3 Greenbelt parcels Initial Data</p> <p>8a. Incorrect Purpose 1 assessment. You cannot use a boundary that you are not able to develop? This is very misleading and result in an unfair bias to sites like Sp043 which can never be developed to the boundaries you are including in your assessment. This must be corrected. Please correct and provide updated information.</p> <p>8b. Purpose 2, this is not correct for Sp043 appears to be for another Site?</p> <p>8c. Purpose 3 is incorrect, removing SP043 is encroaching on the greenbelt. You have assumed that 'other sites have been released that are currently part of the greenbelt. I object to you assessing SP043 removal as not being encroachment under Purpose 3. Provide full substantiation for your assessment.</p> <p>8d. Purpose 5. The site has a grade II listed building on it, it cannot be recycled? You do not meet this purpose as the site has nothing to recycle and does not regenerate anything? Please amend or</p>

DOR REF	RESPONSE
	<p>provide full justification for your scoring. I disagree with your assessment of SP043, how can it be demonstrated it meets Purpose 5?</p> <p>9. Appendix 4 Green belt parcels initial containment analysis is misleading and unfair, as SP043 can only be partially developed. This information cannot be used to claim SP043 (for development purposes) is Highly Enclosed. You must be clear what part (SP043b) is potentially going to be developed. SP043b is poorly enclosed as such I object to you using this as a basis to release SP043. You are not Objectively assessing measurable differentiations of sites as your measurable (boundary length) does not reflect where sites can actually be developed upto. This needs reassessing using a fair objectively measurable parameter that isn't subject to these types of deviations. Provide evidence of fair measurables proposed.</p> <p>10. Appendix 5 Green belt initial separation analysis is incorrect for sp043.</p> <p>10a. clearly wrong, SP043 is within SA8 and is on the Edge of SA4. please amend and provide updated version</p> <p>10b. This would clearly reduce the separation between SA8 and SA4 the Notes need completely revising. Please provide updated evidence within consultation period.</p> <p>11. Appendix 6 Green belt initial separation commentary is incorrect for sp043.</p> <p>11a. SP043 is within SA8 and is on the Edge of SA4. please amend and provide updated version</p> <p>11b. This would clearly reduce the separation between SA8 and SA4 the Notes need completely revising. Please provide updated evidence within consultation period. This clearly reduces the separation distance between SA8 and SA4. This needs correcting as it is a significant error.</p> <p>12. Appendix 7 Greenbelt initial constraints Analysis appears to show the correct percentage of CBA, this must be accounted for in any sub parcel (SP043a) you create.</p> <p>12a. WeBS Count Area information missing. Consult with Dibbensdale Nature reserve Park Ranger and ensure assessment is completed. there are numerous parts of SP043 that include wetland birds. Provide survey when completed and ensure it is included in Appendix 7 Greenbelt initial constraints Analysis.</p> <p>13. Appendix 10. 1930 appears to go some way to describe the true part of SP043 that is developable but is still wrong. Also note it is defined as 'Poorly Enclosed' this is another reason why I object to you quoting and presenting SP043 as 'Highly Enclosed' Please rectify and align to the correct information taking into account Appendix 5 Bio Diversity.</p> <p>14. Appendix 11 SHLAA Initial separation analysis. 1930 is part of SA8 and edge of SA4, Areas Affected SA8 and SA4 not listed. Amend and provide update.</p> <p>15. Appendix 12 Green belt SHLAA Initial separation commentary.</p> <p>16. Appendix 13. Greenbelt SHLAA initial constraints information is incomplete. Flood zone information needed from assessment. Biodiversity figure is lower than actual data. Please amend and provide updated information.</p> <p>17. Appendix 20. Map of highest accessibility. What is this trying to show exactly? Appears that SP043 Diddensdale Brook is Highly accessible along with the railway line? Yet the public footpath isn't? please can you explain what this is for and how you are using it to assess sites.</p> <p>18. Summary of initial Green belt Assessment for Public Consultation is incorrect for SP043</p> <p>18a. SP043 includes a description stating the site is highly enclosed. For the reasons stated above in 1. I object to this statement being made. I also object to the statement it may be at risk of flooding. This is a known Zone 3 flooding risk area. It floods every year, there is no question regarding flooding risk to suggest otherwise would be misleading.</p> <p>18b. Disagree with Statement SP043B equates to 21.51ha. This is not correct you need to update and exclude all of the Bio diverse area as shown in your Bio Diversity Map Appendix 5. Please update and provide a copy during the consultation period.</p> <p>18c. Object to the use of 323 dwellings as you have not assessed that actual developable area of SP043. This is highly misleading as in reality the number of ponds, woodland and SSSI sites will reduce this figure considerably. It is unreasonable to use this figure as it misleads reader to believing the site has far greater potential than it actually does. I request you move this number as it serves no purpose other than to mislead.</p>
DOR00624	<p>I'm writing in support of Claremont Farm to stop planning permission being granted to build on this green belt land when other places are available in Wirral.</p> <p>The [farmers] have farmed this land and produced good locally sourced food for generations. They provide a good service and low food miles and decrease the carbon footprint of the area, if the owners are given permission to build it will have the opposite effect. Please think about what is being proposed and the effects it will have.</p>
DOR00625	<p>As a resident of Thornton Road I wish to inform you of my objection to the release of Green Belt land on either side of Lever Causeway and Mount Road towards Storeton. Release of this green belt land will fundamentally change the character of the area and will result in Bebington and Storeton merging. There would be a substantial detrimental visual impact on the views that we enjoy across to the Welsh hills. There would also be an increase in traffic and major congestion which we already experience during rush hour coming from Heswall/Gayton/Irby/Pensby traffic.</p>
DOR00626	<p>I would like to register my formal objection to the Wirral Borough Council proposal to build on Wirral's Green Belt under the Local Plan.</p> <p>Having attended the consultation meeting at Pensby School on 12th September 2018, it was very clear to me how strongly the audience almost unanimously felt that this proposal was fundamentally flawed and unjustified.</p> <p>I wish to record the following comments and questions:</p> <ol style="list-style-type: none"> 1. First of all, I question the fundamental premise of the Plan's housing target. What is the justification and rationale to build 12,000 homes over the next 15 years? I believe that that Wirral's population trend is downwards? It was indicated at the meeting that WBC agreed that the target figure is not justified. WBC must challenge the Government's figures.

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	<p>2. There is space for 18,000 houses on Brownfield sites on the Wirral, which is more than is required to meet the target, but obviously most developers don't want these areas as their profit margins would reduce. WBC needs to tell developers that if they want to build houses on the Wirral, then there will be restrictions - take it or leave it.</p> <p>3. In the Plan Review presentation on Wednesday, there was no mention of social housing or affordable housing. Has WBC identified the needs for different types of housing stock e.g. social and affordable housing, housing for single people or single parents, suitable (sheltered) housing for an increasing elderly population?</p> <p>WBC stated it would be targeting housing development in Area 4 (West Wirral), as house prices were higher in this area. Presumably this is to encourage developers and builders to take on building schemes that will make them more profit. But isn't this very unlikely to result in the right balance of different housing stock that will be required? A more holistic approach is surely needed.</p> <p>4. On a related point, I object to the revelation that developers and builders have been apparently allowed to "cherry pick" the "best" development sites from the general proposed Green Belt areas that WBC has identified. WBC should be leading the process totally.</p> <p>5. There are many unoccupied houses in Wirral. It was stated that WBC was trying to bring these back into occupation. I argue that this should be made a much greater priority over building on Green Belt.</p> <p>6. Further development of Green Belt land will add to congestion on already congested side roads, more children requiring schools which are over-subscribed already, and greater pressure on local doctors and surgeries. It is already getting more difficult to make a GP appointment.</p> <p>7. Peel Holdings has stated it plans to build 13,000 homes in Wirral Waters, albeit over a longer time-scale than required for the Local Plan. WBC needs to put stand up to Peel Holdings, add more pressure on them to build the proposed dwellings in good time. Residents and Council Tax payers will not be happy at the perception that a wealthy private property company appears to be pushing WBC around, while stating they also need financial assistance with the Wirral Waters development. I assume Peel Holdings conducted Due Diligence when they acquired the land, so any development costs should be at their risk.</p> <p>8. More traffic will add to pollution and increase in accidents.</p> <p>9. If you sacrifice Green Belt land, we will lose the habitat, the farm land, the flora and fauna. This at a time when the environmental pressures on our wildlife are under greater pressure than ever.</p> <p>10. A couple of specific comments regarding my immediate area in Heswall.</p> <p>+ Barnston Road floods regularly between Acre Lane and Storeton Lane. Building on the fields adjacent to this stretch of road is going to exacerbate the flooding.</p> <p>+ The A540 is the main North - South arterial route in West Wirral. There are traffic jams in my area already, for example in the centre of Heswall, at Gayton roundabout, at Clatterbridge roundabout, at the Arrowe Park Road/Woodhouse Road junction. These problems continue down the A540 towards Chester at various crossroads and pinch points. These are just examples. New housing will only increase the congestion and associated pollution on these already grid-locked roads.</p> <p>I could go on! I beg WBC to reconsider the Plan urgently. Once the Green Belt is lost, it is gone forever - long after our elected officers have moved on and cannot be held to account.</p>
DOR00627	<p>As I am sure you are aware many of the areas proposed for development within the plan, particularly those which form part of the Green Belt release options may be considered to be functionally linked to at least one of the Special Protection Areas (SPAs) which surround the Wirral, these SPA's are:</p> <ul style="list-style-type: none"> • The Dee Estuary; • Mersey Narrows and North Wirral Foreshore; • Mersey Estuary and; • Liverpool Bay <p>The RSPB believes that it can be said that for certain species including pink-footed goose (<i>Anser brachyrhynchus</i>) that areas of the Wirral may be functionally linked to designated and non-designated sites which meet the criteria for international designation including:</p> <ul style="list-style-type: none"> • Ribble and Alt Estuaries SPA; • Martin Mere SPA and; • The Simonswood Moss Roost (near Kirkby) <p>Satellite tracking data from Náttúrustofa Austurlands (East Iceland Nature Research Centre) hosted by the Wildfowl and Wetlands Trust (WWT) on pink-footed geese has shown clearly how all of the roost areas and Special Protection Areas (SPA's) within the North West are linked together, with birds moving freely between them and suitable feeding areas on agricultural land. It is clearly stated within the Initial Review of Green Belt – Revised Methodology that the Council is yet to identify areas of functionally-linked land, this text is shown below: - EUROPEAN SITES AND SUPPORTING HABITAT</p> <p>The Council has an additional legal duty to protect European Sites designated for their international importance for nature conservation. This protection extends to functionally linked land located outside the designated area that may also contribute to the support of the species within them, including off-site roosting, breeding and feeding habitats for qualifying species.</p> <p>As areas of functionally linked land have not yet been formally identified in Wirral, the initial high-level assessment will, at this stage, be based on the Core Count Areas for the Wetland Bird Survey</p>

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	<p>shown in Appendix 6".</p> <p>The RSPB believes that this initial high-level assessment to be inadequate, not least because WeBS Core Count Areas have not been excluded from the final list of areas proposed from development. Further we are concerned that in defining these areas Wirral Council (the Council) has failed to take account of the ecological network mapping that was published by MEAS in 2015, this mapping comprised four components but the Council has used only one, Core Areas, and these like the WeBS Core Count Areas have not been excluded from the published list of sites. As this is the case, the RSPB would like to understand what methodology the Council will be employing to adequately identify functionally linked land. Plans or projects which may impact upon a European designated site (SPA/SAC) or Ramsar site are subject to Habitats Regulations Assessment (HRA) in accordance with the Conservation of Habitats and Species Regulations 2017 as amended ('the Habitats Regulations') and Article 6(3) of the European Habitats Directive.</p> <p>The HRA process requires competent authorities (in this case Wirral Council) to have adequate information so as to determine that any local development plan (or subsequent planning application submitted to them) will not affect the integrity of any European or Ramsar site by compromising the conservation objectives of that site.</p> <p>This includes possible impacts on nearby land outside the designated site boundary which is used by qualifying interest species in significant numbers. Such areas are referred to as 'functionally linked' land and typically include farmland close to estuaries, such as that within Wirral.</p> <p>Survey Recommendations. - As a minimum the RSPB expects the Council to undertake the following surveys to inform the next version of the plan:</p> <ol style="list-style-type: none"> 1. Desk Study 2. Wetland bird habitat suitability appraisal 3. Field Surveys (covering at least one full calendar year) comprising: <ol style="list-style-type: none"> a. Wetland bird counts (high tide counts) b. Targeted Vantage Point (VP) surveys <p>We would expect the full methodology to be consulted upon prior to commencement, we recommend inclusion of the following consultees:</p> <ul style="list-style-type: none"> • Natural England; • RSPB; • Cheshire and Wirral Ornithological Society (CAWOS); • Merseyside Environmental Advisory Service (MEAS) and; • Cheshire Wildlife Trust / Wirral Wildlife <p>Final methodology will have to be agreed with Natural England, the RSPB would only expect these surveys to be undertaken on and around those areas identified for development within the Draft Options Review, we recommend a minimum 'survey buffer' around the development allocations of 600m.</p> <p>The field surveys (wetland bird counts) must include the period the full high tide period (2 hours either side of high tide) and must include nocturnal surveys undertaken using appropriate night vision equipment. We recommend that the BTO WeBS methodology¹ may be suitable for these surveys.</p> <p>Obviously in relation to the SPA's the surveys are most important during the autumn passage, winter and spring passage periods and therefore nocturnal surveys must be undertaken in each of these three periods. The RSPB considers the key months for surveys of these three periods to be September to May inclusive, we recommend that at least one survey per month be undertaken so as to align with the BTO WeBS counts locally, and that the SNH VP survey methodology² updated in 2017 may be suitable for targeted VP's. The Draft Options Review in relation to the National Planning Policy Framework 2018</p> <p>It would appear that some of the published sites have the potential to cause serious harm to designated sites, both those already identified above and those locally designated, therefore the RSPB would like to understand how the Council intends to meet the requirements set out in the recently published NPPF 2018, specifically those related to conserving and enhancing the natural environment relates to sustainable development.</p>
DOR00628	<p>The area defined on the proposal (SHLAA0708) was jointly held, under a legal trust document, by six adjoining properties. The trust was set up in 1958 to maintain the area as a natural habitat and to protect the views and, by default, the value of the properties owned by the trust members.</p> <p>You indicated that, if the land would not at any time be available for development, it could potentially be removed from the proposed Wirral Local Plan.</p> <p>I have been in contact with all members of the "Lower Field Trust" and can confirm that they have, without exception, confirmed that they would not and will not in the future consider releasing the land for development. If required I am available to discuss our below request in greater detail and can provide written confirmation from all members confirming their views together with a copy of the trust document. In the light of the members resolution we would be grateful if you would remove the land defined as SHLAA 0708 from the Local Plan</p>
DOR00629	<p>What is the point in having a green belt if you plan to build on it? Was the original decision to have green belts wrong? Prove it. What has changed to create justification to build on green belts?</p>
DOR00630	<ul style="list-style-type: none"> • the figures need to be questioned for how many houses we really need to build in Wirral to meet our own particular demands, not those set by central government

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	<ul style="list-style-type: none"> the fact that Wirral is unique in its situation, it is like an island with water on three sides, we can't expand outwards to meet unrealistic numbers of houses and neighbouring county councils aren't prepared to support home building from Wirral in their areas a Local Plan delivered with integrity and honesty should be protecting the character of historic towns and villages, helping prevent urban sprawl and safeguarding the countryside, not threatening it there are available sites that can be used in Wirral, for example land that has already been granted planning permission, and brownfield land that is earmarked for both housing and industrial development in Peel Holding's Wirral Waters scheme. I firmly believe that Wirral Council needs to be looking at this with courageous, far-reaching, wide-ranging ideas, looking beyond the obvious quick fix of using 'easy, ready to build' land which will meet dubious targets. Once our historic fields, paths, hedgerows, wildlife etc. are gone, they will be gone for ever. I'd like to see creative thought and innovative solutions to do more with what we already have, rather than thinking of easy, short term options, using honest power and persuasion to come up with brave plans that really do safeguard the unique mix that is Wirral and benefits all its residents and visitors. Our green fields and everything that lives and survives and benefits from them can't shout out for themselves, they can't put up barriers and protect themselves. All we can do is speak for them and say, 'please use what we already have to meet realistic housing targets, and don't take the easy option and destroy what can never be put back again'.
DOR00631	<p>If you change the land usage to mixed use including housing you will not have a Civic Centre at all. The community will have lost a valuable asset.</p> <ul style="list-style-type: none"> Allport Lane Car Park, Bromborough (SHLAA 2025) <p>Bromborough village is a thriving village with 71 businesses employing over 500 people and is unique in its situation on Wirral. It stands less than a mile away from Wirral's premier retail park, the Croft Retail Park, with its retail outlets, leisure facilities, restaurants and crucially, acres of free, all-day parking bays.</p> <p>Bromborough is a historic town with a conservation area at its heart and a popular and thriving commercial centre with a diverse range of local shops and businesses together with four high street banks, a number only surpassed by Birkenhead and West Kirby on the Wirral. People come to Bromborough not just to shop but for business, both personal and commercial. They need to come to Bromborough - but they need a carpark. In order to compete with The Croft, we need to do so on level terms - we must have adequate, free parking. There is some time limited on street parking but the majority of the parking is in the Allport Lane car park. This car park is well used demonstrating the value people from a wide area put on the businesses in the village as well as the Civic Centre. If you change the land usage of the car park to mixed use including housing you will not have a car park at all. Without parking the businesses in the village as well as Bromborough Civic Centre will soon die as it will be too difficult or inconvenient to access them. Parking in neighbouring streets will cause a nuisance to local residents and is not a sustainable long term option.</p> <p>Conclusion- I hope that in response to these representations the Council will remove the proposed change of use for these two community sites from that currently to mixed use including housing.</p> <p>[Site plans received as part of response]</p> <p>Reasons for my opposition and suggestions for further work</p> <ul style="list-style-type: none"> Housing need, out of date data and methodology <p>The basis for the projected housing target of 800 homes per year is based on old data and not the most recent Office for National Statistics data issued in September 2018 that a dramatically lower figure of 500 homes or less per year would be needed. The Council needs to completely re-evaluate the housing needs for Wirral taking into account the historical population and household numbers and trends, the recent lack of economic growth and the uncertain economic prospects for Wirral following BREXIT.</p> <p>The Council needs to challenge the Government's housing targets for Wirral arguing that there is compelling evidence to adopt an alternative approach to the calculation of housing needs. This will dramatically reduce the anticipated housing needs for Wirral to a much lower figure.</p> <ul style="list-style-type: none"> Home types, Council borrowing cap, brown field sites and Peel Holdings <p>The Council should prioritise the construction of social, starter and affordable homes on a brownfield first basis. The government has recently announced a lifting of the borrowing cap on local authorities for social house building. The council should fully explore the possibility of building much needed social housing on brown field sites. Where these sites are owned by a reluctant land owner the council should consider compulsory purchase. I have in mind Peel Holdings in particular.</p> <ul style="list-style-type: none"> Green Belt Boundaries <p>I do not agree with your proposal that the M53 Motorway should be a high level strategic boundary.</p> <p>For land to the east of the M53 motorway, the current green belt boundaries which run along Prenton Dell Road, Pine Walks, Mount Road, Brimstage Road, around the Poulton estate to Brotherton Park and then south along the Dibbinsdale stream in Plymyard Dale to Eastham are the readily recognised boundaries and should stay so.</p> <p>Much of the M53 motorway from Eastham to Clatterbridge is in a cutting and, in my view, is not a recognisable boundary. It would be wrong to include the open countryside to the east of the M53 motorway for further investigation using the rational that the motorway is a natural boundary or that the land is highly enclosed.</p> <p>I believe to do so would be contrary to your stated aim of:-</p> <p>Sites in the open countryside, which are not already highly enclosed or which would reduce the separation with an adjacent urban Settlement Area have not been identified for 'further investigation'.</p> <p>[Map of Proposed Green Belt Sites for Further Investigation attached]</p> <p>If the Council is partly or wholly successful with its proposal then the next step would be for developers and landowners to come forward with their proposals. I have a fear that pressure would be</p>

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	<p>brought by those living to the west of the M53 to have any new development in areas to the east of the M53 and not in their area. I would find this completely unacceptable.</p> <p>In my view there needs to be fairness in bearing the burden of future development on ex Green belt land across the different areas of the Wirral with priority being given to Brown field sites</p> <p>In conclusion, I don't believe the Council has made the case that "exceptional circumstances" exist to justify changing the existing Green Belt boundaries. We owe it to our children and grandchildren that the green belt countryside we have enjoyed will be there for them as well. Once the green belt is gone it is gone forever</p>
DOR00632	<p>It is unclear why at least 14 of the possible options would very likely result in significant harm to either SSSIs or Local Wildlife Sites when the NPPF paragraph 175a clearly states that the mitigation hierarchy should be followed and permission refused if significant harm would result. Furthermore, the NPPF specifically states that sites of biodiversity should be 'protected and enhanced' (paragraph 170a and paragraphs 171, 174a, 174b).</p> <p>Failure to take the network into account undermines the objectives of network mapping. The NPPF is unambiguous - planning policies must take a 'strategic approach to maintaining and enhancing networks of habitats' (NPPF paragraph 171 and paragraphs 170d, 174a, 174b).</p> <p>It is evident that several of the proposed options would directly impact or sever the mapped ecological networks including some core areas. This is unacceptable and it is essential that a map of the complete ecological network is included in the Local Plan and used to inform decisions relating to the different development options.</p> <p>Embedding an 'environmental net gain principle for development, including housing and infrastructure' is the overarching aim of the 25 Year Plan for the Environment (Michael Gove 2018, Chapter 1 Policy 1). Guidance on achieving a measurable Net Gain for biodiversity is clearly set out in paragraphs 174b, 175d of the NPPF. Further guidance is also provided in paragraphs 118a and 170d.</p> <p>The inclusion of areas of high wildlife value (which may also be non-designated areas such as those important for ground nesting birds) within development options means Net Gain would be very difficult or impossible to achieve unless large tracts of land are set aside for the purpose of biodiversity offsetting. By including high value areas (which also conflict with other planning policies as set out above) the Net Gain requirement is likely to make the development of such areas economically unviable. It should be noted that developing in close proximity to areas of high biodiversity value is likely to result in measurable indirect impacts that will also require compensation under the Net Gain requirements. Significant areas of buffering habitat would be required to prevent indirect impacts.</p>
DOR00633	[SAME AS DOR00455]
DOR00634	<p>Subject: Land at Vineyard Farm, Spital, Wirral – Council designation SP043</p> <p>I am writing to you to express my concern that your company has undertaken surveying of the above land during the past week. You will be aware of the backlash of public opinion regarding Wirral Council's proposal to release land currently designated Greenbelt. The Council is undertaking public consultation regarding its proposals; the deadline for which is the 26th October 2018. I therefore find your onsite activity particularly insensitive in regards to timing given that the land remains Greenbelt and consequentially forms part of the consultation process.</p> <p>I assume (?) the work has not been undertaken as a result of any prior discussion that your company has conducted with Wirral Council?</p>
DOR00635	[SAME AS DOR00455]
DOR00636	<p>I understand the Government requires the Wirral area to provide an additional 12,000 new homes to be built by the year 2033, and that there is not enough brownfield land for this purpose. How much brownfield land is available and how many homes might this provide? Once this figure has been identified, the remaining homes should be provided by Wirral Waters' dockland redevelopment. We must preserve and protect the present green belt land from any future and current development. Many of the present sites submitted by landowners and developers [Appendix 3] should be carefully scrutinised, and only those that do not come from Core Biodiversity Areas [Appendix 5] and High Quality Agricultural Land [Appendix 7] should be seriously considered for development. Areas marked as Flood Zones [Appendix 4] should be rejected. All Wirral councillors should, after proper consultation and evaluation, fully support the Wirral Waters regeneration plan for the Birkenhead Docklands area, which will provide all the remaining required homes, thus leaving Wirral's various green belt areas as 'lungs' for the people resident in the Wirral to protect their quality of life.</p>
DOR00637	<p>There is insufficient evidence that this amount of land is required for building in this area, the position of which is of outstanding beauty with its views of the Welsh hills.</p> <p>The council has in no way explored the use of brown-field sites within its jurisdiction for planning permission, simply because it is easier to build on virgin green belt and therefore more profitable to the council. This land is not YOURS to sell, you are simply custodians of it for the community.</p> <p>Please remember that you can only sell off the family silver once!</p>
DOR00638	[SAME AS DOR00455]
DOR00639	There is the need for new homes in Wirral and this site should be considered!
DOR00640	I am writing to voice my concern at the amount of land you plan to use in Eastham. Having over estimated the number of houses you needed to build to comply with Government guidelines - perhaps you could reconsider. Trees and open spaces are needed for wild life and to dissipate the air pollution. Please protect the environment.
DOR00641	[SAME AS DOR00455]
DOR00642	[SAME AS DOR00455]

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DOR00643	<p>My reasons for this are as follows:</p> <ul style="list-style-type: none"> • There is sufficient land in urban areas to build upon. • The population projection does not warrant for 12,000 houses. • It will spoil the character of the area. • The greenbelt areas provide an area for relaxation and exercise for innumerable local residents as well as wildlife. There are bats, owls etc living in the land at 41 Thurstaston Road. • Unrivalled views will be destroyed, irreparable damage to its setting, and causing a devaluation in the value of our homes. • Increased traffic and major congestion – children getting to and from school is hazardous already. • Acres of prime agricultural land will be lost. • Increased flooding at [address] – it already floods so reduced drainage will undoubtedly make it worse. • Use Wirral's already empty 5,000 properties and the already existing space on brownfield sites for 18000 homes. • Parking in Irby Village is already difficult. • Getting a doctor's appointment is not always possible without a significant wait. • Schools are oversubscribed as they are.
DOR00644	<p>I am lodging my objections to the proposed release of green belt on The Wirral. The basis for this is listed below do not just delete this email and count is as a generic objection and as agreed by your repress native at the consultation meeting I will expect an acknowledgement.</p> <ol style="list-style-type: none"> 1.) There is sufficient land in urban areas to build upon. 2.) The population projection does not warrant for 12,000 houses. 3.) It will spoil the character of the area. 4.) The data used is flawed and no common sense has been used to question the calculations for the housing need. 5) no thought has been given to infrastructure to support new communities...hospitals, schools, waste production etc. 6) Wirral boasts a beautiful mixture of town and country which is home to rare and beautiful wildlife. This eco system is delegate and should not be disturbed. <p>We must use the Wirral's already empty 5,000 properties and the already existing space on brownfield sites for 18000 homes.</p> <p>As the Council Leader said on TV at the recent giants event Wirral is a beautiful place...don't be stupid let's keep it that way and develop the areas crying out for investment that boast unrivalled views of Liverpool water front.</p>
DOR00645	<p>Having attended a meeting at Irby this evening and listened to various councillors and speakers, it would appear there are approximately 4,600 empty houses on Wirral and 6,000 potential spaces for housing at Wirral waters. A total of 10,600. Why therefore is the council even contemplating building on greenbelt land?</p>
DOR00646	<p>I am writing to record my objections to the proposal to build on Green Belt land in Eastham Village and surrounding areas. Eastham is a very pleasant place to live. If the proposed land is taken over with industry and housing this unique area will be lost for future generations. Residents of Eastham have chosen to live in this area partly because of the green areas, woodland, parks and river front. Wirral Council have no need to build on Green Belt because there are thousands of abandoned properties in Wirral that could be sold or rented rather than build more houses on any piece of green land that is seen to be available. I remember some time ago reading of a law enabling councils to take control of empty unsold homes, refurbish and then rent out for five years before being handed back to the owners. I would be interested to know how the figures are ascertained for the Council to decide how many properties should be built. Eastham will soon have 21 houses to be built on St Anslem's field. Would the granting of planning permission have any bearing on the Council having the use of the new club house to use? Wirral seems to have a policy of 'If it is green, build on it.' Building on Green Belt must stop. The Council are proposing to go against the policies of the meaning of Green Belt. Wirral was once promoted as the Leisure Peninsula. Not any more, if MBW gets its way it will be the Greenless Peninsula.</p>
DOR00647	<p>I am strongly opposed to any plan relating to the demolition of the civic centre and library for building purposes. The centre is used every day by local people for all sorts of activities. I use it every week and have done for years. There is no other community building as large or as central in Bromborough for people to use. The library opening hours have already been reduced which is a disgrace. This action will have a detrimental effect on the village and should not occur.</p>
DOR00648	<p>We wish to object strongly to any further investigations into the land referenced here, and object to the intention to develop this land in future.</p> <p>Impact on landscape - The proposed development would be a negative impact to the local environment landscape which is open and supports biodiversity and wildlife in the form of badgers, bats, and birds. All type of animals exists on the proposed development sites. These statements refer to multiple objections made to developments proposed on Pipers Lane in the past by the Wirral Wildlife and Merseyside Environmental Advisory Service, specifically referring to bat roost potential, conditions to protect badgers, and conditions relating to breeding birds</p> <p>Light pollution - The proposed development would increase light pollution. Currently there are no street lights past [number] Pipers Lane to the west, and the area is therefore naturally dark.</p> <p>Developing the end of the lane would increase light pollution having a negative impact to current residents and wildlife. Road issues, i.e. traffic generation, vehicle access and road safety - The</p>

DOR REF	RESPONSE
	<p>proposed development would increase traffic volume on Pipers Lane. Pipers Lane is not capable of handling even a small increase in traffic due to numerous single carriageway sections, with road widening not possible along the length of the lane. Furthermore, there is no pavement, and no opportunity to provide a pavement in many places. This further increases the road safety risk to pedestrians and the many recreational users, families, and dog walkers using Pipers Lane to access the Wirral way. Traffic congestion is an existing issue on Pipers Lane with the current volume of traffic navigating the numerous narrow pinch points. Pipers Lane is the only access to Bush Way, Crossley Drive, Sandfield Park, Warren Way, Pipers Close, The Pipers and Redstone Drive. The quality of the road surface and infrastructure (many potholes, sinking road surface, minimal/limited street lighting) also do not support any increase in traffic. Considering the main access to Piper's Lane to be Delavor Road (the other option being Oldfield Drive, which is an un-adopted road in a bad state of repair), there are also road safety concerns at the junction of Delavor Road to Thurstaston Road and Dee View Road, which is a dangerous junction without clear right-of-way. An increase in traffic volume would also increase noise and disturbance to residents and wildlife. Pipers Lane is not amenable to public transport to service the increased volume of residents. Capacity of infrastructure - The proposed development would stretch capacity of infrastructure, such as road drainage systems, as currently the road floods in many places during heavy rain. The number of schools, especially high schools, of which Pipers Lane is in the catchment area of is very limited. There are 4 primary schools and 2 high schools within reasonable distance, and an increase in the volume of residents will either require additional schools or increase the intake numbers in future years, to the detriment of our children's education. Layout and density of building - SP058E indicates space for 62 dwellings (referring to option 58.4 detailed in the Summary of Initial Green Belt Assessment September 2018). This density of dwelling is out of character with the surrounding area and will have a negative visual impact as viewed from Wirral Country Park.</p>
DOR00649	I believe we need more homes which are affordable for first time buyers
DOR00650	<p>My biggest concern, is the infrastructure is not in place to support an increased population in the village - Thingwall Road is incredibly busy and quite frankly, a higher volume of traffic, on this relatively narrow road, will no doubt increase the risk to both drivers and pedestrians. Added to which, you cannot get a parking space in the village so it's something of a bottleneck already. As it stands, it's incredibly difficult to get a doctor's appointment at the Warrens Medical Centre. What will happen when more people are wanting to see a doctor or a nurse? The NHS is stretched to capacity as it is so I can't imagine they'd be given additional funding to cater for the additional patients. The same goes for Arrowe Park Hospital too. My children attend [local] Primary School and this is already oversubscribed. To my knowledge, so is [local] Primary School. With already large classes, I fear my children's education would be compromised if the school had to increase their intake. Again, would funding be available to provide extra teachers and expand the schools? I would be grateful if the council could take the current residents' concerns and opinions into consideration, before destroying the character and aesthetics of the borough.</p>
DOR00651	<p>*Increased traffic and major congestion *12000 houses are not needed. The population project does not warrant this figure *There is sufficient land in urban areas to build on *The character of the area will change forever *Lever Causeway and it's open spaces provide an area for relaxation and exercise for innumerable local residents *Storeton is an historic hamlet which will be directly affected by any building on Lever Causeway causing irreparable damage to its setting *Acres of prime agricultural land will be lost *The proposed destruction of green belt will have a damaging effect on Mountwood Conservation Area as it will destroy its setting *Mount Road's elevated position currently provides unrivalled views across to the Welsh Hills. Any building would have a substantial detrimental visual impact on any remaining green belt. *The sites either side of Lever Causeway are huge. Once released from green belt, building could extend to Storeton, causing unrestricted sprawl, with historic Storeton and Bebington merging</p>

DOR REF	RESPONSE
DOR00652	<p>1. There is sufficient brownfield land on the Wirral to meet the borough's housing needs and green belt should not be utilised until all the brownfield land has been used. Pressure should be brought to bear on developers and landowners such as Peel Holdings to develop out the brownfield sites which they currently own and have planning consents for.</p> <p>2. The release of green belt will result in the creeping urbanisation of the Wirral, making it a less pleasant place to live for everyone. Local villages such as Barnston and Thornton Hough will lose their identity. Also, considering green belt which has existing development on three sides as "enclosed" and therefore to be earmarked for development, is patently flawed, resulting in more urbanisation. A site is not enclosed unless it is surrounded on all four sides.</p> <p>3. Also, considering villages such as Irby, Thingwall and Pensby as one Settlement Area is also flawed. Originally, these were separate villages and previous creeping urbanisation has partly infilled the land between them. However, this is no justification for allowing further infill, to the overall detriment of the area.</p> <p>4. Many of the proposed sites are rich in wildlife, with ancient hedgerows, many bird species, and foraging areas for protected species such as badgers. Allowing development is contrary to the council's obligations to protect wildlife and the natural environment. There are Sites of Biological Importance and SSSI's close to some of the green belt areas proposed for development and this will have an adverse impact on these sites.</p> <p>5. Other aspects such as traffic impact, availability of school places, drainage and flood risk will also require consideration before any further development should take place. Building on greenfield sites reduces the amount of rainfall which seeps into the ground and will result in more instances of local flooding.</p> <p>Finally, the projected housing need is based upon questionable data, as evidenced by the sudden amendment to the number of houses predicted to be required by the ONS. Wirral is a special case in terms of assessing housing and employment needs, as many of the residents do not work on the Wirral but travel to cities such as Liverpool, Chester, Runcorn and Warrington. Therefore it is inappropriate to apply standard nationwide formulae to calculate the borough's future housing needs. Further work needs to be done to confirm the housing need before any important decisions are made about future development. The council should make representations to the government accordingly.</p>
DOR00653	<p>I object to the current Local Plan on the following grounds:</p> <ol style="list-style-type: none"> 1. The housing targets are not justified by existing population growth numbers. 2. The proposed Green Belt sites will have little access to local facilities. 3. There are plenty of empty houses which could be utilised. 4. Halving Wirral's Green Belt will mean an unacceptable loss of green spaces and natural habitat to the community and wildlife. 5. The excessive development will mean that core services will be unable to cope.
DOR00654	<ul style="list-style-type: none"> • I do not accept the need to build on Green Belt land. Independent analysis shows Wirral has a declining population and there are sufficient brown field sites to meet the projected needs of Wirral residents. • The release of Green Belt land will lead to the building of executive homes rather than affordable housing for young Wirral residents and the elderly. Building these houses will lead to an influx from Cheshire West where housing is traditionally more expensive and will put increased strain on already overstretched education, health, transport and social services. The occupants will have little connection to the area. They will work and shop outside Wirral, contribute little to the local economy and be a net loss to the local purse. Any increase in income from council taxes will be swallowed up by the need for a vast investment in the local infrastructure. • The council has a duty to protect the interest of local residents. Release of Green Belt will only benefit large scale property developers at the expense of the health and wellbeing of residents. • There is a distinct socio economic divide between affluent areas to the west of the M53 and poorer areas to the east. The use of the M53 as the boundary of the Green Belt reinforces and increases this divide. It effectively restricts access to green spaces for those living on the wrong side of the motorway and condemns them to increased levels of air and noise pollution. • There is a real need to tackle urban degeneration in parts of the borough. Release of the Green Belt will actively discourage developers from building on brown field sites which are more expensive to develop. • The proposed release of Green Belt has led to pressure from developers on the two principal landowners; Lancelyn Green and Lever Estates, to release farm land for building. This is at the expense of tenant farmers who stand to lose their homes and livelihoods. Farms like Claremont Farm have received EEC funding to develop bio diversity and used this to increase public amenity and access to green spaces. This has been paid for by tax payers and the proposal is to now squander the significant investment for the benefit of wealthy property developers.
DOR00655	<p>I wish to object to the proposals to build on the current greenbelt land in Wirral for the following reasons.</p> <p>The green field sites are isolated with no access to facilities such as shops and regular public transport & will encourage more vehicles on the already congested roads.</p> <p>There is little or no scope or additional finance for the increase of core services such as schools & doctors.</p> <p>The value of the green fields & their location would result in expensive homes being built that are completely unaffordable to first time buyers.</p> <p>The local population growth figures do not substantiate the number of additional dwellings proposed.</p> <p>There are considerable number of empty dwellings in Wirral that could be brought back into use.</p> <p>If the land is built on the loss of biodiversity and public amenities will be permanent and this is a great part of Wirral's character and attraction.</p>

DOR REF	RESPONSE
DOR00656	<p>I am writing to express my disquiet on reading the councils plans for the building of houses on Green Belt land at Riverbank Rd, firstly the council has not taken into consideration the access to this area and the increased pressure it would bring on the only road leading to Riverbank Rd which is Station Rd, Station Rd leads to a blind corner at Village Rd, in fact all the roads leading to Riverbank Rd are inadequate for an increase in traffic and The councils estimate of an extra 45 dwellings would produce an unacceptable increase in traffic, given that most households now have at least two cars each it will increase car traffic to at least 90 cars this is not to mention the increase of commercial traffic extra housing would bring putting an unsustainable increase on the road system.</p> <p>Riverbank Rd is part of the Wirral Circular Trail which attracts pedestrians, cyclists, horse riders and ramblers and outside visitors to the area, added traffic would make this extremely dangerous for these groups. There is also the added pressure it would have on schools and doctors surgeries, which are already full to capacity. Riverbank Rd has magnificent views over the fields to Wales and visitors from all over visit the area for that reason, the council has a duty to protect land adjacent to the Dee estuary for the preservation of protected species. The land on Riverbank Rd can hardly be called infill as it is open to the Dee estuary on one side and open fields on another and there are only a handful of houses at the top of Riverbank Rd, building here would destroy the uniqueness of the area to the Wirral peninsular. It is understood the council has approximately 4500-5000 vacant/empty houses, for what reason has the council excluded these from the figures of 4990 houses needed. The government has now decreed that only an extra 500 dwellings have to be built each year over the next 15 years, therefore only a total of 7500 houses are needed. The Green Belt should be protected beyond the 15 year plan, once this land has been developed the Wirral will not have the unique status it has now has. To conclude the council has said residents must have a say on any future developments and I know many people have expressed their disquiet at the councils plans to destroy Wirral's Green Belt land. I know housing is needed but the council should explore other options such as developing Brown Field land and vacant/empty property before taking the easier option of destroying Green Belt land forever.</p>
DOR00657	<p>1 The Council should use the ONS 2016 projections to recalculate the minimum numbers of dwellings required to the reduced figure of 7320 over the 15 year period.</p> <p>2 Given that development on any green belt land should only be permitted in exceptional circumstances and that there are large areas of land at Wirral Waters which can be developed to meet the need over the fifteen year period I think the Governments requirements can be met without involving any of the Wirral greenbelt</p> <p>3 Turning to specifics:- 3a SP. 071 - This site is largely agricultural land which is actively farmed. Its category is best agricultural land. It forms a very significant buffer between urban Barnston and urban Gayton and is a significant green lung as Chester Road is very busy with high levels of pollution from vehicles. Any development here will increase that. Additionally any additional traffic on Chester Road will add to driving risks on that road which from the signs detailing the numbers killed and injured on the road seem considerable</p> <p>3b SP 105 - Development in Cottage Drive West is complete and it seems absurd to contemplate the area as being reclassified as a potential Infill Village. Any development there would conflict with the Council's stated objective of keeping land between the Wirral Way and the Estuary unbuilt on.</p> <p>3c SP 061 and 062 - It is hard to visualise a more unsuitable area for development which would again use best agricultural land and have the effect of joining up the separate villages and developed areas of Barnston, Pensby and Thingwall so utterly changing the face and character of the Wirral. Of all the proposals I have viewed this seems to be outstandingly the worst.</p>
DOR00658	I wish to register my objection to these plans, particularly in view of the Peel proposals.
DOR00659	<p>The call to build on green belt land is so very short sighted on behalf of the planners . It's the green spaces that are our greatest assets ,this is what makes our peninsular so special and attractive, think of the Wirral of the future as it would be if you had your way. Imagine the Dee side in 100 years looking like Wallasey and Birkenhead, who the devil would want to live there ,even if they were all detached 4 bedroom houses built close to each other as is the necessary current fashion.</p> <p>The area around Bidston dock could I'm sure be made into a very attractive village with low cost affordable homes ideal for first time buyers who mostly work in the built up areas where the employment is based.</p> <p>Any development in greenfield sites will only have upmarket houses affordable to the already established home owners which does not benefit the 1st time buyer. Furthermore property which is on the market isn't being snapped up because of housing shortage is it .</p>
DOR00660	<p>I am deeply concerned about the plans that will completely change the landscape of our beautiful part of the world. Once this land has gone there is no getting it back again, don't ruin the Wirral for our children's futures. We recently moved to Pensby and the main reason was for the greener areas. Where will there be for families looking for this upbringing for their children once it's gone.</p> <p>There are many areas on brown belt that could be developed that haven't been considered, the council have gone straight for the ways they can make lots of money, to sell off OUR green spaces to greedy developers. There are plenty of areas in the likes of Birkenhead that could be developed such as the appalling and failing shopping area with all the empty shops. A suggestion would be to knock the existing area and rebuild a modern shopping centre with housing around. This would boost the shopping and recreation to Birkenhead and release space for housing if the shops were condensed into a shopping centre instead of all the empty shops there are currently, wasting space. The population growth of Wirral doesn't call for the number of houses that have been suggested. There are more than enough empty houses available that could be developed. Please listen to the people who live here, who love this area and don't want to see it changed. I have not met one single person who thinks this is a good, positive plan, surely that tells you all you need to know. The people of Wirral who call this place home do not want this. Please don't ruin the Wirral for our children and future generations to come.</p>
DOR00661	[SAME AS DOR00455]
DOR00662	We need more home in the area

DOR REF	RESPONSE
DOR00663	<p>Whilst I appreciate that you are not my local Councillor I feel the need to inform all Councillors, just how angry and upset I am about the Greenbelt proposals. Please find attached a copy of the letter I am sending in regarding the Local Plan consultation and my objection to opening up the Greenbelt for development. I was heartened to see that motion 3 Keeping the Builders Hands Off Our Farmland & motion 5 New ONS Housing Projections were both carried, however I am despondent to report that today on Farm SP043 there were housing development surveyors out on the fields. I believe that this is one of the most important issue which has faced Wirral for many years. It is heart breaking to think that these areas of nature which are what make Wirral so special are to be dug up and built over, simply to maximise the profits of these big housing development firms, who are simply concerned about their share price and not what is best for Wirral residents. However, it is also a travesty that housebuilding and investment on greenbelt areas, will leave other areas of Wirral such as Birkenhead derelict and abandoned, areas which might I add are already the most economically deprived. I would urge you to vote in line with the voices of the people of Wirral and not be whipped into line by others on these matters. Area SP043 which directly effects my area. I am extremely concerned and object in the strongest terms to this happening. I understand that I am one among thousands of people in Wirral who are objecting to these plans. I have followed the consultation process and the information provided, I object to the timescale that the Council has set. It is well documented that the Council has for many years failed to come up with a plan. However it now seems intent to rush into a plan with a limited 8 week period of consultation with the public and pushing the Greenbelt as being the only realistic and viable option available, which is completely false. The Council website states: The Government has produced a standard method for calculating the minimum number of homes needed in a local authority area. This is based on nationally-published population and household projections. This calculation shows an overall minimum need for new housing of 12,045 new dwellings over 15 years, equal to 803 dwellings per year” ‘Government has told Wirral we must identify enough land to allow for 12,000 new homes to be built in Wirral by 2035’. There is clear evidence that the figure of 12000 homes is vastly over calculated. There is also clearly a gateway for challenging this figure. Much has been made of S44 Planning for the Right Homes for the Rights Places, which provides a gateway for deviation from the Standard Calculation. For Wirral MBC to put out a consultation based on incorrect and unchallenged figures of 12000 homes, shows complete disrespect and contempt for the people that it serves and makes a mockery of what should be a well-informed consultation. Without doubt the population projection by Wirral MBC and the ONS is clearly an exception circumstance to justify an alternative calculation and allow Wirral to deviate from the standard method of calculation which is giving a figure of 800 homes per year. Why the Council has not used this figure as a headline figure with a worst case scenario of 12000 is highly questionable and if the Council fails to challenge the Standard Calculation, it will be failing in its duty to serve the people of Wirral. During the Public meeting on the 10th September Council Officer, stated that there were currently 4600 empty homes on Wirral and that there were concerted efforts to bring empty properties back into use. It really seems that Wirral MBC are paying lip service to this instead of treating it as the priority it should be. If the Council is serious about regeneration and improving people’s lives, having properties lay uninhabitable and abandoned, is likely to increase crime in and around these properties and has a negative impact on the immediate neighbours and the surrounding community. There are areas in Wirral which desperately need investment and support. Diverting investment and support away from these areas is an abandonment of families and communities most in need. I understand the Council has already spent £1 million pounds on the Hoylake Golf Resort which now includes plans to build 160 luxury homes on Greenbelt Land. With additional plans to borrow and then lend the £26 million to the Developer. If the Council was serious about regenerating empty properties and regenerating existing areas of Wirral why is this money not being used where its most needed. Imagine the difference taking £27 million and investing it in these empty properties and the surrounding communities would make to the people who live in and around these areas. I know the Council will claim the £26 million is a loan and will be repaid, however based on the financial ineptitude that Wirral MBC has shown over the last decade (cost of freelance consultants and payoffs for failed Chief Executive) I have grave concerns that the Council will be unable to recover this money and instead it will be another gift to big business at the expense of the people of Wirral. The Council itself should have grave concerns over the (NJVG) past trading history. What’s truly sad is that this all seems to come down to money. If the Council says it’s not then this is a blatant lie. During the meeting with the Head Planner, he described sites with less than 50 units as being ‘challenging’. As in it was difficult to get developers interested as there wasn’t as much profit in them. Ideally they wanted sites of 100 units plus. This was also the stance with brown field sites. It costs too much to prepare these sites which reduces the profitability for the developers. Quite frankly the Council should hang its head in shame, that it is pushing £27 million towards a luxury golf resort, when it could spend this money working with smaller developers and regenerating brownfield sites which as a result would require no greenbelt to be re-designated and developed. Engaging and supporting local builders/business to do this would actually bring jobs into the area. In relation to land designated as brown field sites, I understand there is the potential to build up to 18000 homes. The council puts forward the argument that it is too expensive, and it takes too long to develop these sites i.e. the average compulsory purchase being 18 months to complete. This is surely a moot point on the basis that the Local Plan should have been developed 14 years ago and when the plan is completed and implemented it lasts for 15 years. Wirral Waters have the potential to fulfil the housing needs. Without getting into the mismanagement of this site by Wirral Council, namely the failure to put timescales on the project, there is enough space to build the required housing for the projected population increase (ONS & Wirral MBC data above). The letter by Development Director of Wirral Waters, Peel Holdings specifically states that the Council are making references to the Wirral Waters Project which are ‘misleading and inaccurate’. However other than highlighting the fake information being distributed by the Council leader, the important thrust of the letter is that it is clear there are sufficient development opportunities over the Peel Group Holdings land. Specifically stated the minimum number of units they anticipate are “2900”. The letter goes on to say “With the support and co-operation the Council you lead, we could build up to 6450 in the next 15 years to reach our ultimate goal of 13000 homes. Various Councillors continually state that opening up the Greenbelt is a last resort and their preferred option is brown field sites. If this was truly the case, then based on the figures provided by Peel Group Holdings Ltd, empty homes and additional brown field sites, there is absolutely no need to consider redefining the greenbelt and removing the protection from development. Specifically in relation to opening up the bank of Greenbelt running from Storeton Woods through to Eastham Country Park. Using the M53 motorway as a dividing line between the West side and Birkenhead through to South Wirral, it is clear there are major discrepancies in the life expectancy and health</p>

DOR REF	RESPONSE
	<p>inequalities. It is starkly clear to see that Birkenhead through to South Wirral has been heavily developed compared to the West side of Wirral, bringing increased pollution and the associated health issues that comes with population. Air pollution is a key environmental risk to health, and poor air quality can contribute to ill health, shortening life expectancy and increasing mortality. The Authority monitors various pollutants in various locations in order to build a picture of air quality in the area. Specifically, the report mentions that there are 31 Nitrogen Dioxide monitoring points in Wirral. 27 of these monitoring stations are located on the bank of land running from New Brighton up to Eastham, the same bank of land which has a life expectancy. As I am sure you are aware the deprived areas of the Wirral are predominantly situated in the bank of land from New Brighton up through to Eastham. I would highlight that the Three Stags Crossing is heavily congested especially around the rush hours of schools mornings and workers returning home in the evening. To add further traffic to these roads would be untenable and cause significant health issues for the surrounding areas with the increase in traffic in this area. Removing the greenbelt protection from the Storeton Woods area, through to Eastham Woods, and opening this up for development, is only going to be detrimental to the health inequalities already being suffered by people on that side of the borough. I would also object to the Greenbelt which is prime agricultural farm land being dug up for development. Reducing agricultural land availability completely ignores the issues the UK is facing with the imminent exit from the European Union. While a few fields in Wirral may seem miniscule in the grand scheme of the food chain, they are a vital resource and are surely now more important than ever, with the uncertainty around food supplies. Producing local food whether it to Wirral or to the UK will be a must in the future, whether this is due to exiting the EU or to help reduce climate change. In addition the greenbelt is providing a natural sponge for heavy rains and changing weather patterns in the UK. I'm not against change or improving the Wirral for future generations. What I am against is the opening up of the Greenbelt simply because it's the easiest solution for the Council and the Council boughs to the pressure from housing developers instead of listening to the voice of residents. I attended the Council meeting on the 15th October and was heartened to see 2 of the 3 motions in relation to the Greenbelt and the ONS figures being passed; Motion 3 - Motion 5. However, it is now more important that the actions of the Council take into account the views and feelings of Wirral residents and this will only be seen by all Councillors voting in favour of protecting ALL Greenbelt land. In summary I strongly object when there is clear evidence that there is NO need to release ANY of Wirral's Greenbelt for development;</p> <p>1) The housing target is hugely overstated; 12000 stated, 5923 based on ONS figures 2018</p> <p>2) 4600 empty homes which can be brought back into use</p> <p>3) At least 2900 units on Peel Holdings land, with the potential to build up to 6450 in the next 15 years and an ultimate goal of 13000 homes</p> <p>4) Existing brownfield sites which can, with investment and support, fulfil sufficient housing needs.</p> <p>[NPPF Quoted]</p> <p>[ONS & WMBC figures provided]</p> <p>[ASR Report Quoted]</p> <p>I write to express my continued objections to the option of releasing greenbelt for housing development and raise my concerns about the following: The Councillor wrote "Making sure Wirral residents have a choice of good quality, attractive housing is vital. We've got to have a robust Local Plan so we are able to meet those needs. "We've also got a responsibility to our residents. They have told us, unequivocally, that they do not wish to see Green Belt land developed for housing. We agree, and we have told Government Ministers the same thing. The opening paragraphs of the report go onto to say 'We must have a Local Plan. We understand this, and we are committed to developing one within the timeframe we have set out. We will do everything we can to protect our local environment and the Green Belt which is so important to our residents. "We have consistently lobbied Government to allow us to use the recent, more accurate household projection figures published by the Office of National Statistics in September this year. Using these figures would mean we need release almost no Green Belt land for development. "At the moment, the Government are refusing to allow us to lower our projections, so we must continue to plan for the bigger housing target - 12,000 over the next 15 years. The failure of the Council/Councillors to produce a Local Plan prior to now, is the very mechanism, which has resulted in our Greenbelt being put at imminent risk. As I am sure you are aware the Government has recently had a 'Technical consultation on updates to national planning policy and guidance' and it clearly stated in paragraph 21 of this document 'Any of these (local) plans that are submitted on or after the 25 January 2019 will be required to use the standard method to inform strategic housing policy'. So Wirral Councils failure is the direct reason that we are now unable to challenge the use of the standard calculation. In an effort to combat this and save the greenbelt, then the priority must be given to development on Brownfield sites and bringing empty properties back into use, prior to any planning applications being approved on greenbelt land or as it will become 're-designated' or 'ex' greenbelt land. If the Council/councillors truly wish to improve Wirral it will keep the green spaces we have and redevelop the areas so much in need i.e. Birkenhead and New Ferry. It will not be forging ahead with band C-H properties in with a small side order of 'affordable housing' to sprinkle around the Borough so Councillors can claim a moral victory when in fact the only winners are the House Building companies, at on average £50k profit per house. Recommendations of the report include: Scheme of Delegation be amended to delegate decisions relating to the approval and publication of the evidence base and associated technical reports to the Director of Economic and Housing Growth in consultation with the portfolio holder for Housing and Planning. I have to say the fact that there are already developers sizing up fields of greenbelt including greenbelt which is used as farmland, the council are writing to households telling them to remove 'supportive greenbelt signs', it feels like the decision is a foregone conclusion. The recommendation to delegate this responsibility as above, seems another effort by the leaders of the council to absolve themselves of responsibility and make holding elected councillors to account difficult for Wirral residents. Finally I would like to raise the issue that the Council has employed 'Leading Counsel' 'who has recently been appointed to advise on the remaining stages of plan preparation, to adoption'. On the basis the Council/Councillors represent Wirral residents/council tax payers, let us hope that the Counsel who has been appointed is there to work for and protect the interests of Wirral residents and their clear and unequivocal</p>

DOR REF	RESPONSE
	<p>view that they wish to protect the local environment and DO NOT wish to see Greenbelt released for development'. I raise this point as I have no confidence in the ability of the Council/Councillors to actually listen to and promote the concerns and wishes of Wirral residents. This has most recently been demonstrated in the recent planning appeal over Storeton Hall Development. While I know the council will state that they defended the appeal as they employed a director of GVA clearly questions have to be raised about the appropriateness of this engagement. As I am sure you are aware GVA is a business which boasts 'We promote and secure hundreds of complex, high profile planning approvals for a range of city centre, commercial, residential and strategic residential schemes for developer, landowner, investors and asset managers. Schemes such as building 2,800 new homes on Green Belt land in Redditch' https://www.gva.co.uk/expertise/services/town-planning/ also understand that GVA are acting on behalf of Taylor Wimpy have written a letter of objection against a Tree Preservation for trees on the copses of Levers Causeway! This is public money and taxes that are being used to undermine the wishes of Wirral residents and fail to protect Green spaces and iconic areas which make Wirral so special.</p>
DOR00664	<p>I view with alarm the proposed plan that will remove adjacent farm land from the Greenbelt. It is my firm belief that the fields that surround the village are key to retaining its distinctive character and its semi-rural character which serves as a green buffer between Moreton and Meols. Once the protection is removed then development will become inevitable. I understand that options to build have already been sold by absentee landlords. If these fields were to be developed on, then the farms and their buildings will become economically unviable. This will lead to the collapse of the "distinctive" semi-rural character of the village. This would be a total breach of the founding principles established by Wirral Metropolitan Borough Council when the conservation Area was first established. I am also concerned that the largest field earmarked for development lies in the floodplain of the Arrowe Brook. This run off area is a crucial element in the flood defences and any houses built in that area would be at serious risk of flooding. The housing on the opposite bank would also be at risk.</p> <p>I would also like you to bear the following facts in mind:</p> <ul style="list-style-type: none"> • The ONS has reduced the projected need for new housing from 800 units per annum to 449, it seems that Westminster will further reduce this figure. • National TV (Sky News National Housing Survey) has, quite rightly, identified the lack of high quality privately rented accommodation in areas such as Birkenhead as the primary housing issue and not the absence of new build Greenbelt Areas. Indeed, it has found that the current supply is more than adequate. You may wish to reference https://news.sky.com/feature/line-18-is-there-a-housing-crisis-in-you-area-11479965 • Development Director of Peel Holdings has confirmed that they can build 1500 new units by 2022 and 6540 by 2033. Peel Holdings has an ultimate goal of 13,000 new homes on the brownfield sites held by Peel in Wirral Waters. • This proposal to release Greenbelt land will not address the primary need to provide high quality privately rented accommodation in the areas that are most in need of them such as Seacombe, Egremont, New Brighton, Birkenhead, New Ferry. The sad fact is that the residents in these areas could not afford to buy houses built in Greenbelt areas. <p>I would ask the following questions:</p> <ul style="list-style-type: none"> • Wirral planning policy has been to disallow any housing development west of the M53? Why has this policy changed? • Why has it taken so long for Wirral to complete its Local Plan? Other Local Authorities have had them in place for 13 years. • Why is full use not being made of the existing Brownfield sites? • Indeed (Council Leader) is on record as stating that "no incursion into the Greenbelt might be required" <p>I sincerely hope that the proposal to remove the land from the Green Belt is not driven by the amount of Council Tax that will be raised. This is likely to be considerably more than that raised by brownfield development. Indeed if all the planned brownfield development takes place plus the Greenbelt development then there will be a huge increase in Council funding. Perhaps this is the real driver behind these plans.</p>
DOR00665	<p>Submission regarding Infill Village near Thornton Hough. The estate is a very small mature development surrounded on 3 sides by agricultural land and by the B5136 on the 4th side. Extending the estate would have a detrimental effect on the agricultural land and the various wildlife that live and depend on this environment. Also the infrastructure of the village would not be able to sustain the extra traffic and population by extending the size of the village, as well as there are no current amenities here as it is i.e. no shop to buy food or essentials etc for the current residents let alone increasing it! In short in my opinion Thornton Hough should not be released from green belt, or to be built on and can the council give an undertaking that green belt boundaries will not be redrawn? It is imperative that the character and history of Thornton Hough is retained!</p>
DOR00666	<p>I am writing to object to the councils proposed plan to develop green belt sites in Wirral for housing. I wish to make the following points. There are already many empty houses that could be used. Local population growth figures do not substantiate the housing targets identified. Land values on Green belt may lead to more expensive homes being built many green belt sites are isolated and therefore unsuitable for public use. We would lose many beauty spots, woodlands, natural habitats, etc.....There would be a huge strain on schools, doctors surgeries and hospitals.</p>

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DOR00667	To whom it may concern, firstly, Wirral's Council Local Plan should be just that. A plan drawn up by local people who know the area. This is so important and much more so in an area as unique as The Wirral. The shortage of brownfield sites is the result of a shortage of imagination. Birkenhead town centre which used to be a bustling commercial hub can no longer be considered as such, so many shops have gone, others such as Debenhams in the precinct are so desolate. This may be a commercial area but in my view it's also brownfield...bring back people to the town centre, convert the spaces above the larger shops into apartments. There are so many older building in this area that could be considered for this type of dwelling, ideal for young singles wanting affordable housing. There must be architects out there with vision, inspiration...call it what you will but for goodness sake use it! We must save our Wonderful Wirral from some planner who gives not a jot for our peninsula.
DOR00668	I am writing to lodge the strongest possible objection to your planned proposals to ruin the greenbelt land in Eastham. If all this house building is carried out we will need more schools, doctors surgeries, dentists. This apart from the extra traffic this will put onto already crowded roads. I understand there are 4600 empty properties on the Wirral and would suggest your money would be better employed putting these houses in good repair and leaving the greenbelt alone.
DOR00669	I wish to register my strong objections to the Councils proposals for reclassifying Green Belt land in and around the Eastham area for housing. I believe the references of the various parcels of land are: SPO 50 -SPO 55 inclusive. My objections are as follows: 1. I am against continued erosion of Green Belt land for whatever reason. The Wirral is an attractive environ precisely because of the green belt. 2. The village of Eastham is an historic and attractive village that will be ruined by development on the surrounding green belt. 3. The proposed developments will mean that Ellesmere Port and Eastham start to merge losing the individual identities of those places. Further housing development in the above areas will put further pressure on local services, amenities and roads which are already under pressure from the numbers of inhabitants. Please ensure that my objections to these proposals are duly noted and recorded.
DOR00670	The area in which the allocation of 17 units is proposed suffers from a number of social issues including drug abuse, street violence. It is likely that having new, high density social housing will exacerbate these problems. There are already unoccupied and dilapidated properties close by so it is critical that whatever is built enhances the area and doesn't merely add more unwanted dwellings. There is a lack of green spaces in the area and this is one of the few remaining ones. It will lead to more on-street parking in an area already suffering from a lack of on-street parking. It will have a negative impact on the view of the listed Kenyon Terrace. The Wirral peninsular is an area of outstanding beauty which attracts tourists and improves the quality of life of residents. The proposals to develop certain areas of green belt will affect tourism, harm the beauty of the area, will negatively impact the quality of life of residents and is short sighted of the council. Brown field sites and urban areas should be re-developed first. As the peninsular is bounded by rivers and the sea on 3 sides and is a relatively small area it should not be over-developed. Building on the green belt will negatively impact wildlife. It is unclear whether the area currently needs an increase in housing provision to this extent. Surely it would be sensible to lobby central government to have a more locally responsive set of housing targets rather than building on green belt land as per the dictate coming from Westminster.
DOR00671	I understand that the Playing Pitch Strategy of 2016 fulfils the requirement for assessment and the findings for SHLAA 3037 clearly identify that the land is not surplus to requirement, that the good quality pitch provision is already at capacity and that the Cricket Club demonstrates it serves the needs of the local community by its second highest team membership in Wirral. I am pleased to see that the recommendations of the Playing Pitch Strategy (PPS) and its Action Plan & Strategy have been approved by the Cabinet Member for Housing and Community Safety and adopted by Wirral Council as a material consideration in planning matters. Aim 1 of the PPS is to "protect the existing supply of outdoor sports facilities where it is needed for meeting current and future needs". For cricket, the recommendations of <ul style="list-style-type: none"> Existing quantity of cricket pitches to be protected Ensure tenure remains secure for all clubs are appropriate when considering SHLAA 3037 . Inclusion of Upton Cricket Club within the sites for Strategic Housing Land Availability Assessment is contrary to the Aims and Recommendations of the PSS because <ul style="list-style-type: none"> Its inclusion makes it available for consideration for housing and thereby removes the existing quantity of cricket pitches from protection. Its inclusion provides uncertainty over the tenure thereby removing security for the club. Based on the above I request that as part of this consultation the site at Upton Cricket Club (SHLAA 3037) is removed from Wirral Council's Strategic Housing Land Availability Assessment because its inclusion is contrary to Wirral's adopted Playing Pitch Strategy and also paragraphs 96 and 97 of the National Planning Policy Framework. Based on the revised SHLAA Methodology it should be identified as Category 4.

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DOR00672	We would like to register our objection to the possibility of building on the Green Belt particularly in the area around Mount Road, Lever Causeway and Storeton Village. We feel that such developments would irreparably damage the area and fundamentally change the character of the area. We do not see the need for construction in the Green Belt especially as there is ample Brown Belt land available for development in Wirral. In addition to the loss of amenity in the Lever Causeway area, prime agricultural land would be lost, and if developed there would be massively increased traffic and road congestion in the area. The Government's new housing target for Wirral is far too high at 12,000 new dwellings and the Council should do more to challenge this and have it agreed at a more realistic and much lower level. Any development of the Green Belt land would gravely damage the amenity of the Lever Causeway area which is used extensively by local people for leisure and relaxation. We ask that the outcome of the current consultations should be that there will be no development in this Green Belt area, and trust that our views and objections will be taken into account.
DOR00673	As the council leader said The Green Belt of Wirral is the Jewel in Wirral's crown. It would no longer be so if these proposals are passed. In fact I feel strongly that people would be put off coming to live here, I certainly would. What is the figure of the required number of houses based on? Why cannot land that has already been granted planning permission be counted toward said number? Surely there is enough brownfield land to accommodate the number required. What about the proposed Wirral Waters scheme by Peel Holdings around the Birkenhead Docks area? The Green Belt areas being proposed for development would surely not be affordable housing, or is that not the intention! We also have a lot of empty housing around Wirral so why do we need to build so many more houses? I think if these proposed plans go ahead it will be a disgrace and would certainly change not only the character and the history of the area and Wirral in general but would adversely affect the high level of biodiversity. The quality of life of some existing residents would also be affected, not least a huge increase of traffic potentially a safety issue.(some of these areas are very popular with young families.) The local schools are already oversubscribed, doctors and dentist surgeries are already very busy potentially leading to longer waiting times for appointments. Please reject the proposed release of green belt land.
DOR00674	[SAME AS DOR00643]
DOR00675	I am writing to add my objection to the proposals for redeveloping around Lever Causeway. There are many, many other brownfield sites that need to be redeveloped; we need to be protecting and creating more greenbelt, not destroying it. Brexit and Climate Change are massive issues that affect us all, and we will need decent arable land, plus natural areas if we are to stand a chance.
DOR00676	Please take this email as my strong objection to the proposed development of green belt sites across Eastham, in particular the Rivacre Road developments. Whilst I understand the need for new housing I think all avenues and other sites (i.e. brown field and the like) should be considered before destroying what little open space we have left in the area, once it's gone there is no replacing it.
DOR00677	[SAME AS DOR00455]
DOR00678	[SAME AS DOR00455]
DOR00679	[Enquiry not a response]
DOR00680	<p>SHLAA 0708, Land at The Akbar, Heswall, 6 units</p> <ul style="list-style-type: none"> • The public sewerage network has sufficient capacity to accommodate the potential foul flows from this site. • Potential developers need to be aware that the north-east corner of the site is crossed by a 150mm public sewer and protection measures in the form of an easement width or a diversion of the sewer would be required. • Heswall Wastewater Treatment Works has sufficient capacity to accommodate the potential foul flows from this site. • Welsh Water does not supply water to this area. <p>SP058C, North of Ferns Close, Piper's Lane, Heswall, up to 28 units</p> <ul style="list-style-type: none"> • The public sewerage network has sufficient capacity to accommodate the potential foul flows from the theoretical capacity of this site. • Offsite sewers would need to be laid to make a connection to the public sewerage network. • Heswall Wastewater Treatment Works has sufficient capacity to accommodate the potential foul flows from the theoretical capacity of this site. • Welsh Water does not supply water to this area. <p>SP058D, East of 117 to 121 Piper's Lane, Heswall, up to 35 units</p> <ul style="list-style-type: none"> • The public sewerage network has sufficient capacity to accommodate the potential foul flows from the theoretical capacity of this site. • Offsite sewers would need to be laid to make a connection to the public sewerage network. • Heswall Wastewater Treatment Works has sufficient capacity to accommodate the potential foul flows from the theoretical capacity of this site. • Welsh Water does not supply water to this area. <p>SP058E, West and North of 85 to 105 Piper's Lane, Heswall, up to 30 units</p> <ul style="list-style-type: none"> • The public sewerage network has sufficient capacity to accommodate the potential foul flows from the theoretical capacity of this site. • Potential developers need to be aware that the site is crossed by a 150mm public sewer and protection measures in the form of an easement width or a diversion of the sewer would be required.

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	<ul style="list-style-type: none"> Heswall Wastewater Treatment Works has sufficient capacity to accommodate the potential foul flows from the theoretical capacity of this site. Welsh Water does not supply water to this area. <p>SP071, Land at Chester Road, Heswall, up to 281 units</p> <ul style="list-style-type: none"> The public sewerage network has sufficient capacity to accommodate the potential foul flows from the theoretical capacity of this site. Heswall Wastewater Treatment Works has sufficient capacity to accommodate the potential foul flows from the theoretical capacity of this site. Welsh Water does not supply water to this area. <p>SP109, Land at Boathouse Lane, Heswall, up to 2 units</p> <ul style="list-style-type: none"> The public sewerage network has sufficient capacity to accommodate the potential foul flows from the theoretical capacity of this site. Offsite sewers would need to be laid to make a connection to the public sewerage network Heswall Wastewater Treatment Works has sufficient capacity to accommodate the potential foul flows from the theoretical capacity of this site. Welsh Water does not supply water to this area.
DOR00681	I have just been informed to the proposal of your destruction of Eastham. It is with great vehemence I am writing this email to you requesting, no demanding a rethink on your parts to stop this blatant rape of the countryside of Eastham. You have already rescinded on your promise to open a road from the A41 where you have given permission for new houses to be built on the land of the rugby club, so how are we to believe any further promises to keep the next phase to the current proposals. Therefore I as an Eastham resident of over 47 years I am asking for these plans to be scrapped.
DOR00682	I am writing to lodge my strong objection to any building work on Lever Causeway, Wirral. It is a pleasant area to walk down and it would be such a shame to destroy it and also damage the environment and wildlife.
DOR00683	<p>The number of houses</p> <p>Households Population Occupancy</p> <p>UK Housing Stock in 1996 23,738,500 / 58,164,374 = 2.45 people</p> <p>2006 25,378,900 / 60,827,067 = 2.40</p> <p>2016 27,088,700 / 65,648,054 = 2.42</p> <p>Applying what seems to be the national occupancy rate of 2.4 to Wirral</p> <p>10,898/2.4 =4,541 new dwellings by 2036</p> <p>4,541/15 =303 per year (over 15 years)</p> <p>Brownfield sites empty housing - The use of the greenbelt is unwarranted when there are available brownfield sites available specially in New Ferry an area devastated by an explosion in March 2017. Also in the Birkenhead and Wallasey waterfronts where Peel Holdings has effectively land banked despite having planning permission for 13,000 properties. These sites would be ideal for affordable housing and for retirement housing as this would be good for Wirral's ageing population thus releasing family homes for others.</p> <p>Chosen Greenbelt sites - The sites chosen are mainly on the north side of the M53 corridor when there are other greenbelt sites to the south of the M56 corridor which fit the terms of the Planning departments "Methodology" for making greenbelt land available.</p> <p>Affordable housing - Greenbelt land will not be used for social or affordable housing rather luxury developments, this will result also in large growth in areas already struggling with the infrastructure.</p> <p>Urban Sprawl - The possibility of Bebington, Bromborough and Eastham merging together.</p> <p>Merging Areas - The loss of historic hamlets such as Storeton, Little Storeton and Barnston losing their identity</p> <p>Wellbeing - The overall loss of the countryside which is good for exercise, wellbeing and good health.</p>
DOR00684	<ol style="list-style-type: none"> The proposed new houses to be built on productive farmland around Lever Causeway and the surrounding area are not needed as at the moment there are 5000 empty homes on Wirral which could and should be brought back into use. There is also sufficient land in urban areas to build on to meet the modest requirement for new homes over the coming decades. Added to which there is a plan for Peel Holdings to build up to 13000 new homes at the Wirral Waters scheme. This is mainly on brown field sites.....I have seen part of the letter sent to the leader of Wirral Council in which the top man from Peel Holdings says " Given the way you have conducted yourself in recent months, and the very misleading public statements you have made, we ask that you stop this campaign of misinformation; be honest with the people of Wirral and correct the misleading information you are distributing." This is an appalling thing to happen. One wonders what the council is up to??? Do they want Peel Holdings to withdraw so that some of the most beautiful and productive country side in Wirral can become just another urban sprawl! If these houses were built around Lever Causeway they probably would be large four bed-roomed properties with double garages.... As these makes the builder more profit! <p>Please note the Glenavon site. I believe that planning permission was given for affordable housing. I now understand that the builders have re-applied/been given permission to build 4 bed</p>

DOR REF	RESPONSE
	<p>roomed houses with double garages!</p> <p>3. There would be increased traffic and major congestion around the area.</p> <p>4. If they were built, where would the extra shops, schools etc be? Local Schools are already bursting at the seams!</p> <p>5. Where would all these people come from?</p> <p>6. Storeton is a small historic settlement which will be directly affected by any building on Lever Causeway. If this went ahead there could be unrestricted sprawl merging to it to Bebington!</p> <p>7. As we are the Wirral Peninsula, surrounded on three sides by water, our green belt is even more precious as there is nowhere else to go!</p>
DOR00685	<p>This appalling proposal goes against all reason and ignores the purposes of retaining green belt land. I really feel Wirral planners will regret taking any decisions to reclassify which will so seriously affect the environs of such an historically important area and which are not wanted by those living in the area. Is the purpose to turn Wirral into a copy of Liverpool - miles and miles of housing with an occasional park dotted about, because that will be the outcome.</p> <p>All I can do is seriously request that these proposals are rejected. Eastham fits all five purposes of Green Belt laid down by Central Government.</p>
DOR00686	[SAME AS DOR00455]
DOR00687	<p>We are reliably informed that the Wirral is not an area of high housing pressure as 43% of its area is built on compared with 10% in Cheshire West and 6% in the UK as a whole, and that 45% of the Wirral is designated as Green Belt. Nevertheless the July 2018 Wirral Cabinet Report suggests that 12,000 new dwellings are required over the next 15 years using the Government Standard Method and 2014 ONS 2014 based projections. We agree with the Heswall Society's view that the Council's estimate of the shortfall in housing need is wrong. We are also concerned that the Council's Review has identified a number of locations between the Wirral Way and the Estuary where potential infill opportunities exist. We deplore any suggestion that the openness of the land in this area and its importance for local recreational amenity. We also deplore the use of 6 Green Belt sites which the Council identify as potential sites within the Heswall Ward. Finally we wish to express our strong criticism of recent Planning Decisions in the Heswall area. The Department seems fixated on allowing the construction of Apartment Blocks in places where there are existing homes, much to the benefit of speculative developers and by choosing to ignore current Wirral Council planning guidelines in order to satisfy housing targets and party-political aims. In our opinion too little consideration is being given to affordable housing needs and too great a focus on developing opportunistic sites which ignore long term residents' views.</p>
DOR00688	<p>I would like to lodge my objection to the council reclassifying the green belt in Eastham. All of the areas under consideration: SPO 48, 50, 51, 52, 53, 54 and 55 are part of our heritage and our children's future and should NOT be reclassified. This land belongs to the public and their well-being and health and I feel that the council will have total disregard to our health and well-being if you allow reclassification. This will ultimately cost the council more for health care in the future and is very short sighted.</p>
DOR00689	<p>Barnston dale. The dale is a very special place with many now uncommon bird species as well as butterflies, mammals and reptiles amongst many. I know the dale is protected but I do worry that your plans will cut off the wildlife corridor into it and so seriously affect the wildlife within the dale is a site of biological importance so the area around it needs protecting too. Also on the fields adjacent to Barnston road there are frequently flocks of greylag & pink-footed geese, curlews, snipe, oystercatcher and redshank. These flocks are frequent during the winter months especially during storms. The birds have come from the Dee estuary which is a Special Area of Conservation as defined by the Joint Nature Conservation Committee advising DEFRA. As I know the farmers in the area are in the high level stewardship scheme with Natural England and leave stubble and grain in the fields I am worried these birds will have nowhere to go during storms on the coast. We have a number of Nationally protected species such as barn owls, bats and badgers on the fields identified, as well as ponds which in all probability have great crested newts. The road infrastructure is creaking at the moment with frequent rush hour queues caused by the broken junction at Barnston road and Storeton lane intersection. Any bypass would have a detrimental effect on wildlife. Also we have lost the 77 bus so have no public transport along Storeton lane as opposed to the very poor service we had before. This is a very special place for wildlife please respect it so future generations can appreciate it too. I think your plans lack environmental sensitivity so urge you to think again.</p>
DOR00690	<p>a) Why do we need so many extra houses given that the target figures stem from the Local Council's own inflated population and economic growth projections?</p> <p>b) Why are both national and local government proposing Green Belt land grab when their own agreed policies are currently to protect Green Belt?</p> <p>c) why cannot the Council count land which has already been granted planning permission?</p> <p>d) What is the point of earmarking so much Green Belt land for housing when there are so many Brownfield sites available in and around Birkenhead where AFFORDABLE housing could be built as opposed to building highly expensive properties on Green Belt land in other parts of the Wirral. We need more affordable housing as opposed to executive housing.</p> <p>e) Why is the Council not pursuing a 'Brownfield First' policy which would then ensure all the Brownfield sites being exhausted and the 6000 empty properties on the Wirral being brought back into use before any Green Belt land was released?</p> <p>f) Why is the council not working more closely with Peel Holdings to assist Peel Holdings to build some of the 13500 homes at Wirral Waters?</p> <p>g) Why is not more being done to regenerate Birkenhead Town centre with a mix of retail and housing? The present shopping area is now too big for the size of town and given the proximity of Liverpool and various out of town shopping centres. Surely it would make more sense to reduce the number of retail outlets and build affordable housing instead. This would lead to a more pleasant shopping environment with less empty outlets and because of the new housing there would be more potential customers for the outlets which remain.</p>

DOR REF	RESPONSE
	<p>The Wirral is a special area with its coastline and pleasant Green Belt areas which attract visitors from far and wide. The obliteration of the ancient character of villages such as Storeton, Barnston and Eastham and the destruction of woodland in west Wirral to build more housing would change the nature of the peninsula for ever and it is something I would urge you to resist with all the power at your disposal.</p>
DOR00691	<p>Lever Causeway is a well-used beautiful open area that many people use for walking horse riding and exercise, The views from this elevated area are unrivalled and would be lost forever. There would also be a devastating impact on the local wildlife at the present time we have foxes badgers rabbits and hares there are also the endangered hedgehogs that patrol the area. Then there's the extra traffic to consider the roads heading towards the M53, Heswall, and Birkenhead are all small roads and country lanes this would have a negative impact on all the surrounding area and then there's the extra pollution to consider driving to shops act. The general feeling is that there is plenty of brown land that needs to be developed and improve the image of Wirral instead of ruining the countryside and leaving vast spaces of land that need improving in the riverside docklands area.</p>
DOR00692	<p>Affordable homes in my area that I have grown up in and work in is exactly what I am looking for. It will allow me to get onto the property ladder while providing a happy home of our own for my children</p>
DOR00693	<p>I wish to object to any proposal to use Greenbelt land in Wirral for housebuilding. I would like to make the following general comments; -Brownfield sites should be utilised first. - Peel Holdings should be encouraged to develop as previously agreed. - Existing empty houses in Wirral should be invested in and brought back into use. -Existing Greenbelt rationale should be followed- e.g. preventing sprawl, merging and to safeguard against encroachment. -ONS updated figures re the number of houses actually required should result in amendments to the plan. I would like to add the following points specifically re any proposed development in Caldý adjacent to Stapledon Woods or to Caldý conservation area; -Any development here would result in encroachment. -Local infrastructure would not cope with the additional residents and vehicles. -Any development would not provide affordable housing due to the price of the land. -Wildlife on the existing agricultural land would be destroyed and this would also impact Stapledon Woods and Caldý Hill -Canada Geese and ducks currently flock to this land. -This land is opposite a site where thousands of bar tailed godwits migrate- visited by many bird-watchers -This is agricultural land currently used as a hunting area for barn owls (a protected species) —This land also houses or feeds other birds and animals including badgers, hedgehogs and woodpeckers. Even if the existing housing forecasts had to be implemented, Wirral can achieve this without allowing building on existing agricultural and other green spaces.</p>
DOR00694	<p>I am horrified that you are so ready to destroy a large area of agricultural and ecologically significant land in order to produce yet another golf course when it is clear that the ones we already have are struggling. The 166 luxury homes that are planned would also be in flagrant defiance of greenbelt law, the Government relaxation of which under certain circumstances is specifically for small scale developments of starter homes where there is no alternative. This does not exactly meet those criteria, does it? I am very concerned about the effects that it will have on local people. Hoylake is a quiet residential area and people live there because they like it that way. In fact, most of us who live on the Wirral like it because it is a bit of a backwater. You seem to think that it is a good thing to turn the area into a 'world class destination'. I think that there are very few people who would agree with you. The complex is going to put unacceptable strains on the local infrastructure. The number of additional cars and support vehicles that the hotel complex will generate has been estimated at 1,500. During construction there will be large numbers of lorries and heavy machinery. Hoylake does not have the roads to take such traffic. According to the plans available it looks as though there will be two points of access. One is Carr Lane in Hoylake across the level crossing where there are delays when trains are due. The other is in Saughall Massie Lane, a small country lane which is already dangerous because of the volume and speed of the traffic which use it even now. In a year when there has been greatly reduced summer rainfall and consequent anxiety over the yields of crops, we are all the more aware of how precious our farmland is. The planned golf course will remove a large area from production with inevitable consequences for other businesses.</p>
DOR00695	<p>This area is our 'gateway' to the local countryside within walking distance from Tranmere, Prenton, Bebington, rock ferry. We live in a built up area and I feel we need some easy accessible green areas to walk. We are being told to 'get active' enjoy the great outdoors! This building development doesn't encourage it. Please reconsider.</p>
DOR00696	<p>1.1 The outline proposals of the Wirral Borough Council whilst complying with the methodology required by the Secretary of State for Housing fail to give due weight to the special circumstances of Wirral which must cause the proposals, as presented, to fail. 1.2 Wirral has an ageing and declining population and the growth figures used in population projections are not supported by: Evidence of increasing birth rates Migration to Wirral Evidence of increased employment opportunities</p>

DOR REF	RESPONSE
	<p>Evidence of economic growth for the Borough1.3 The proposals fail to meet any of the five core principles of the Green belt criteria as provided for in the National Planning Policy Framework.</p> <p>1.4. The proposals fail to recognise the inherent limitations in transport communications of a peninsula.</p> <p>1.5. The use of “settlement areas” as opposed to natural boundaries does not recognise the history, customs and use of small towns and villages which typify the Wirral landscape.</p> <p>1.6. The development of green belt sites would diminish their desirability as places of residence to the socio/economic groups who substantially contribute revenues to public and commercial services.</p>
	<p>1.7 The information about brown field sites is scanty when compared with the emphasis placed on the development of green belt sites.</p> <p>1.8 The low costs of green belt development compared with that of brown field sites which may which require more costly remedial works to prepare them for re-development makes the use of green belt an easy option for the Council, disregarding its duty to maintain the green belt.</p> <p>1.9 The apparent support for discussions between land owners, would be developers and the Council appears to undermine the objectivity of the Council.</p> <p>1.10. The magnitude of infrastructure and the related costs to meet the illustrated theoretical population growth is probably unaffordable.</p> <p>1.11 The letter dated 10 September to the leader of the Council from the Director of Wirral Waters exposes the unreliable and questionable WBC basis of housing need and expected provision over the planning cycle in the following terms: “The figures (for housing provision) we have provided have been grossly misrepresented in your letter to local residents.”.</p> <p>The Barnston Village and Woodlands Drive options for an infill village (SPO65) fail to recognise that:</p> <p>2.1. Barnston Village has special characteristics including conservation area status; that the Woodlands Drive, through recent planning approvals has little land for development.</p> <p>2.2 The approach to Holmwood Avenue is via Holmwood Drive, itself unsuitable for traffic which abuts a site of special historic interest and is bordered by ancient hedging and important wildlife habitat.</p> <p>3. Conclusion.</p> <p>The consultation documentation, whilst, voluminous and obscure, does not build a credible case for the encroachment of housing on to designated Green Belt sites.</p> <p>I urge the Council to reject the proposals as published and to produce a consultation document that addresses the above issues and which, in particular:</p> <p>3.1 Re-appraises the realistic population projections for the Borough.</p> <p>3.2 Gives further and better particulars of brown field sites and vacant land with potential for housing development not designated as Green belt.</p> <p>3.3. Ascertains the factual position with regard to the housing contribution to be made by Peel Holdings through the Wirral Waters scheme.</p> <p>3.4 Makes available for public consultation a revision that re-works and corrects the inaccuracies of that currently published.</p>
DOR00697	<p>1. The calculation of the theoretical need for 12,000 houses is flawed. It is based on national statistics rather than local statistics.</p> <p>2. We do not need 12,000 houses. Using the Council’s ‘Wirral Population Projection’ the increase in population between 2018 – 2038 will be 5,500.</p> <p>2. The local population is currently declining as more of our young people leave due to the lack of employment opportunities.</p> <p>3. We already have Wirral Waters identified as a brown field site with sufficient area for 13,000. If they are not prepared to build this number a solution would be to use a Compulsory Purchase Order on some of the land allowing either the sale of the land to another builder, or the building of Council/Social housing funded by central government or yourselves.</p> <p>4. Little reference was made to any further brown field sites within Birkenhead. I would suggest that, there are a number of derelict sites, which could be redeveloped, and in so doing it could regenerate the whole area.</p> <p>5. Of Wirral’s 157 square kilometres, 46% is already covered in houses. (compared with an average of 12% of land in the rest of England). Figures given at the Open Meeting show that to build the required number of houses 67% of our precious land would be covered. As we are so reliant on the local tourism industry, do we want to jeopardize this by turning our beautiful area into an urban sprawl that few would want to visit?</p> <p>The Proposed Development of land in Pipers Lane</p> <p>1. There is lack of access to the fields and land at the eastern end of Pipers Lane. In places the lane is less than the legally required 5metre width.</p> <p>2. Currently the surface of the lane is suffering from the almost continuous development that has taken place over the last few years. Pot holes, a collapsing drain and a leaking gas main, have all been caused by the frequent heavy wagons and cranes required for developments and new builds.</p> <p>3. The residents have suffered from continuous noise and nuisance from the said recent developments.</p> <p>4. Any development would significantly increase the level of traffic in the Lane. The houses that would be built would probably be 2 (or even3) car families and the lane is currently unsuitable for the extra traffic and unsuitable for alteration.</p>
DOR00698	[SAME AS DOR00455]
DOR00699	[SAME AS DOR00455]

DOR REF	RESPONSE
DOR00700	[SAME AS DOR00455]
DOR00701	<p>Submission relates to Higher Bebington/Storeton and more specifically the area around Lever Causeway and Storeton Woods.</p> <p>There is sufficient urban land to build on.</p> <p>12000 houses are not required given the population projection.</p> <p>This would fundamentally change the character of the area.</p> <p>The sites either side of Lever Causeway are huge. Once released from green belt, building could extend to Storeton, causing unrestricted sprawl, with historic Storeton and Bebington merging.</p> <p>Lever Causeway and it's open spaces provide an area for exercise and relaxation for innumerable residents.</p> <p>Mount Road's elevated position provides unrivalled views which would be totally destroyed. Any building would cause substantial detrimental visual impacts on remaining green belt. Storeton is a historic hamlet which will directly affected by any building on Lever Causeway. This will cause irreparable damage to its setting.</p> <p>Increased traffic and major congestion. Mount Road at the top of Lever Causeway is already too heavily congested at peak times and this would worsen and spread to surrounding roads such as Thornton Road.</p> <p>Acres of prime agricultural land will be lost. The proposed destruction of green belt will have a damaging effect on Mountwood Conservation Area as it will destroy its setting.</p> <p>There is an abundance of brownfield sites and at least 5000 empty properties on Wirral which must be utilised first. As you can see I have a large number of reasons to object to this proposal and feel very strongly about this. I will do everything in my power to protect the area I live in for myself and for young son</p>
DOR00702	<p>I'm writing to express my deepest concerns about the proposed Local Plan to build houses on Green Belt land in Wirral.</p> <p>As I'm writing, I am sitting in Storeton Woods overlooking over the glorious landscape. I've been lucky to live in Wirral for over sixty years and love and respect our open green spaces and the how they contribute to the very special character of our wonderful peninsula.</p> <p>I've read a lot of the information about the Local Plan. I can't pretend to understand it all but a few important points stand out to me:</p> <ul style="list-style-type: none"> • the figures need to be questioned for how many houses we really need to build in Wirral to meet our own particular demands, not those set by central government • the fact that Wirral is unique in its situation, it is like an island with water on three sides, we can't expand outwards to meet unrealistic numbers of houses and neighbouring county councils aren't prepared to support home building from Wirral in their areas • a Local Plan delivered with integrity and honesty should be protecting the character of historic towns and villages, helping prevent urban sprawl and safeguarding the countryside, not threatening it. • there are available sites that can be used in Wirral, for example land that has already been granted planning permission, and brownfield land that is earmarked for both housing and industrial development in Peel Holding's Wirral Waters scheme. <p>I firmly believe that Wirral Council needs to be looking at this with courageous, far-reaching, wide-ranging ideas, looking beyond the obvious quick fix of using 'easy, ready to build' land which will meet dubious targets. Once our historic fields, paths, hedgerows, wildlife etc are gone, they will be gone for ever. I'd like to see creative thought and innovative solutions to do more with what we already have, rather than thinking of easy, short term options, using honest power and persuasion to come up with brave plans that really do safeguard the unique mix that is Wirral and benefits all its residents and visitors.</p> <p>Our green fields and everything that lives and survives and benefits from them can't shout out for themselves, they can't put up barriers and protect themselves. All we can do is speak for them and say, 'please use what we already have to meet realistic housing targets, and don't take the easy option and destroy what can never be put back again'.</p> <p>Surely that's the way to deliver a truly sustainable Local Plan for everyone in Wirral, both now and for future generations.</p>
DOR00703	<p>Thank you for your consultation. The Canal & River Trust have reviewed the consultation documents. Our only land interest is Morpeth dock and Egerton dock. It is noted that there is a proposed employment uses which abuts Morpeth Dock (ELPS031). Given the industrial nature of the area such an allocation for employment would appear to be appropriate.</p>
DOR00704	[SAME AS DOR00455]
DOR00705	<p>I wish to express, in the strongest possible terms, my opposition to the proposed building development on green belt land on Wirral.</p> <p>While I appreciate the need for more housing, I consider that our peninsula has already lost much of its precious countryside to building, and that further encroachment on the green belt would cause the merging of townships and irretrievable loss of invaluable green spaces including much farmland in an area where we are bounded on three sides by water.</p> <p>I have been unable to find any evidence of justification for the figures for the projected housing need as applied to Wirral (surely it is wrong to apply one rule to the entire country without considering local variations) but even if they are correct, surely any available brownfield sites should be used first? Is there no way to encourage Peel Holdings to honour their promise given in 2010 to build more than 13,000 homes in the Wirral Waters area?</p> <p>The threat to the land surrounding Storeton woods is particularly worrying considering the manner in which Bebington would merge with the ancient village of Storeton.</p> <p>Please listen to the concerns of residents before taking steps which would damage our environment for ever.</p>

DOR REF	RESPONSE
DOR00706	<p>In addition my objections stated I would like to add the following</p> <ol style="list-style-type: none"> 1. I find it difficult to accept that building on farm land and green belt is acceptable whilst there are numerous brown sites across Wirral. i.e. Dock Road North New Ferry there is around 6.5 - 7 acres of cleared brown field site. Riverbank Road Bromborough around 2 - 3 acres of open Brown Field. The Dock areas of Birkenhead and Wallasey have been empty for years and despite Peel Holdings plans to develop they have failed to do so and will not do until the economic conditions are favourable for them to make a profit. This is against the back drop of housing shortage. Lovell's in New Ferry have sat on cleared land for years again failing to develop. These are just the ones I see whilst walking around. The LA needs to step up to the mark and stop going for easy options and challenge land holders who do not develop the land they sit on waiting for the best profit margin. 2. The area named above borders An SSSI and LNR grey and dirty water runoff will further pollute this area. Building on green belt will add additional pressures on our wildlife. I know this last statement will possibly be seen as a green warrior and a bit strange but we have definitely come to the brink with regards to the health of our environment and therefore all developments that impact negatively upon this damages the health and wellbeing of future generations. 3. As stated in my original objection building on farming land whilst we cannot presently feed the country and as the population rises is short sighted to say the least. Especially as food security is at risk due to Brexit and global warming. 4. Infra-structure in and around the area is not adequate to cope with the possibility of thousands of new vehicles passing through at rush hour. After all Wirral's economy is so poor that it, as stands, we are just a commuter belt.
DOR00707	<p>I am writing to express my utter dismay at proposals put forward by the Wirral Council to build houses on diverse locations around the Wirral. A recent letter sent to households tried to explain the justification for these plans. The letter was an insult to all who read it - trying to say that the need to build on Brown sites AND green belt was the fault of Peel Holdings downgrading the plans for 12000 new homes to 2400 on the Wirral Waters Scheme. We all know and have known for years Peel Holdings put Birkenhead on the back burner before they sold the scheme off to some Chinese Company probably at a great profit- Why was and now more pressure being put on these companies to stick to their original estimates. Have they explained what they intend doing with the acreage difference in the reduction of houses, probably a Hotel, a high rentable office block, maybe a marina, following the lead given by the Council to build a golf course and hotel in Hoylake which nobody wants. These plans need scrapping asap already I see green land being laid out for development across the Wirral, soon there will be no countryside left just a great big metropolis bringing with it all the crime, drugs etc. We don't need it. The Wirral is already full we don't need more people living here. I have lived here all my life and used to think this was a special place; over the last few years it has gone from bad to worse. Look at Birkenhead it's now a ghost town, -and why? Council tariffs, inept town planning. Don't tell me Central Government are to blame the fault is entirely the Councils and their blinkered view on how to make Wirral a better place to live.</p>
DOR00708	<p>I am writing to advise you of my objection to the proposed development of greenbelt land in the Wirral.</p> <p>The objections submitted by others have been well defined by many of your Borough. It does not produce land in the right price range, only in the highest price range.</p> <p>Little thought has been given to the fact that once land has been released it cannot be taken back.</p> <p>It has been forgotten that the first effect of release of this land is to grant the owner a substantial financial windfall for no reason, land which has been purchased for agricultural use only then produced financial gain for the owner. WBC has no benefit from this and no evidence has been produced that Wirral residents will gain from this. It has been shown that the consequence is to provide houses at a price in excess of the price range which is required. There is no proven need for more houses in this price range. The provision of more housing in this price range does not meet the Governments. requirements.</p> <p>I hope you will reflect that it cannot be right to enhance the supply of this type of land. Removal of greenbelt land should be opposed at all costs. this proposal is not one which should be supported by the Labour Party.</p>
DOR00709	<p>I'm writing to express my concerns over the release of green belt land for development. I feel that had WBC been more efficient by completing a local plan earlier, challenging government targets earlier and working with Peel Holders earlier then the green belt could be saved. You said building on green belt land is the last resort but I and many others don't believe you. You have lost the trust of Wirral residents by already building the fire station on green belt land along with the ludicrous golf scheme and executive housing plan when north Wirral is in urgent need of regeneration. How will a golf resort improve the quality of life for people in socially deprived areas? You're a labour counsellor.. Help the people that vote for you. If you continue with this plan valuable farm land, wildlife habitats and swathes of our beautiful Wirral will be lost forever.</p> <p>The leisure peninsula will become an urban sprawl.</p>
DOR00710	<p>Assuming that Wirral Council's Local Plan meets its housing and employment needs, and includes appropriate mechanisms to protect the integrity of the internationally important nature sites on the Sefton Coast from harm including cumulative recreation pressure, Sefton Council has not comments on the Wirral Local Plan at the current time.</p>

DOR REF	RESPONSE
DOR00711	Our view is as follows: It is clear that houses need to be built but we would question the local plan with respect to the areas to be made available. The Wirral is most densely populated towards its borders with coastline and rivers and as such, these areas are generally the most polluted (air, noise, light) and have the least open green space being enjoyed by the most people. The central Wirral pool of Barnston, Brimstage, Clatterbridge, Thornton Hough and Raby, is the least densely populated and as such is generally the least polluted (air, noise, light) with the most open green space being enjoyed by fewer people. Making green space available to build on in the central Wirral pool of Barnston, Brimstage, Clatterbridge, Thornton Hough and Raby, would ensure a fairer share of the green space on the Wirral remains within reasonable distance of the majority of its residents. Green space is there for us all to enjoy and where it has been classified as greenbelt, it is to retain its openness and character for the enjoyment of Wirral residents. The local plan with respect to greenbelt will impact far fewer residents if it is confined to this central Wirral pool of areas. This should also give rise to far fewer objections from the voting public. Has it been considered that this may be an opportunity to create a new town in the central Wirral pool of areas that has its own infrastructure and services rather than stretching already stretched existing infrastructure and services on the Wirral?
DOR00712	I would like to raise my objections to the potential building on Lever Causeway Green Belt land. I was born and raised in Higher Bebington and currently live in [local area]. I have health problems so the ease of access to this area is vital to my wellbeing, the firm walkway provided by the newly installed path/cycle way make access possible to many who would otherwise struggle to get out into the open space afforded by Lever Causeway. The existing land in urban areas should be used to build upon before greenbelt land is considered, there are many empty and/or derelict properties and brownfield sites that could be repurposed to provide affordable housing. The character of the area will be spoilt if this area is built upon. The inevitable increase in traffic will cause major congestion in an area where this is already a problem at certain times of day, the local infrastructure wouldn't cope with the traffic and demands created by 12,000 new homes. Acres of prime agricultural land will be lost. There is potential for damage to Mountwood Conservation area. Once released from Green Belt, building could extend to Storeton, causing unrestricted sprawl, with historic Storeton and Bebington merging, local community bonds would be difficult to maintain.
DOR00713	Wirral Borough Council proposed Local Plan produced in response to pressure from the present Government; for additional housing development in Wirral, affecting existing Green Belt areas, seems redundant before any action is taken. The development proposed for a potential Infill Village near Oxford Drive in the village of Thornton Hough, would not be practical, with the absence of amenities and transport and no demand for housing in the area. The village of Thornton Hough; which includes a Conservation area, should be preserved for the benefit of all Wirral residents.
DOR00714	In respect of the Wirral Council plan to review use of land across the peninsula, including Greenbelt boundaries, I, as a resident of Thornton Hough, would like to stress that any such alterations to current Greenbelt and agricultural use boundaries in the vicinity of Thornton Hough would be a tragic error of judgement. As the leader of Wirral Council has said in 'Wirralview' the borough should be protected from untapped urban sprawl and unwarranted approaches from developers. I also note that there is an on-going problem re. the Hilltop Farm proposal as Leverhulme Estates, now a purely money-making enterprise, are attempting to allow building (at a profit) on good farmland and a part of the Greenbelt. So landowners also make unwarranted moves with no heed to boundaries or local residents. There should be plenty of housing sites already available e.g. Wirral Waters (Peel Group!!) and other Brownfield sites where there are up to another 6,000 units existing. How many houses etc. to a Unit? I did not move from town to country 30 plus years ago to become town again. The local infrastructure can barely cope already here and the road through the village is very much overused.
DOR00715	[SAME AS DOR00455] with additional point:- 11.) There is a massive greenfield site at the end of the slip road from the M53 near the docks, easily access from Wallasey Bridge road plus a little further up right next the Birkenhead North station these are just 2 of the many empty areas that should be developed first before encroaching on greenbelt.
DOR00716	These comments relate to the proposals for the parcels of land identified that are accessed via Pipers Lane. The majority of Pipers Lane currently isn't adequate to safely service the current number of houses on Pipers Lane or accessed via Pipers Lane (Pipers Lane, Warren Way, Pipers End, The Pipers, Redstone Drive and some small roads running off these). If the proposals were go ahead the high level of housing increase will, particularly at peak traffic times, create a totally unacceptable level of danger.
DOR00717	[SAME AS DOR00455]
DOR00718	I wish to express my concerns in relation to the plans to build on the green belt within the Wirral area. I attended one of the meetings which took place at Hulme Hall. I was informed that the Green Belt area to the East of the M53 would have restrictions lifted on the whole green belt area. I questioned as to why the whole area would have restrictions lifted when only a partial area would possibly be required to build upon. I was informed that this was to avoid a constant review of the green belt boundaries. I find this totally unacceptable. If only a small proportion is required, then only that area should be lifted. Agreeing to lift the restriction will only lead to large areas of the green belt being unnecessarily built upon. I also question the suitability of building close to a motorway. Living in close proximity to motorways have been medically proven to have a detrimental effect on the health of those living in such areas. This is another reason that I would object to the proposed building plans for the area.

DOR REF	RESPONSE
	<p>Although I acknowledge that some of the brown belt sites are not quite as easy to build upon, I feel that the Government should financially assist the council to make these areas viable. What else happens to these areas? They will sit looking derelict for many years and be wasted concrete spaces whilst our green areas are ever decreasing.</p> <p>There are other factors such as the road infrastructure, the actual need for so many houses in this area and various other concerns that I have for building in the green belt area. However, I am certain that these matters will have already been raised, as well as those issues that I have raised.</p>
DOR00719	<p>I write in connection with the proposed implementation of the Plan and in particular, the Allocations contained within the Proposed Development Options Review to which I strongly object. As the Council is aware Local Plans are required to meet the test of ‘soundness’ and should be positively prepared; justified; effective and consistent with national policy. The implection of the Allocations does not meet this test for the following reasons:</p> <ol style="list-style-type: none"> 1. The Plan appears to contradict the European Landscape Convention which prescribes that the Local Plan should include policies to safeguard and enhance landscapes. The implementation of the Allocations would clearly be of detriment to the local landscape which is viewed as a tourist attraction. As noted in the Unitary Development Plan, West Kirby is deemed to be within an area ‘where tourism development will be encouraged’. The development of the areas subject to the Allocations would not only blight the landscape but also put a strain on the already overstretched infrastructure. I cannot see therefore, how the Plan can be deemed to be ‘sound’ in this respect; 2. The Wirral SHMA and Housing Needs Study produced by Nathaniel Lichfield and Partners dated May 2016 and which forms part of the evidence on which the proposed Plan has been made was produced prior to Brexit. I cannot see that the Council has factored in the revised economic scenario and the reduced demand for housing within West Kirby and the surrounding areas. I would expect to see a new report commissioned which reflects current economic factors; and 3. The Draft Settlement Area Policy provides that one of the key priorities is to ‘preserve and enhance the character and appearance of the Conservation Areas at Hoylake, Caldy and West Kirby and the setting of other designated heritage assets; the woodland setting of Caldy and Newton; the visual importance of the natural open coastline; and open (hilltop) views across the Dee Estuary to North Wales’. The Allocations openly contradict this key priority as a number of the locations have direct views on to the surrounding coastline. As a result, I cannot see that the Plan is justified. Grange Old Road Allocations I know the proposed site which is subject to the Grange Old Road Allocations well and as above, I wish to strongly oppose to the development of housing at this location. I understand it has been brought to your attention that the junction between Grange Old Road and Black Horse Hill is a notorious accident black spot. There can be no argument other than that the development of the Grange Hill Farm would cause an increase in traffic which cannot be sustained by Black Horse Hill, Grange Road and most significantly Grange Old Road. In addition, you will note that Grange Old Road provides direct access to the War Memorial and allotments. An increase in the volume of traffic in this area would be dangerous. <p>I also understand that the land subject to the Grange Old Road Allocations is subject to a restrictive covenant which would prohibit the proposed development. Has the covenant been formally released? If not, has title indemnity insurance been incepted prior to the date of the publication of the proposed development? If not, the Council will note that it is likely that title indemnity insurance will no longer be available.</p> <p>On a personal level, I find it deeply disappointing that the Council seems to be uninterested in safeguarding the beautiful local landscape for future generations but appears to be more focused on short term gains. I would suggest that the Council look to brown field sites and urban infilling before developing green belt sites.</p>
DOR00720	<p>Whilst we deplore any future development of Wi1Ta! and ce1iainly the use of any Green Belt land we are particularly interested in the above plot of land in Irby which has been selected for further consideration. The housing stock proposed ranges from 44 to 85 properties depending on which report you refer to.</p> <p>This piece of land is not suitable for future development and should be withdrawn from the list due to the following reasons :-</p> <ol style="list-style-type: none"> 1. Access 2. Parking 3. Rights of Way 4. Biological Importance 5. Historical Interest 6. Wildlife 7. Public Transport 8. Traffic Congestion 9. Sewage Treatment Works 10. Agricultural Land 11. Local Facilities

DOR REF	RESPONSE
DOR00721	<p>Reasons are, There is sufficient land in urban areas available. 12000 houses are not now required. Increased traffic in an already busy area at peak hour. Loss of green belt land spoiling views. Please reconsider and use brownfield sites first.</p>
DOR00722	<p>The Wirral Borough Council's own estimates are that the population will decrease by 2.5% over the next 15 years. The proportion of the Green Belt that was included as available for development amounted to 22% of the total Green belt area. In considering whether such an imbalance can ever be appropriate it is necessary to take account of the local situation and local factors. National Statistics covering a range of different areas with different needs are no substitute for proper examination of what is actually required in Wirral. In the period since the 2001 assumptions that the population would rise have proved to be wrong. Predictions made in 2001, 2012 and 2014 assumed a population increase. In fact there has been a net decrease with negative net migration. The correct approach now would be to rely upon the actual up to date figures which do not support a need for any substantial increase in housing provision. The Office for National Statistics figures suggest that over the next 25 years there will be an increased need for suitable housing for the elderly and disabled and their requirements may change. That may mean a greater need for flats, apartments and sheltered accommodation. Thus the need may be inflated by the necessity of providing accommodation of that sort for such households. It may be that the Wirral situation, bounded by water on 3 sides and with a reducing population amounts to "exceptional circumstances" when considering the question of "need". The Wirral Borough Council believes that, despite the population reduction there is a need to replace some existing stock and for building to enable downsizing and for those with disability suggesting that this need for housing is expected to increase. The Wirral Borough Council say that 7320 homes will be required over the next 15 years. Taking that figure, although others have calculated a lower figure. Around 3100, can be built on Brownfield sites, making a generous allowance for those sites which present difficulties as a result of contamination. The Wirral Borough Council currently bring around 260 houses back into use each year as a result of restoration and refurbishment. That will continue but it is to be hoped that the program for doing so will reduce the number over time. If a generous adjustment is made to that figure some 2000 houses are likely to be brought back into use over the period. Peel Holdings at Wirral Waters will provide 842 over the next few years. Although there is a planning consent for 13000 housing units there is no clear indication of the long term prospects. This produces a total "shortfall" of 4258 over the 15 year period. In effect 283 houses per annum. That, however, is subject to some further considerations, Second when considering what land is available for development there is need to take account of the impact of "land banking". No account of that seems to have been made. How much land for development is owned with planning consent but not being developed? The National Planning Policy Framework now looks to houses built rather than planning permissions granted. Thus planning consents granted cannot count towards the numbers available. But since that land will be developed at some time during the period land upon which planning permission has been granted but which has not yet been developed should be included in the "Windfall" adjustment about which more below. Windfall sites. The Wirral Borough Council has provided for only 60 sites per annum becoming available but which were not foreseeable. That is unrealistically low and does not take account of what is actually happening. I have referred to "land banking" sites above. Such sites will become available within the 15 year period and their proper inclusion would increase the "windfall" provision. As the computation has not been done it is difficult to estimate the impact but a notional reduction of 5% may be appropriate. Further no account has been taken of the many examples of single large properties being sold and then developed as sites for multiple occupation either as houses or more often as flats or apartments. "Windfall" sites should reflect these additional sites coming up for sale and redevelopment as reducing the total calculated need. There has been a trend towards this for some years which has gathered pace recently. There many examples of a single household disappearing to be replaced on the site by multiple flats, apartments or houses.</p> <p>In Heswall alone there are currently a number of such schemes with four large properties set to provide some 30 new households. There are other developments where large properties are being demolished and a number of smaller houses developed on the sites increasing the number of houses still further. This is replicated across Wirral. The likelihood of further such schemes must be regarded as "windfall" and must be taken into account when the actual figure for new households needed is considered. There is every reason to believe that schemes of this sort will continue into the future across the Borough as older householders sell larger plots. Including a "windfall" provision for 60 per annum is far too low. An overall figure for "windfall" of 200 housing units per annum is a very conservative estimate.</p> <p>If these further matters are taken into account the annual shortfall drops from 283 to, at most, 22. It is arguable that there is no shortfall at all.</p> <p>Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. The Wirral Green Belt was last reviewed in 1983 with some minor adjustment in 2000. It includes 45% of the land in Wirral. This is a bastion protecting the countryside and thus the very nature of Wirral. There is already a larger proportion of developed land in Wirral than in other comparable areas. The initial proposals made by the Wirral Borough Council involved substantial encroachment on the Green Belt, some 22.5%, and it is to the aspect of encroachment that this Part of this response is directed. In an area such as Wirral the facility and attraction provided by the Green Belt is of great value to the whole community encouraging recreational pursuits and attracting tourism. In the absence of a significant need for the building of new housing the situation falls to be dealt with under the principle that the construction of new buildings is inappropriate in Green Belt and should not be allowed. None of the exceptions that might permit development in the Green Belt applies. The farmland between</p>

DOR REF	RESPONSE
	<p>the Wirral Way and the coast is of special significance as open land of which there is a limited amount in the Heswall area. It is prime agricultural land currently in use as such. The acreage of farmland far exceeds the very small acreage occupied by the existing properties some of which have been in situ since the 19th century. The small number of existing properties, well-spaced apart, do not detract from the rural nature of the area and the "infill" concept certainly cannot apply. Development of "villages" would be inconsistent with the rural nature of the area, detrimental to the wider area, damaging to wildlife and, in reality, merely a vehicle for avoiding the protection afforded by Green Belt status which has, quite properly, been retained. Filling in between existing roads would, in reality, be destroying that area of Green Belt and coastline in a "backdoor" fashion. What appears to be suggested is not "limited infilling in villages" but large scale development. The current suggestion of "infill" or "infill villages" would clearly contravene the need to preserve the Green Belt against clear, obvious and unnecessary detriment. Wildlife thrives along the coastal strip. There are badgers, a protected species, bats, again protected, nesting owls, buzzards and many smaller nesting birds, invertebrates and reptiles. Peregrine Falcons are seen regularly. Substantial numbers of wildfowl and wading birds feed on the Estuary and on the coastline in this vicinity. The Estuary is a major area of international significance for migrating birds, particularly waders and the impact and disturbance of development on the coast line, such as building works, introduction of residential properties and attendant traffic, together with likely weedkiller/fertilizer seepage and increased human presence, both on the shore line and on the shore itself, would be substantial. The importance and significance of the wildlife and its preservation is reflected in the inclusion of the Estuary, marshes, wetlands and coast line, as a Site of Special Scientific Interest protected as such.</p> <p>The Estuary, including the areas mentioned above, is also included as a Special Protection Area under the European Birds and Habitats Directive and is included in the Ramsar Wetland Convention. These are an indication of the importance of the West Wirral Coast to the wildlife not only of those species resident in the UK but also those species who migrate annually to and from this special area of coastline. The land uses are settled and long term. Any development of these areas would have an adverse effect on the Wirral's agricultural resources as a whole and would prejudice the continued productivity and viability of those holdings. The arable fields are well tended and in continuous cultivation producing crops. The Livery Stables are an important amenity, both for those who use them and for those who make use of the adjacent Wirral Way where the presence of horses and riders enhances the enjoyment of visitors. That there are major infrastructure concerns about development in these areas in addition to the Constraints referred to above is an important additional consideration. The current roads are inadequate to cope with an increased volume of traffic. Wittering Lane is too narrow and twisting for any additional traffic, indeed it could be argued that it should be "access only" now. Traffic access to Wittering Lane is very restricted. At the Parkwest end access is very limited with existing properties right up to the junction. It is used by residential traffic from Parkwest, Wittering Lane and Farr Hall Drive together with traffic from the Livery Stables at Dee Farm. In addition the access to the Wirral Way, situated at the junction, used by walkers and cyclists, is already a hazard. Traffic enters the junction from four roads each of which have blind spots on approach. Cyclists entering and leaving the Wirral Way turn across the flow of traffic and are not always readily visible or sufficiently careful. The Delavor Road end of Wittering Lane is on a sharp bend immediately after the former railway bridge over the Wirral Way. Visibility is restricted and, in the event of increased traffic, there is no sufficiently safe access to and from Wittering Lane.</p> <p>Pedestrians, including families out walking, cyclists and horse riders use both the junction with Wittering Lane and the nearby access to the Wirral Way in Broad Lane. A clear additional hazard would arise from increased traffic in that vicinity. The roads through Lower Village and down towards the Dee are already used to capacity. The junction giving access to Delavor Road is subject to high traffic levels. The turn from Delavor Road into Thurstaston Road is narrow and congested. Delavor Road is steep with a pronounced bend on the approach to the former Railway Bridge and Wittering Lane impeding visibility in both directions. Thurstaston Road and Dee View Road/The Mount are narrow, twisting and frequently congested: quite unsuitable for any additional traffic. At the other end Station Road bends sharply. It is frequently congested now. There is restricted visibility for traffic emerging from Station Road into Village Road creating a hazard. Davenport Road is often congested and its use by large numbers of walkers and cyclists riding along the Wirral Way, which makes use of the road at this point, and the presence of horses and riders creates an additional hazard. Davenport Road is at capacity now, particularly in the evenings and at weekends. The bends at the northern end of Lower Village where Village Road becomes Thurstaston Road are severe and already hazardous. Traffic through Lower Village itself is at maximum capacity and exceeds that on weekday mornings and evenings. There are Primary Schools at both ends of Lower Village resulting traffic hazards and in the presence of young pedestrians through the Lower Village area. St Peter's Church is situated in the Lower Village and its regular use for Church services on different days and at differing times of the day creates further pressures. Many pedestrians use and cross the narrow congested Village Road. There are concerns about facilities for water and sewerage. The current system just about copes although there have been problems in Parkwest in recent years. The present facilities would not be adequate to handle greatly increased usage and neither the water/sewage facilities in Riverbank Road nor Target Road would cope.</p> <p>The area is at the foot of a hill making for additional problems with water and sewage services. The risks of foul waste pollution and flooding by groundwater would increase substantially if there was increased demand or usage. Local shops and schools are not adequate to cater for an increased population. The two Primary Schools in Lower Heswall are already full and gaining entry can present problems for the current school age population. There are now few shops in Lower Village. The Post Office and Pharmacy have both gone. There are inadequate parking facilities. There is no current capacity to satisfy the needs of an increased population. Of course there must inevitably be a risk that the demands of an increased population, a greater volume of traffic and higher numbers of pedestrians in the Village would present safety issues and effect the charm of what is rightly recognised as a Conservation Area. The public transport is inadequate. A small bus runs at each end of the area providing a "feeder" service to Heswall bus depot. For most of the day there are no services passing through the Lower Village linking the Lower Village with other areas or places where the population would likely be employed. This has the effect of increasing the need for cars when many efforts have been made to reduce car usage. Subsidies for decent bus services have declined over the years. The railway station is some distance away with no linking bus service. Notwithstanding that the intention of the government now appears to be taking traffic off the</p>

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	<p>roads moving an increased population in and out of the Lower Village area by public transport would be problematical and increased traffic inevitable. As an aside it is fair to say that the whole Heswall area has expanded greatly in recent years and a general consideration of the area's ability to cope with an increased population is necessary. Now traffic through Heswall is substantial, with regular congestion at the traffic lights on Telegraph Road; parking is at a premium and pedestrian usage is heavy.</p> <p>The Green Belt is a precious asset for the benefit of the whole community. The Wirral Borough Council should hold the line between the local community and the political interests of Government and the commercial interests of developers neither of whom pay much regard to the interests of the local community. Avoiding destruction of the Green Belt should be a priority. The encroachment onto the Green Belt today may be the Brownfield site of tomorrow. Once gone the Green Belt areas are lost for good. Whilst Constraints may be imposed in relation to particular locations but they may not provide the protection necessary in those areas when political and commercial pressure is applied. In the long term interests of the Wirral, its residents, and its visitors who enjoy all kinds of recreational pursuits visiting areas where the intrusion of urban development is minimal more not less stringent control is required. The Wirral's west coast is separate and distinct. It has unique qualities. It is important both nationally and internationally. It is already an area visited and used by the Wirral and wider community taking advantage of the opportunities it provides for recreation and taking other interests in all that the area has to offer. The infrastructure supports tourism and visitors but would not support development. It should remain within the Green Belt assessed as not suitable for development of any kind. No exception justifying relaxation of the Green Belt restriction applies.</p>
DOR00723	[SAME AS DOR00455]
DOR00724	<p>I object to the Wirral Council plans to use greenbelt land to build dwellings. Use of greenbelt land will result in more congested roads, poorer air quality, reduced open spaces, oversubscribed local services and create urbanisation harmful to mental and physical health.</p> <p>On a point of law the figures originally specified for the required new build of dwellings have been changed and I/we consider this has fatally flawed the required public consultation/engagement and confused many Wirral Citizens.</p> <p>Also if Peel were to use Wirral Waters to the full to build dwellings, as apparently originally promised when granted planning permission, this would negate the need to build on Wirral greenbelt. What is being done about this issue?</p>
DOR00725	<p>"Given the above I submit that release for housing development on Green Belt Parcel SP043 is harmful and totally at odds with the council's own development objectives and criteria and therefore is irrational. I ask the council what 'very special circumstances' outweigh the harm described above? If the answer is: necessity forced on the council, my enclosed submission challenges that claim (1). The council has repeatedly argued in the media that they 'have no choice' but to field sites for development. I submit that if a truly necessary few percent of Green Belt 'release plan' land eventually needs to be selected for development it would be perverse and irrational to develop land parcel SP043 for the strong reasons given. Any such release would be challenged on these grounds. We note the options 40.1 / 40.2 discussed in the Initial GB Assessment just released, to include SP043 in a group of parcels SP038 – SP046 which would destroy the GB corridor east of the M53 and threaten Dibbinsdale SSSI and the quality of life of thousands of Wirral residents in a single action. This would be not only unnecessary and irrational but insane.</p> <p>[Site representation received noting several criteria including issues on] [Environmental Protection & Enhancement] [Wirral Council Housing Strategy Numbers] [Flooding & Natural Hazards]</p>
DOR00726	[SAME AS DOR00346]
DOR00727	[Enquiry not a response]
DOR00728	<p>We note the proposed mixed-use allocations with residential, on sites ref: SHLAA 2007, 2008, 2009, 2010, 2096, 2097 in close proximity to our premises, and we support these in principle. We welcome in particular housing, community facilities and appropriate commercial investment.</p> <p>The future of this area will have a significant impact on Moreton as it is the only major development opportunity close to the town centre. It is therefore vital that the Local Plan encourages development which will have a positive effect on the town, and does not simply provide land use allocations.</p> <p>We consider that the Local Plan should make it clear that any redevelopment should:</p> <ul style="list-style-type: none"> • Be comprehensively designed and delivered across these various sites and not allowed to be disconnected and piecemeal • Integrate with the surrounding existing developments • Facilitate continuity of the local community services currently within the sites • Promote a healthy community in Moreton • Be guided by an overall set of development and urban design guidelines set out in a development brief and if possible Supplementary Planning Document to ensure that new development meets the highest standards in terms of layout, access, built form, landscape and sustainability • Provide strong street frontages, convenient pedestrian connectivity and scale & massing which enhances and complements the surrounding area rather than repeating the piecemeal single storey development which currently characterises the site.

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	<p>We would draw your attention to the extremely busy and at times dangerous junction of Pasture Road and Maryland Lane, and ask that this is taken fully into account through any transport assessments when planning the vehicle access arrangements for these sites.</p> <p>We note that the Library and Children's Centre sites are included in the allocations, but not the Ambulance Station. We consider there would be benefits in considering the redevelopment of the Ambulance Station as an integral part of this development.</p> <p>We should like to be consulted further on the formulation of detailed proposals for these sites and consider that proactive community engagement on options for development will be both vital and helpful. Being located adjacent to the site and with a range of suitable meeting room spaces we would be happy to host any such consultation / engagement sessions.</p>
DOR00729	<p>I am writing to advise of my objection to the potential release of Wirral's Green Belt land for use as building plots.</p> <p>I object on the following points</p> <ul style="list-style-type: none"> • Wirral is a specific case due to its location surrounded by water on three sides the council should be challenging the exaggerated Government housing figures and the amount of land to be utilised. Wirral population has been static for many years there is no need for all this building work. • Brownfield sites should be used first. • Wirral infrastructure would require major investment to cope with the additional 12,000 properties. • Valuable agricultural land would be lost and this cannot be replaced. • Vehicle pollution and congestion would increase from all the additional properties • Destruction of wildlife habitat <p>I am strongly opposed to building on any Green Belt Land but in particular the 3 large plots being considered further in Irby - the land behind Irby Hall, the land running from Irby Road through to Harrocks Woods and the plot on Thingwall Road.</p> <p>We need to save Wirral's Green Belt, once it has been developed it will be lost forever</p>
DOR00730	<p>Please could you let me know which field you are looking at building on that backs onto Seabank Rd Lower Heswall/Riverbank Road as there is a badgers set on the larger field which is protected. I do think it's awful that you are looking at building properties on these fields as they won't exactly be affordable homes in this area for people will they, or will you bring the price of our houses down because of this? If so we would be seeking compensation from the council, I don't see you building in your areas.</p>
DOR00731	<p>The idea of building in this area apart from the emotional side on the practical the areas involved have no access and exit facilities for large vehicles to enable building there is a national trust site at Horrock's wood and a pond and wildlife area the amount of wildlife frogs bats and newts and more apart from being protected it would be against wildlife protection to build in this area. You need to consider all the brownfield sites as your main focus for building and leave green belt for what it is intended keeping nature and not creating urban sprawl. This is what makes the Wirral so special.</p>
DOR00732	<p>I understand that certain areas are to be removed from having dedicated Green Belt status and thus long term security. It appears that within the proposals contained in the initial Green Belt Review Background Report 2018 highly valued and deeply imperative areas of Green belt land will be re designated as simply 'Protected' with a commitment from the present planning leaders that these sites will not be used for anything other than 'green applications'.</p> <p>We feel this is a grave and dangerous mistake and in many ways is a betrayal of the duty you have in investing in the environment and quality of life opportunities afforded to future generations. Put simply, the commitment and assurances you can give today under Protected status are the commitments and assurances that future leaders can disregard and alter still further. Indeed, by seeming to play with semantics you are really just creating the thin end of a wedge. History shows us that human nature is well meaning but there are those who may seek to seize this wedge in the future, and drive it into the heart of everything the Wirral represents today.</p> <p>This is not about house prices or land values, this is about quality of life and our duty to do everything in our power to invest in our environment; not destroy it.</p> <p>Hence, we would urge you deeply consider the changes you make to our Green Belt. Naming sites Protected is simply not the same, and unless you are prepared to follow the heartfelt wishes of the public you represent, we will potentially face a very clear and defined danger of losing our community which is envied by others and loved by those who are fortunate enough reside there.</p>
DOR00733	<p>[SAME AS DOR00455]</p>
DOR00734	<p>It is inconceivable that Wirral's Greenbelt could be ripped up, in a knee jerk reaction to solve the UK housing problem by building an excessive amount of new homes, many of which may not be needed for this area in isolation. This could potentially ruin the beautiful countryside and alter the makeup of the area irretrievably.</p> <p>Our objections are:</p> <p>The development of Brownfield options have not been fully explored and errors made in WBC's consultation process, resulting in reductions of availability, instead of identifying new sites.</p> <p>WBC's 2016 report contains Council provided growth assumptions which have proved to be exaggerated for the Local Plan system.</p> <p>The local factors (Wirral being a Peninsular) with historic features and unique location have not been stated.</p> <p>Peel Holdings need to be held to account for the lack of progress of new homes on Wirral Waters and help/assurances given to accelerate the process. Surely a time scale was agreed, with regular</p>

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	<p>checks to the agreed progression at the time of signing the contract for targeted new homes??</p> <p>The infrastructure is insufficient for roads, transportation, schools, health etc. to support an increased population.</p> <p>There would be an adverse effect on the environment with additional pollution, light, noise etc.</p> <p>With regard to our own village (Irby) many of the fields are currently farmed, producing food crops, which maybe of greater importance after Brexit. The minor one way system would be stretched to cope with extra traffic. There is no rail link and minimal bus services; connection to West Kirby severely restricted with the collapse of Avon and route 88. The countryside is used extensively by ramblers and dog walkers. The high Council tax and living costs, make Irby less practical for affordable social housing.</p> <p>We believe that in the absence of a Local Plan, this process is now being rushed through and the Green Belt provides an easy option, when it needs preserving. The new home figures, need to reflect the lower local population growth. With sufficient time and consultation, plus an updated commitment from Peel Holdings and reassessment of Brownfield sites it has been suggested that more realistic housing targets can be met without touching the Greenbelt which defines the wonderful Wirral area.</p>
DOR00735	<p>According to the Visit Wirral website Wirral is a “peninsula blessed with stunning natural splendour.” Maybe not for much longer.</p> <p>The OED definition of Green Belt is an “area of open land designated for preservation”. Wirral’s Green Belt may no longer be preserved.</p> <p>At the presentation that we attended the “Five purposes of the Green Belt” slide was displayed very briefly. Interestingly it was not read through carefully like the other slides. Maybe because building on Green Belt land would go against these very purposes -</p> <ul style="list-style-type: none"> - “the unrestricted sprawl of large build-up areas” - “neighbouring towns merging into one another”. (No mention of “zones” which was Council justification.) - “safe from encroachment” - “setting and special character of historic towns would not be preserved”. <p>The map presented was confusing and misleading. Many of the areas of Green Belt are obviously unsuitable for building due to being already used for golf, parkland or reservoir. These areas were not identified and displayed. This results in certain areas being much more vulnerable. Indeed perhaps the areas developers have chosen to build very profitable houses on are already allocated!</p> <p>When I looked on the Council’s own planning website recently there is now an advert for Barrett homes!</p> <p>After attending the “consultation” we searched online and have been unable to find a copy of the paper map that was displayed on tables only. This alarming map identified boundaries in Green Belt areas where owners have agreed to sell their land to developers. These are the areas that should have been displayed clearly on a slide and identified as at risk.</p> <p>A clear map showing Green Belt areas for being considered for building and where owners have agreed to sell to prime developers should be published in newspapers. Instead these worrying maps are absent from the very difficult to negotiate website and not displayed in libraries as we were told at the “consultation meetings”. Everyone in Wirral should be shown these extremely alarming maps before the Green Belt is lost forever!</p> <p>The Secretary of State wrote in May 2018 that Wirral was “.....not an area of high housing pressure.” However despite the recently revised ONS population figures, the Council seem determined to take the easy and lucrative option of building on our beautiful fields, rather than investing time and money in ensuring that the brown field sites are built on.</p> <p>The five purposes of the Green Belt have been displayed by the Council at public meetings but they intend to ignore this National policy and despite the plentiful building opportunities offered in brown field sites will deliberately destroy our green belt.</p> <p>The Government explain that Green Belt boundaries should only be altered where exceptional circumstances have been “Fully justified and evidenced”. Wirral Council have not provided evidence and justification demanded and thus should not build on Wirral's Green Belt.</p>
DOR00736	<p>I am strongly opposed to building on green belt land on Wirral, particularly around Heswall and in the marked zone 4. I have lived here most of my life and enjoyed walking, running and cycling through the green belt area. I now have a young family and we enjoy the same. As a local [health worker], I see first-hand the problem we have with childhood obesity and we need to be encouraging enjoyment of the great outdoors and preserving the green spaces where this can happen.</p> <p>Furthermore, the need for affordable housing in parts of Birkenhead is much greater than the need in more rural areas of Heswall and West Wirral which is also much further from better infrastructure and jobs. I encounter patients on a daily basis in Birkenhead who have been on waiting lists for housing for years. To choose to build away from this area is neglecting their needs and contributing further to unacceptable health inequalities.</p> <p>In my opinion, it would be an irreversible tragedy to make such an irresponsible decision as to build on greenfield sites in West Wirral.</p>

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DOR00737	<p>I write to object to the proposal that green belt land surrounding Lever Causeway in Bebington, Wirral is released to allow building on it.</p> <p>I object on the following grounds:</p> <ul style="list-style-type: none"> • There is sufficient brown land sites in urban areas of the Wirral to build upon, for example a large area of land around the dock area of Wallasey is yet to be built on • The proposals will fundamentally change the character of the area. • The area around Lever Causeway is an area of relaxation for Wirral residents for walking, cycling, running and horse riding, it therefore provides health benefits in terms of physical and mental well-being for local residents. I suspect that this plan does not fit with other local plans in relation to improving the health of the local population. • Once this green belt space is lost it will be gone forever. • The development is unnecessary, I understand that the population projections used to evidence the need for the building work are not correct. <p>I feel very strongly that these proposals would be to the total detriment of the area, I have never written to my local MP before but have copied him in to this email so that he is aware of the strength of feeling in the area against this proposal, and in the hope that he can also lend weight to this objection</p>
DOR00738	<p>I am writing to inform you that I object to the use of the green belt by Greasby Junior School. I am an ex pupil from the school myself and understand the importance of that space, and the environment to the school and all of its pupils.</p>
DOR00739	<p>It defies logic that in an area (I define as to the North (NNE) of the M56 divide) which is in so much need of rejuvenation, we are going to spend money destroying the few remaining green belt areas.</p> <p>Surely both sides of the political divide must be pledging to improve Birkenhead and numerous other Brown Field sites before they build new houses on Green Field? The Birkenhead waterfront must be considered a prime area for building new properties with views of Liverpool, or are the council too ignorant to understand this – or potentially worse, priming themselves to sell off the land to private investors and pocket the proceedings?</p> <p>If the council want to stop the decline of the historical centres on the Wirral, they need to make sound investments in those areas, create modern housing and a modern support network around them. You don't build on green field sites with limited road access and limited facilities, then go crying to central government over the decline of the inner city, congestion, limited school placements and more money to control areas that have become "No Go" areas.</p> <p>This consideration has undertones of closed door dealings with various key players on the Wirral set to improve the wellbeing of the few at the expense of the many. But then, sadly that does seem to reflect the state of politics in the UK.</p> <p>Do the right thing. Invest on improving the Brownfield "District 13" sites of the Wirral and leave the Greenfield sites to provide a breath of fresh air for all to enjoy. Even the local taxi drivers blame the council for the continued downward spiral of Birkenhead and turning it into a "District 13 – No Go Area". They are grass roots people.</p>
DOR00740	<p>Residents were told that the flooding issues were caused by the drainage system which was built in the 1930s and 1950s being unable to cope with the volume of water in heavy downpours. There is also an issue with water running off the farmland which is now being proposed to be built on.</p> <p>At the meeting we were told that even micro developments such as the trend for people to pave over their drives was contributing towards the flooding. So if the drainage system is unable to cope now, and paving over drives is worsening the problem, how much worse is the flooding likely to get if the open farmland is concreted over and replaced by 200-300 houses? There will be far less open land to absorb rainfall, and increased pressure on a drainage system that cannot cope as it is. And given that the Council is well aware of this issue, why is there no mention of it in the summary documents prepared to date?</p>
DOR00741	[A query not a response]
DOR00742	<p>Wirral residents were angered by the potential loss of Green Belt, and in the Clatterbridge area in particular by the threat to land at Claremont Farm. If the land remained in the Green Belt with no planning application there would be no issue. This land in the Green Belt is integral to the farm, and taking it away brings the viability of the whole of Claremont into question.</p> <p>Agricultural Land - The national Agricultural Land Classification (ALC) provides a method for assessing the quality of farmland to enable informed choices to be made about its future use within the planning system and classifies land into five grades, with Grade 3 subdivided into Subgrades 3a and 3b. Land within Grades 1, 2 and Sub-Grade 3a is considered to be the best and most versatile and proposals that are likely to affect best and most versatile agricultural land must be notified to Natural England</p> <p>A Natural England survey (attached) states that our land is "best and most versatile land". This land is important for winter educational visits/welly walks where children can learn about vegetables and see them growing first hand. In these days when some people hardly know their neighbours our hosting of Vintage Car Shows, Dog Shows, Children's Fun Days etc not to mention many Charity events, have helped to make us a local community hub which is much appreciated by the people in this area, and beyond.</p> <p>This part of the farm is also integral to our Higher-Level Environmental Stewardship Scheme agreement, which works on a point's basis. Many of our points are gained in this area of land from infield trees and ponds, field corners, grass buffer strips, hedgerow management etc. If we lose it we will no longer have sufficient points to stay in the agreement and will also lose the right to offer 70 FREE school visits every year to local school groups. Some of our paths have been given "Permissive Path" status to allow people to enjoy walking in the countryside. We employ 50 + people. A farm</p>

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	<p>shop in the middle of a housing estate would not have the same appeal. Their jobs would be threatened. There is a reason why Bebington was voted the most desirable postcode in the UK to live. Wirral is known for its green spaces and to take that away unnecessarily would be a travesty. Do we need to mention the obvious traffic issues on Brimstage Road and the Clatterbridge roundabout? Nothing is more frustrating than knowing that there are many brown field and more suitable areas where houses could be built, which are not being used, for whatever reason. We have written to the Trustees expressing disappointment that after the 4 generations of our family who have lovingly cared for their land, they are now considering selling it for development, which would deprive us of our livelihood and the local people of all the benefits that the land brings. Let us hope the Council make the correct choice, not to allow unnecessary building on our Green Belt.</p>
DOR00743	<p>Parking: The area is already congested with regards to parking. The section of Devonshire Road which adjoins the development regularly has cars parked on the pavement. I suggest that careful consideration needs to be given to providing sufficient on-site car parking for any proposed development. In close proximity to the proposed development site is St Mark's Court. This comprises 24 units. It currently has on-site parking for at least 24 cars. I suggest that this is a suitable comparison for any proposed development. If the development cannot accommodate parking for its own residents and visitors, then measures are needed to safeguard the existing resident's ability to park close to their property.</p> <p>I suggest the following are important:</p> <ol style="list-style-type: none"> 1. The development is able to accommodate (on-site) a least one car per household. 2. Resident-only parking be considered for the neighbouring roads (Grosvenor Road and Devonshire Road, in particular). 3. Double-yellow lines should be considered for the length of Devonshire Road that adjoins the development - so as to dissuade pavement-parking. <p>Height of the proposed development: Any development should be a maximum of 3 storeys and no higher than the surrounding buildings. In this regard, note should be taken of the gradient of the ground, and the fact that the elevation on the Devonshire Road side of the development is higher than that on the Grosvenor Road side.</p> <p>Other matters:</p> <ol style="list-style-type: none"> 1. The area is noted for certain anti-social activity: <ul style="list-style-type: none"> • On-street drug-dealing (reported to the police) • Dog-fouling • Pavement parking • Littering • Fly-tipping <p>There is problematic fly-tipping in the area. This does not just affect the triangular piece of land which is part of the development, but surrounding roads too. Items of furniture and refuse are regularly deposited on the roads / pavements around the proposed development. A particular problem is the social housing which occupies the middle block of Kenyon Terrace. Green and Grey bins are often left on the pavement, overflowing or not collected because they have been filled incorrectly. An additional 19 units will add further pressure to this - the same problem cannot be repeated with this development. The plans should be required to address these matters through the following:</p> <ul style="list-style-type: none"> • CCTV • dog-fouling signs and bins • appropriate parking restrictions • industrial waste collection provision (not green and grey bins per flat) 2. St Mark's Court is the most comparable development in the locality. This should be used as a guide to the parameters of the new development. Most notably, its provision of on-site parking (at least one space per flat), its height (3 storeys), and its sympathetic-to-its-surroundings appearance. 3. Reference is made to a planning permission granted 12 years ago for this site - that development was for 8 apartments - a much more reasonable number for this plot of land. Crucially, that development was three storeys above ground, and made provision for underground parking (presumably, sufficient for all residents). 4. Planning permission was recently denied for this site. The objections to that planning application need to be fully taken into account. 5. The site is near Kenyon Terrace - a listed building. With respect to any development, there needs to be full analysis of why the new development does not affect the listed properties. It appears to conclude that because the building can still be seen, it is not affected. I would suggest that one of the architectural features of the listed building is its 'prominence' - they were built so as to be the predominant feature in the area. As a result any building that is erected nearby will compete; the larger or closer the new building, the more likely it will detract from the status of the listed buildings. 6. According to surveys, Kenyon Terrace has an (imperceptible) lean forwards. This is on account of its age, and the weight of the materials from which it is made. I am concerned that any development or excavation work in close proximity to them might affect Kenyon Terrace. The developer should fund an independent structural surveyor to monitor Kenyan Terrace throughout the course of the development and advise accordingly.

DOR REF	RESPONSE
	<p>7. Traffic - the stretch of Devonshire Road which borders the development is prone to speeding cars driving up from Grange Road West. This should be addressed - making it no entry at that end, or including speed bumps.</p> <p>Concluding remarks: My concerns are with any development that tries to squeeze too many units into the available land, and, by doing so, puts pressure on the surrounding area. Given the size and shape of the land, 19 units is excessive. The siting of the development is also critical given its proximity to Kenyon Terrace and the impact it will have on those listed buildings. Detailed analysis of this is required. The fabric and appearance of any development must be sympathetic to the area - this has been attempted with St Mark's Court which has architectural features that mirror surrounding buildings.</p>
DOR00744	<p>Firstly, I would like to question the methodology used for identifying the Green Belt land for the housing project which you refer to in Briefing Session: Development Options Review (September 2018, slide 5). There could have been more than one methodology - each would have resulted in a different outcome. Please provide evidence to confirm the methodology used by the Council has provided the most reliable outcome, alongside information on who sought this methodology - the council or the planners? The council, in proposing a large area of Green Belt land to develop in Mid and South Wirral, knows very well that a significant portion of this land cannot be developed for various reasons (Storeton Woods, Golf courses) thus leaving a few specific pockets for development. This appears to allow the council's proposed methodology (of enclosure and clear boundaries surrounded by houses) to be successfully applied for these selected sections of land. We were told that this methodology was subject to public consultation. I would like to request information on whom the stakeholders are who were approached for consultation, as this was not widely publicised. Certainly most members of the public who were present at the Hulme Hall consultation 10/09/18 were not aware of this consultation. I was told by the speaker that I would receive further information by email but I have not received any.</p> <p>Secondly, I must question you [council officer], is the cabinet rigorously confident about the reliability of the advice they received from the civil servants undertaking planning and forecasting? Please provide evidence. The high number of 12,000 houses in Wirral are not needed - the population projection does not warrant this figure as it is in decline. The council must statistically challenge the government about the figures they have suggested. Peel Group have indicated that with the support of the council they will build 6,450 houses in the next 15 years. The council must encourage the development of Wirral Waters that will provide houses, commercial regeneration and employment, similar to that in Liverpool waters, and in keeping with NPPF Item 134 e (2018), "The greenbelt land serves to assist in urban regeneration, by encouraging the recycling of derelict and other urban land". Peel Group have already got outline planning permission to build 13,500 houses on Wirral Waters granted in 2012.</p> <p>They have applied for 4-5 planning permission requests since March/May 2018 and so far this has not been approved yet. The quoted shortfall calculation of 7,390 houses, slide 17 in Briefing Session: Development Options Review (September 2018), is inaccurate, as it includes the 20% buffer for under delivery. The 20% buffer should be deducted from the total final figure of 7,390 (Briefing Session: Development Options Review, September 2018), and should not be in addition to the estimated total. During the Hulme Hall consultation, September 2018, we were told that some of the brownfield sites cannot be used for building because they are contaminated. This violates paragraph 118 c of NPPF 2018: "Planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land". We were also told during the consultation, September 2018, that small sites in certain areas (e.g. Wallasey) are not commercially viable for investors. This violates paragraph 119 of NPPF 2018 "Local planning authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including suitable sites on brownfield registers or held in public ownership, using the full range of powers available to them". The land on Lever Causeway is high quality agricultural land that produces regular crops twice per year. Acres of prime agricultural land will be lost. This land should be kept as such and not used for building in line with paragraph 170 b, NPPF 2018. I request to see recent evidence of adequate site investigation and information, prepared by a competent person, for the proposed and the excluded sites.</p> <p>Encroaching on this Green Belt parcel would violate chapter 16, NPPF 2018, "Conserving and enhancing the historic environment". The Lever Causeway and surrounding areas have a unique cultural and historical heritage related to Port Sunlight Village. Storeton is a historic hamlet which will be directly affected by any building on Lever Causeway.</p> <p>This will cause irreparable damage to its setting. The proposed destruction of Green Belt will also have a damaging effect on Mountwood Conservation Area as it will destroy its setting Mount Road's elevated position currently provides unrivalled views across to the Welsh Hills with expanses of rolling countryside which will be lost forever. Lever Causeway and its open spaces provide an area for relaxation and exercise for innumerable local residents. Any building would cause substantial detrimental visual impact on the remaining Green Belt. This will fundamentally change the character of the area. There is also a risk of increased traffic and major congestion.</p> <p>The benefit of Green Belts are as vital as ever and by looking at other countries, we can see that without the strong protection it offers against most forms of development, more valuable countryside would be consumed by urban sprawl and the 'special character' of Wirral would be irreversibly eroded. The sites either side of Lever Causeway are huge. Once released from Green Belt, building could extend to Storeton, causing unrestricted sprawl, with historic Storeton and Bebington merging. This would result in huge violation of chapter 13 NPPF, "The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open".</p> <p>If we loosen our Green Belt controls or de-designate large areas of it, we would simply allow more land to be built on where developers can make maximum profit, as has been the experience of other countries in Europe, particularly Spain and Ireland (Irish Times, 2006, 'Dublin is cited as worst-case scenario of sprawl.')</p> <p>1. Green Belt Parcels SP030 to SP055.</p>

DOR REF	RESPONSE
	<ul style="list-style-type: none"> • The contiguous areas of parcels released fails to comply with Paragraph 134 of NPPF. It classically represents major prospects to avoid unrestricted sprawl of built up areas and defines intent to merge neighbouring towns. Please pay attention to NPPF cautionary message in Paragraph 135 “Once Lost-Lost Forever.” • Green Belt Parcel SP030 includes Prenton Golf Course, Prenton RUFC, Prenton Golf Driving Range, Marsh Hey Covert, Cow Hey Covert and the Roman Road which forms a much used right of way from the Lever Causeway, across the golf course and into Prenton Dell. It is unexplainable why no “Protection Notes” are assigned to this parcel. Any encroachment on these open space and recreational facilities is a clear violation of Paragraph 97 of NPPF unless the Council intend to replace such facilities by equivalent or better facilities. • Core Strategy CS6 i.e. preservation and enhancement of character and appearance of Mountwood is jeopardised with the inclusion of SP030 in Settlement Area 3. • Core Strategy CS7 (Area 4) related to local distinctiveness of Eastham Village and Storeton and physical separation with urban areas of Ellesmere Port is violated. • Core Strategy CS11 (Area 8) undertaking to preserve and enhance the rural character of smaller settlements – Brimstage, Raby and Storeton is violated. <p>The above notes have specifically referred to the 26 land parcels that have been included on the green belt erosion bordering Core Strategy Settlement Areas 3 and 4. This should not be interpreted acquiescence with the remaining 22 sites within the 2018 Wirral Plan. Land grabbing of the nature encompassed in the proposed Local Plan will inescapably result in major costs for, disruption throughout, and management of improved services throughout the development clusters. Regeneration of Brownfield Sites offer major advantages for beneficial use of existing or adjacent basic services.</p> <p>2. Wirral Waters (Peel Group) .</p> <p>It seems inconceivable that in Wirral’s Strategic Housing Land Availability Assessment (SHLAA) major housing prospects identified for Wirral Waters should only result in 935 new houses within the proposed 2018 Local Plan. Core Strategy CS 12 declares a potential of 15,200 dwellings, with 7,340 being provided by 2028 (10 Years from now) and achieving over 50% of the Government’s 15 year target. In 2017, Wirral Waters was the only project designated as a Housing Zone and Enterprise Zone by Central Government.</p> <p>Wirral Council, in conjunction with the Liverpool City Regional Council should be energetically driving progress on this project and setting strict targets for delivery over the next 10 years.</p> <p>1. Brownfields First.</p> <p>There are 91 brownfield sites across Wirral where up to 9,000 new houses could be built; these include former schools, bars and churches. The sites identified across the borough where plots currently exist each with potential to build homes ranging from a few up to hundreds. Accordingly, additional brownfield sites identified are alongside the list of green belt sites that are proposed for development and total a space for up to 2,400 new homes. These are also in addition to the ‘thousands’ of others that have been granted planning permission but where building has not yet begun.</p> <p>2. Unoccupied Housing on Wirral</p> <p>Additionally it is estimated there are more than 6000 homes across Wirral that remain unoccupied; these homes should be a priority for refurbishment and re-occupation. This could be incentivised through local grants that stipulate that the property should be sold or rented after completion and within a certain time limit.</p> <p>In Summary</p> <p>It is totally unacceptable to even consider developing on the Wirral green belt sites knowing that enough housing can be found to meet the national government target through re-occupation of existing houses and regeneration of the brownfield sites that have already been identified, offering a total well in excess of the 12,000 homes required by 2035. Wirral residents will not tolerate local government negligence and incompetence resulting in the loss of our precious green belt facilities within the Wirral peninsula. We would like to preserve the special character of the Wirral. It is the duty of the local government to investigate and exhaust every possibility to reuse existing housing and assist in urban regeneration sites that have the local services already provisioned and will ensure we preserve our Wirral green belt for future generations.</p> <p>The proposed plans to build on our Wirral protected green belt will contravene the NPPF and lead to unrestricted sprawl of large built up areas and merging of neighbouring towns. This will be detrimental to Wirral and our goal to preserve, maintain and protect places of interest and historic towns. It is paramount that we pay attention to the NPPF cautionary message in Paragraph 135 “Once Lost-Lost Forever.”</p> <p>I would like all of these points to be addressed during the public consultation period and expect that common sense will prevail and local government will act in the interest of its Wirral constituents. I am writing with regards to the Core Strategy Local Plan which looks set to endanger our local Green Belt. In The National Planning Policy Framework and the 2015 Conservative Manifesto it is clearly stated that Ministers attach great importance to the Green Belt and will maintain existing levels of protection. In March 2015 the Prime Minister declared that protecting the Green Belt is 'paramount'. According to CPRE, Adam Smith Institute (ASI), Secom and London First have called for large-scale development on Green Belt land. ASI refer to these areas in a neoliberalist paper they released 'The Green Noose' (Papworth, 2014) citing the Green Belt as a restriction of free marketing for large scale development for housebuilders alongside the importance of privatisation on public health, education and taxation law. In fact, it is important to be aware that ASI formed the primary intellectual force behind privatisation of state-owned industries during the premiership of Margaret Thatcher. They reflect the growing influence private sector consultancies, and others acting on behalf of large developers, are having in debates over planning issues, a trend highlighted by Gavin Parker et al, 'In Planning We Trust?', Town and Country Planning, December 2014. The benefit of Green Belts are as vital as ever and by looking at other countries we can see that without the strong protection it offers against most forms of development, more valuable countryside would be consumed by urban sprawl and the 'special character' of Wirral would be irreversibly eroded. We need to find and regenerate previously developed or 'brownfield' land in urban areas such as already cited the former Seaman's Mission at Gibson House, Liscard, the former Foxfield School site in</p>

DOR REF	RESPONSE
	<p>Moreton, Former Old Tavern Club in New Brighton and the brownfield sites on Dock Road North and the former Acre Lane Resource Centre in Bromborough. The Government has lied to the people in saying that the protection of Green Belt is 'paramount', if they are issuing Wirral with a target of 12,000 houses, knowing full well Wirral does not have the brownfield land available, reflecting the growing influence of the neoliberals and private sector consultancies with their clever arguments and think-tanks that will inevitably line their pockets and take freedoms, such as accessible countryside for all classes, away forever.</p> <p>International comparisons (United Nations Human Settlement Programme (UN Habitat), Planning Sustainable Cities: Global Report on Human Settlements October 2009. (Summary available from www.unhabitat.org) suggest that with the increasing global pressures from climate change and population growth, our farmland and woodland will become more valuable in future, not less. The calls for more development in the Green Belt assume that this land is more valuable if built on, an assumption that is fundamentally flawed - 'economic growth' is not in itself an exceptional case. The Green Belt is needed now more than ever. If we loosen our Green Belt controls or de-designate large areas of it, we would simply allow more land to be built on where developers can make maximum profit, as has been the experience of other countries in Europe, particularly Spain and Ireland (Irish Times, 2006, 'Dublin is cited as worst-case scenario of sprawl.') CPRE discovered and demonstrated in the 'Housing Capacity on Suitable Brownfield Land', 2016, that brownfield land is not a finite resource - it is constantly being replenished. This CPRE analysis of new 'brownfield registers', produced by 53 authorities in October 2016 found that 11% more housing could be provided on brownfield sites in those areas compared to 2014. Government land use change statistics (DCLG, Land Use Change Statistics, Live Table 223) show that, in every year since 2004, we have consistently built on average 50% more houses on brownfield sites than on equivocal areas of greenfield. We must surely re-examine this brownfield land before even considering going into our Green Belt. The environmental value of individual parcels of Green Belt is not the prime concern but together these parcels of greenfield provide accessible countryside close to town and city dwellers.</p> <p>A huge proportion of it has considerable environmental value. In the face of climate change, it has an increasingly important role in storing carbon and preventing flooding and it is a vital economic resource for food and soil protection. The NEA (National Ecosystem Assessment, 2011) recognises the huge value of agricultural land to society, both in terms of food and in 'cultural services' (such as the sense of wellbeing produced by seeing an agricultural landscape). The NEA notes that biodiversity and some landscape features (particularly hedgerows) have declined in many agricultural landscapes but emphasis that this trend has begun to reverse through better land management (NEA, Synthesis of the Key Findings. UNEP-WCMC, June 2011, pages 18, 23 and 25). To propose even just building on a small percentage of Green Belt Land sounds an attractive way of releasing land for housing, but once bits of the Green Belt are removed, the integrity is reduced and so it's benefits are lost. Permanence has been an important feature of Green Belt so people, businesses and the Government (through supporting environmentally sensitive farming on Green Belt land) have the confidence to invest in the area on that basis. Once a small piece of land is released, the temptation to sell more and more land to developer's increases and the urban sprawl will forever change the beautiful nature reserves of Wirral to concrete. I implore you to re-examine the brownfield land and protect our beautiful countryside and large areas of open space, which you yourself refer to as 'the special character of Wirral'(Core Strategy Local Plan - Review of Development Options, 23 July 2018), and to which many Wirral town-dwellers, our Liverpoolian neighbours and local Ramblers, Scouts, Guides, Duke of Edinburgh Award Scheme participants and local schools visit for clean, healthy air, and walks amongst the natural wildlife reserves of plants, birds and animals with no restrictions on grounds of class or income .</p> <p>I trust that you will consider these fundamental arguments and seek a solution that will not remove our Green Belt land because once it has been compromised and destroyed, it will be gone forever, in which case both our own and the generations after us will count the cost.</p>
DOR00745	<p>I have attended the public consultation meeting at Pensby High School and have read the numerous documents on your website and still fail to understand why site SP019B is even under consideration for the reasons I state below:</p> <p>1) It is agricultural land.</p> <p>In the 4 years that I have lived in Parkway we have seen wheat, oil seed rape and beans being grown. By building on this land you will be reducing the land the local farmer is able to produce crops from and thus affect his/her livelihood. I understood that farmland would NOT be built on so why SP019B is even being considered, I do not know!</p> <p>2) It is an area of biodiversity.</p> <p>There are ponds on the land containing protected species that we have been told of. Particularly of note are the bats that live in the tree at the bottom of our neighbour's garden. We see them flying around at dusk and the fields are their feeding area. What will happen to them and I understood bats were meant to be protected? There are many birds in the area including buzzards, owls and geese that also use the area as a feeding ground. There is a risk to the migratory birds as a whole.</p> <p>3) Any housing would destroy our landscape.</p> <p>In keeping with the general houses available in Irby then I assume any development would incorporate family housing and yet, if any housing is required in Wirral then it would be affordable housing for those not yet on the property ladder. Cheap housing would not be in keeping with the area.</p> <p>From information I have learnt from recent meetings there are currently 4650 empty homes on the Wirral and Peel will be building 6415 homes so, actually there are only a few homes needed to meet the Government target. So I don't even know why building on so called 'protected' Greenbelt' is even being considered. Personally I find the whole consultation and proposals very distressing and hope that the council can 'come to its senses'.</p> <p>I trust that the above points will be taken into consideration before making your final decision. I dread to think how much value in my house would be lost by any development.</p>

DOR REF	RESPONSE
DOR00746	<p>I write with very grave concerns regarding the development and building on Wirral's greenbelt Land.</p> <p>The main purpose of the Greenbelt Policy is to protect designated land around large urban centres from urban sprawl as well maintaining the areas of forestry and agriculture, also providing a habitat for wildlife. It stops increased car use, also stops the neglect of brown land sights and dilapidated buildings. Greenbelt also includes significant local biodiversity - the variety of plants and animal life which is considered to be of great importance. It also protects heritage sites. Its trees, plants and open spaces soak up our carbon emissions as well as providing recreational space.</p> <p>Without greenbelt land our villages and towns would merge thus losing all identity.</p> <p>Two thirds of our greenbelt is agricultural land and is being depleted at an alarming rate. We are losing almost 7 dairy farms per week in England and Wales. This must stop. We only produce two thirds of our food in the UK and with leaving the EU we should be more efficient.</p> <p>There are Owls (Barn, little and Tawny). Common and Harvest Mice and Shrews. There is also an abundance of Sparrows, Robins, Wrens, Tits, great flocks of Starlings, Chaffinch, Greenfinch, Rooks, Crows, Magpies, Cuckoos, Pheasants, and Herons. Berwick's swans and little egret seem to use the land as a resting place. There are birds of prey including kestrels, Sparrow hawks. Swallows and House Martins come in their droves every spring from wintering in South Africa to their nests on the farm to breed and feed. Other wildlife present on the farm includes Frogs, Toads, Newts and Foxes. At dusk there is an abundance of Bats.</p> <p>We have heard enough statistics to know there is enough brown belt land and empty property to meet with the Government's requirement of houses to be built. I have been online under the Freedom of Information Act to find out about the Government asking the Leverhulme estates to release Green Belt Land. It Says 'Government Leverhulme Missing'. In the Greasby area alone, 534 new homes are proposed at Greasby Copse and a further 147 proposed between Mill Lane and Hillbark. A total of 681 houses are proposed. We do not have the infrastructure, schools or healthcare facilities to support this number of housing. What we have already is inadequate.</p> <p>Much has been made of the new Signs into Greasby "Gravesberie, Greasby One of the Earliest Settlements in Britain 8500BC" Rich in Heritage and Artefacts. One that is proposed to be built on, even ring fencing the Copse trees will do nothing to save this precious site.</p> <p>A person who spoke at the meeting at the Greasby Community Centre on 1st September works with people who are homeless and have poor housing in Birkenhead, they said the type of houses they are proposing to build on greenbelt will be far too expensive for the people who need them. The Council needs to build affordable homes in Birkenhead and improve the area and facilities. These will be executive homes on prime land, commanding a high price. Of course developers will be queuing up to get in on the act.</p> <p>At that meeting all 4 Political Parties, Labour Conservative, Liberal Democrats, and Green Party, were of one voice. Also everyone at the meeting on a show of hands said a resounding NO to any use of Green Belt Land on the Wirral.</p>
DOR00747	<p>Plan Period - Whilst the HBF would normally support the use of a 15 year plan period, given the time it has taken the Council to prepare this plan and the dated nature of the UDP upon its adoption, the HBF would encourage the Council to consider a longer plan period.</p> <p>Housing Requirement</p> <p>The Development Options consultation suggests that the Council are intending to utilise the OAN produced by the Standard Methodology. The FAQs Paper states that this calculation currently shows an overall minimum need for new housing of 12,045 new dwellings over 15 years, equal to 803 dwellings per year (net of demolitions and other losses). The HBF notes that the MHCLG figure is applicable for ten years but the Council has extrapolated this over the plan period. The FAQs Paper goes on to state that this is broadly consistent with the Council's earlier findings and a more recent assessment undertaken at Liverpool City Region Level. The paper also highlights that it does not allow for economic growth.</p> <p>Housing Supply</p> <p>The Briefing Session Presentation identifies 2,634 dwellings with planning permission as of April 2018, 90 proposed housing allocations with a capacity for 2,403 dwellings, and 997 homes proposed at Wirral Waters Northbank. This differs slightly from the figures reported to Cabinet which identified 2,572 dwellings with planning permission, potential sites with capacity for 4,026 dwellings, 1,100 dwellings at Wirral Waters, 750 dwellings from conversions and 900 dwellings from windfall. The HBF recommend that the Council ensure that they have a good source of evidence for their supply and that it is used consistently. Within the Briefing Session Presentation, the Council identify a shortfall of 4,990 dwellings, plus a 20% buffer for under delivery giving a shortfall of land for 7,390 dwellings. Within the Cabinet Report a shortfall of 4,794 dwellings is identified, again it would be useful to have consistency in the figures.</p> <p>Extant planning permissions</p> <p>The identification of sites with extant permission is noted, however, the HBF would seek assurance from the Council in relation to their consideration of the likely delivery of these sites. The Council will be aware that sites may not be developed for a wide range of reasons, this often leads to a lapse rate in planning permissions. A lapse rate is commonly applied to the supply in the examination of local plans. Ideally the scale of any lapse rate should be determined locally. In the absence of local information, a common approach, which has been accepted at a number of planning appeals, is to provide a 10% deduction in unimplemented housing permissions. It is recommended that this issue be given further consideration.</p> <p>Windfall and Conversion Allowance</p> <p>The HBF recommends that if the Council intends to include an allowance for conversions and windfalls that they have an appropriate evidence base to support this. The HBF also considers that historic trends may not always be an accurate reflection, as we would expect the delivery of homes from these sources will reduce over future years as sites allocated in the Local Plan are brought</p>

DOR REF	RESPONSE
	<p>forward. The HBF would recommend that these allowances are not included in the supply and instead form part of the flexibility in supply. However, if an allowance is to be included within the supply the HBF would suggest that the allowance is not included within the first three years of the Plan to avoid double counting.</p> <p>The HBF also strongly recommends that the plan allocates more sites than required to meet the housing requirement; as a buffer. This buffer should be sufficient to deal with any under-delivery which is likely to occur from some sites. Such an approach would be consistent with the NPPF requirements for the plan to be positively prepared and flexible. The HBF recommends as large a contingency as possible (circa at least 20%) to the overall housing land supply to provide sufficient flexibility for unforeseen circumstances and in acknowledgement that the housing requirement is a minimum not a maximum figure.</p> <p>The HBF does not wish to comment upon the acceptability or otherwise of individual sites. It is, however, important that all the sites contained within the plan are deliverable over the plan period and planned to an appropriate strategy. The HBF would expect the spatial distribution of sites to follow a logical hierarchy, provide an appropriate development pattern and support sustainable development within all market areas.</p> <p>The Council's assumptions on sites in relation to delivery and capacity should be realistic based on evidence supported by the parties responsible for housing delivery and sense checked by the Council based on local knowledge and historical empirical data.</p> <p>Green Belt Review</p> <p>The NPPF (2018), paragraphs 136 and 137, provides the mechanism for releasing Green Belt through the Local Plan process and requires local authorities to demonstrate exceptional circumstances. The Council will need to ensure that these exceptional circumstances are fully explored in their Local Plan. Providing that the authority is able to demonstrate that it has fully examined all other reasonable options, the need to meet the housing needs of an area has been accepted to meet exceptional circumstances in other Local Plan examinations.</p> <p>The HBF generally agrees that the requirement to allocate sufficient land for the development of market and affordable housing to meet the identified needs are likely to constitute exceptional circumstances that justify the alteration of Green Belt boundaries through the preparation of the Local Plan. Indeed, it is noted that without such releases the amount of new development that could be significantly below identified needs, this would lead to significant reliance upon neighbouring authorities agreeing to take any unmet needs.</p> <p>Safeguarded Land</p> <p>Whilst there is no definitive guidance indicating the amount of land which should be safeguarded the NPPF (2018) is clear that where necessary Local Plans should 'identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period', and that local authorities should 'be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period'. Given that the proposed plan will have a 15-year time horizon it is considered that safeguarded land requirement should seek to match this. This will not only provide a robust long-term Green Belt boundary but will also provide certainty for residents and developers alike in terms of likely growth locations beyond the end of the plan period.</p> <p>The HBF would also anticipate the plan should provide triggers which would indicate when the safeguarded land would be considered for release, through a plan review. The Council will be aware of the housing delivery test, this will require an action plan to be taken if delivery falls below 95% of the Council's annual housing requirement. The release of safeguarded land could be linked to a trigger if the plan is failing to deliver as anticipated.</p>
DOR00748	<p>Please do not build on any of the existing 45% of beautiful green belt we have left.</p> <ul style="list-style-type: none"> * Instead redevelop the Birkenhead dock area. *Use existing empty houses. *Utilise existing vacant brown sites. *Do not apply the standard UK formula to our lovely Peninsular. <p>Just say NO!</p>
DOR00749	<p>I would like to register my objection to Wirral's Local Plan. I am not averse to the building of affordable housing where needed. However it's apparent that the local population of Wirral is declining so any targets showing the need to build houses are unsubstantiated. There are many neglected areas on the Wirral where communities are in decline with many empty properties. The Council's time would be best spent utilising these properties to provide affordable houses, where needed. The areas of Green Belt are isolated and any access to facilities limited. Therefore the costs of inputting any infrastructure will be prohibitive. The added pressure on local schools, doctors and public services will be immense as they are already underfunded and have no spare capacity. The only people likely to benefit from this so called pretence of providing affordable housing are the developers/ builders. I strongly urge you to reconsider this unworkable proposal that will change the Wirral beyond recognition for future generations.</p>

DOR REF	RESPONSE
DOR00750	<p>I am writing in response to the letter sent to us regarding the potential to build on land close to Oxford Drive, Thornton Hough, which we strongly oppose.</p> <p>The estate is surrounded on three sides by agriculture land and the B5136 on the fourth side and to build on this area would greatly impact agricultural land and effect the openness of the green belt. In the summary of Initial Green Belt Review it is stated that "The area is part of the Thornton Hough Rural Farmland Landscape character area where the quality and condition of the landscape is good and the landscape strategy for the character area is "conserve". This character area is sensitive to any changes which would reduce the local distinctiveness of villages or increase the prominence of roads or urban edges." It is therefore not suitable for release from green belt, or to be built on.</p> <p>It is imperative that the unique character of Thornton Hough is retained for all to enjoy. It is clear now that the dwelling requirements in Wirral for the next 15 years should be downgraded due to the recent figures released by the Office of National Statistics and in light of this new information can the Council give an undertaking that green belt boundaries will not be redrawn. We have been informed that the development at Wirral Waters, along with Brownfield site availability and the 4000-6000 empty units that exist that could be brought back into habitable use will more than suffice the requirement of 7320 units over the 15 year period.</p>
DOR00751	[SAME AS DOR00768]
DOR00752	<p>I wish to voice my opposition to the release of green belt in west Wirral, specifically "Strategic Parcel 062" I am concerned about a number of factors these are:</p> <p>Increased traffic:- Downham Road North is narrow. Traffic struggles to flow now with the current population and volume of traffic and rush hour at Barnston dip and the junction of Storton lane is terrible. Both narrow lanes, not capable of handling so much traffic. There is limited alternatives to commuters using their cars. We have a train station that goes no-where, well Bidston - Wrexham, and two bus services to Liverpool, taking 45mins to get there.</p> <p>Local services: - Unless you are wealthy and enjoy restaurants, there is not much in Heswall with regards leisure facilities. Our nearest leisure centre is West Kirby unless you want to play 5 a side which in that case you can go to Pensby School. Our only Leisure asset is the beautiful countryside and green belt for which we can walk, but this is being taken away due to green belt development of Strategic parcel 062. My family and I enjoy walking across the fields from the side of Heswall primary school over to Barnston Church and the fox and hounds (less dog poo than the streets of Downham Road North) Schools and Dr's, already stretched takes 3 or more days to get a Dr's appointment and that's if you are lucky to get one.</p> <p>I also object to the seemingly easy option of using virgin greenbelt to build houses on rather than utilizing existing brown belt sites. Heswall and the Wirral is a Beautiful place to live, building on these greenbelt sites is going to turn us into just another urban sprawl with no identity or a place to be proud to live and come from. It will be a mistake to agree to release this land for building. We advertise ourselves as a Beautiful place to visit and live, but are destroying the very thing that attracts people to live here.</p>
DOR00753	<p>1. The proposed new houses to be built on productive farmland around Lever Causeway and the surrounding area are not needed as at the moment there are 5000 empty homes on Wirral which could and should be brought back into use. There is also sufficient land in urban areas to build on to meet the modest requirement for new homes over the coming decades. Added to which there is a plan for Peel Holdings to build up to 13000 new homes at the Wirral Waters scheme.</p> <p>This is mainly on brown field sites.....I have seen part of the letter sent to the leader of Wirral Council in which the top man from Peel Holdings says " Given the way you have conducted yourself in recent months, and the very misleading public statements you have made, we ask that you stop this campaign of misinformation; be honest with the people of Wirral and correct the misleading information you are distributing." This is an appalling thing to happen.</p> <p>One wonders what the council is up to? Do they want Peel Holdings to withdraw so that some of the most beautiful and productive countryside in Wirral can become just another urban sprawl?</p> <p>2. If these houses were built around Lever Causeway they probably would be large four bed-roomed properties with double garages, as these makes the builder more profit!</p> <p>Please note the Glenavon site. I believe that planning permission was given for affordable housing. I now understand that the builders have re-applied/been given permission to build 4 bed-roomed houses with double garages!</p> <p>3. There would be increased traffic and major congestion around the area.</p> <p>4. If the houses were built, where would the extra shops, schools etc be? Local Schools are already bursting at the seams!</p> <p>5. Where would all these people come from?</p> <p>6. Storeton is a small historic settlement which will be directly affected by any building on Lever Causeway. If this went ahead there could be unrestricted sprawl merging it with Bebington!</p> <p>7. As we are the Wirral Peninsula, surrounded on three sides by water, our green belt is even more precious as there is nowhere else to go!</p>
DOR00754	[Local Plan enquiry - Not a response]

DOR REF	RESPONSE
DOR00755	<p>I oppose the planned release of green belt land at Storeton and levers causeway for building development. I oppose this for several reasons</p> <ol style="list-style-type: none"> 1. There are numerous areas of brown field sites that are ideal for building development including derelict/abandoned buildings across the Wirral. 2. We should protect our beautiful countryside that provides local residents and visitors with numerous forms of recreation. 3. The picturesque views across to Wales need to be preserved and not irreversibly ruined by any sort of building development. 4. Where do you suppose any children who will live in these new houses will be educated as local schools are already majorly oversubscribed? 5. Where will the residents of these new houses receive healthcare as our local hospital and community trusts are overstretched? 6. The projected figures of homes required are not applicable to this area of the country. 7. Our local farmland should be protected especially with Brexit not yet finalised we need our horticulture. 8. Storeton is a historical hamlet and we should protect our local history. 9. The conservation land in this area needs protecting. <p>Please don't irreversibly destroy our beautiful local greenbelt land</p>
DOR00756	<p>At this point all I'll say is - we will fight this all the way; from an unlawful point of view; a mental health point of view; a wildlife point of view; a questionable financial agreement point of view; a totally unnecessary point of viewIf there are people putting money before clear, honest community based thinking connected to this incredulous process - shame on you & step aside. Your embarrassing & improper practices will be shared & stopped. Feel free to discuss your irrational thoughts with someone who cares & someone who has the sense to seek alternative solutions - me and thousands of other fed up Wirral residents.</p> <p>Meaning of CONSERVATION :</p> <ul style="list-style-type: none"> * the protection of plants / animals / natural areas - from the damaging effects of human activity * the prevention of loss * to preserve and protect * to save the environment <p>Why would anyone UNNECESSARILY choose to go against this ?!</p> <p>In Upton, we've already had large numbers of houses built within 'Upton Pines' and along Manor Drive. A fire station is being built on greenbelt land. Enough !!</p> <p>What relatively small greenbelt is left within this locality is precious to all. A 'small field' may not mean much to certain councillor's; but to the local resident's it can make a significant difference to their quality of life.</p> <p>We all know there are enough sites - brownfield & non conservational to meet demands. Please ease our mental stress in relation to these matters & concentrate on them.</p>
DOR00757	<p>I am firmly convinced that there is no need to build on Green Belt land in the Wirral. Sajid Javid the then Secretary of State's letter of 20. 3. 2018 re the Local Plan included the sentence "This is not an area of high housing pressure." The Original Green Belt was "tightly drawn to support regeneration." There remains an enormous amount of regeneration still needed in the older housing areas and at Wirral Waters. The Council has only allowed for 1100 dwellings at Wirral Waters before 2035, whereas the plan is to build almost all of these in the next 3 years and a many as 6,450 by 2035, which would significantly exceed the Council's stated shortfall of 4,990 without encroaching on Green Belt. For the rest of the complicated calculations and criteria based on Council calculations which I believe used faulty Government statistics I would refer you to the Heswall Society's response to the Local Plan, early drafts of which were welcomed by all of us at the meeting. The National Guidance NPPF2 revised and reissued in July states "Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. In our view the Council's Review does not meet this or other requirements in NPPF2 I would commend the Council's active programme to bring back into use empty properties and believe that this success can be repeated thus reducing the shortfall further. I would also like to commend the Council for sparing the land lying between the Wirral Way/Davenport road and the Dee estuary. Any infill between the estuary and the Wirral Way along its whole length would be detrimental to wildlife and to the enjoyment of the hundreds who use this every day.</p>
DOR00758	<p>I wish to oppose potential plans to build on Green Belt sites throughout Wirral. I understand that all Green Belt sites will have their Green Belt status removed which opens the way to potential development. I believe this would ultimately change and have a negative impact on the coastlines, countryside and open spaces that give Wirral its unique character. Specifically I would also like to oppose the proposed Green Belt site reference SP039 (South of Peter Prices Lane, Bebington). Firstly the description is inaccurate as it is also South of Stanton Road which is not mentioned on the proposal. Poulton Recreation Ground on Stanton Road and any development on this site would have a huge impact on my family specifically for my young children and also for the wider community. We moved here specifically for this beautiful green space which we and the wider community use regularly. The Recreation Ground is used by children for playing and sports, cycling, fishing, running and many other uses. It is also used daily by the community to walk their dogs. It is such a valuable open green space that everyone can use for free. I feel that this is very important especially because of the new parking charges in Wirral Country parks. I appreciate the opportunity to comment on these proposals and hope that the Council realises the importance of these green spaces for the environment and the health and wellbeing of Wirral residents and allows it's beautiful landscape to remain as it is.</p>

DOR REF	RESPONSE
DOR00759	<p>Local population growth figures do not substantiate the housing targets identified by the Council/DCLG Number of empty houses Planning applications that may be ‘stuck in the system’ Lack of central Government funding for infrastructure Isolated nature of Green Field sites and access to facilities, regular public transport, shops etc.</p> <p>Loss of biodiversity and public amenities e.g. access to natural habitats, woodland, footpaths, bridle ways etc. Impact on core services such as health services, schools</p> <p>Lack of employment opportunities for new neighbourhoods The estate is a small, mature development which is surrounded on 3 sides by agricultural land and by the B5136 on the fourth side</p> <p>Extending the estate would have an impact on areas of agricultural land and have a detrimental effect on the openness of the green belt</p> <p>In the summary of Initial Green Belt review it is stated that “the area is part of the Thornton Hough Rural Farmland Landscape Character Area where the quality and condition of the landscape is good and the landscape strategy for the character area is “conserve.” The character area is sensitive to any changes which would reduce the local distinctiveness of villages or increase the prominence of roads or urban edges.” It is therefore not suitable for release from the green belt, or to be built on.</p> <p>It is imperative that the character of Thornton Hough is retained.</p> <p>It is clear now that the dwelling requirements on Wirral for the next 15 years should be downgraded due to the recent figures released by the Office of National Statistics and in light of this new information the council should give an undertaking that green belt boundaries will not be redrawn.</p> <p>The development at Wirral Waters, along with Brownfield site availability and the 4000-6000 empty units that exist that could be brought back into habitable use will more than suffice the requirement of 7320 units over the 15 year period.</p>
DOR00760	<p>Any alteration to the existing Green Belt boundaries need to be shown to be exceptional and fully justified. I question whether the council process has satisfied this primary criteria. The principal premise for including the Green Belt in the review at all is based on forecasts which are overstated and do not appear to be correct.</p> <p>The council’s first obligation is to focus on recycling derelict and unused urban land which I am unconvinced has been undertaken thoroughly.</p> <p>The conflicting messages from the council and Peel Holdings needs to be clarified. If Peel Holdings are right then this whole exercise can be accommodated within their development proposals.</p> <p>Specific land ref SP013</p> <p>The land is very fertile agricultural land and is used as such. The land is surrounded by a conservation area. The traffic impact onto Column road would be significant.</p> <p>Any large housing development would be detrimental to the area’s unique character. I am very cynical that the only reason this land is being considered at all is due to the location, as it would enable developers to build large detached dwellings - being the more profitable.</p>
DOR00761	<p>I would like to register my concern regarding the potential boundary changes to Wirral Green Belt being investigated by WBC. I do live in Thornton Hough, and I worry that the term green belt may well become a term of the past if it stands for nothing and means that green belt land is not safe from development.</p>
DOR00762	<p>This land is green belt, and is within the coastal area and Wirral Way, having many species of birds nesting here, and other wildlife visiting these fields. We also have several badger sets that have been here for many years, and habitat for the bats that fly around in the evenings.</p> <p>In the last year we have had over 30 new properties, including apartments, built in the lower village area, and the infrastructure for many more is not in place, including schools, roads, drains, medical facilities etc. There are also several properties in the area that have been on the market for a very long while, and are still unsold, so therefore there is no requirement for additional housing.</p> <p>This is high quality agricultural land and needs preserving as such.</p>
DOR00763	<p>I’m very concerned about the plan’s intention to develop greenbelt land. The environmental impact of this decision would be severe. Surely a better approach is for brownfield development, greater densities, and a shift in taxation policy to encourage empty properties to be put to good use. Furthermore, the increased traffic caused by development, the lack of public transport, the non-electrified train line on West Wirral track are further reasons why development on greenbelt is not appropriate.</p>
DOR00764	<p>I write to register my objection to the proposal to release GREEN BELT LAND in the area of the Lever Causeway in Bebington for building.</p> <p>I have lived in Higher Bebington for over 40 years, and on the Wirral for over 60 years.</p> <p>Any development on this Green Belt Land will have a substantial impact on the character of the area.</p> <p>Numerous local residents frequent the area for relaxation and exercise purposes.</p> <p>Acres of land would be lost for agriculture.</p> <p>Traffic congestion in the area of Lever Causeway and the villages of Storeton and Barnston</p>
DOR00765	<p>Given open space may feature in some of the land that could be allocated we would ask whether other open space typologies be also considered for an allocated future use. Existing communities may enjoy using spaces as such and any future allocations could give rise to objections. The implementation of the council’s 2016 Playing Pitch Strategy, including any lapsed and disused sites, should also be considered alongside this. Existing communities as well as the new residents of any housing allocation will also have needs for open space and recreation facilities and compliant with para 96 of the NPPF allocating land for this purpose also needs consideration.</p>

DOR REF	RESPONSE
DOR00766	Building on this land would increase pollution and defeat the whole purpose of green belt land. Local schools and medical resources do not have the capabilities to function with such an influx. Why not use the land in other local urban areas to build on there? There is sufficient land there already. Population projections don't justify 12,000 houses! Lever Causeway is an open space that provides an area of relaxation and exercise for many, many local residents. The visual impact would be devastating to the remaining green belt. Where would the building end? Urban sprawl is not what is needed. Regeneration of other local areas would be much more welcome. Traffic congestion is already an issue at peak times. The Mountwood Conservation Area would suffer massive devastation of its Green Belt. Take time to reconsider alternative options.
DOR00767	These representations relate to the land to the rear of Pensby Children's Centre, off Fishers Lane, Pensby which is subject to a current planning application submitted on behalf of One Vision Housing. The Site benefits from being an allocated site in Development Option Review Consultation and we fully support the Council's allocation of the site as a future residential site within the urban area. It is clear that Wirral is an Authority very much restricted in respect of housing land due to large areas of Green Belt designations across the Borough. The development of the Site subject of these representations (a sustainably located, redundant former playing field which is surplus to requirements) will provide much needed affordable bungalows on a sustainable site. The Council's own evidence base for the emerging Local Plan considers the Site to be a suitable, available and deliverable residential Site. Indeed, the Site is included in the Council's current 5 year housing land supply and provides an opportunity to meet the Borough's housing needs.
DOR00768	Green belt land should remain as: a) to check the unrestricted sprawl of large build-up areas b) to prevent neighbouring towns merging into one another c) to assist in safeguarding the countryside from encroachment d) to preserve the setting and special character of historic towns e) to assist in urban regeneration, but encouraging the recycling of derelict and other urban land There is an error in your Summary of Initial Green Belt Assessment September 2018. On page 52 the agricultural land use for SP030 has been classed as pasture and horse grazing. In fact, the land under SHLAA1819 on site SP030 is actually used for farming arable, and has been for many, many years. Recent soil reports show the site as containing very good quality soil. SHLAA1819 has already had a crop harvested this year and is currently growing winter wheat. The land further down Lever Causeway between Marsh Hey Covert and Little Storeton Village is also being farmed. Therefore a very large proportion of SP030 is actually used for arable farming and not horse grazing as indicated. At a Council Meeting on 15 October, Motion 3 was voted on and carried unanimously. The first paragraph of this motion reads, "This Council requests that renewed importance should be attached to the protection afforded to agricultural land as the responses to the Local Plan are considered. Land that is currently in productive agricultural use should not be removed from the Green Belt in view of the need to safeguard future food supplies." Also, as this parcel of land abuts Marsh Hey Covert, and covers an area between Marsh Hey Covert and a copse behind Stanley Avenue, the notes should also include that the area may include supporting habitat, as there is evidence of badger activity, owls and bats in this area. The areas also give protection to other local wildlife whose natural habitat will be eroded by any development.
DOR00769	I wish to express my objection to the proposed plans to reduce yet again our precious green belt.
DOR00770	I strongly disagree that there is any need for Wirral Council to consider the redesignation of Any green belt land for development purposes, specifically Strategic Parcel 062, as the analysis paper attached clearly concludes, there is absolutely no case for building on greenbelt Strategic Parcel 062. [SAME AS DOR01052]
DOR00771	We strongly disagree with any proposed building on any green belt on the Wirral and especially the areas SP099, SP100, SP101, SP102< SP103 and finally SP 104 as these have been listed with a potential option for infill village development of up to 117 new homes. This represents an increase of around 75% over all the properties on Davenport Road, Park West, Manners Lane, Seabank Road, Riverbank Road and Close put together. This would put a huge strain on the infrastructure of the area, as there are only two ways out to the Lower Village (existing Heritage Site) via Wittering Lane (dirt track) and Station Road which already has too much traffic, and at the top there is a blind corner where it meets the Village Road which is an extremely dangerous junction. It would not be able to cope with the extra hundreds of cars, bin wagons, delivery vehicles etc. The Wirral Way finishes at Wittering Lane and then goes the full length of Davenport Road and then continues at the top of Riverbank. On all days of the week Davenport Road is extremely busy with people on horseback that use the Wirral Way bridle path, parents with young children on bicycles, and many dog walkers. If there were built say 117 houses with all the extra traffic that it would incur it would become very dangerous for all concerned. We have a major issue with drains which struggle to cope now even though millions have been spent over the years. The smell at the bottom of Seabank Road in summer is disgusting as the Sewers struggle to cope. Consideration has to be given to the protection of all the wild life on the Dee Estuary which is an SSI/RAMSAR Site. Within and around the areas specifically affected by land parcels SP099, SP100, SP101, SP102, SP103 and SP104 there exists off site roosting, breeding and feeding of a range of wet and sea birds. In terms of wildlife corridors they are essential for the preservation of protected species such as Badgers, (that live in the banks along Davenport Road), birds of prey, voles, foxes, hedgehogs, curlews and shell ducks amongst others. It is our understanding that these affordable houses need to be built in areas of employment not in the countryside near to a preservation area so how can this be considered? If the houses were to be built where would the children go to School? I We only have two local Primary Schools St Peters and Gayton Primary School both on the same road either side of Lower Heswall (Heritage Centre) and trying to get past these two schools at drop off and pick up times at the moment is near enough impossible especially when delivery vans and wagons are Trying to get past so any increase in

DOR REF	RESPONSE
	<p>traffic would cause grid lock at these times coupled with the added danger. Surely before releasing precious Green Belt and coastal zone land it would be reasonable to ask Wirral Council to review all other potential options and ensure that these have been Fully exhausted. For example, complete assessment of existing brownfield sites, complete assessment of existing vacant housing stock, detailed reviews of potential urban areas closest to Employment, re-generation of run down areas, review of options with other developers such as re-visiting what the Wirral waters proposal has to offer by working closely with Peel Holdings which might then encourage other parties to participate in the regeneration of other areas of the Wirral, where it is needed.</p>
DOR00772	<p>I hereby wish to lodge my objections to the above. (SP052)</p> <p>The proposals have implications for traffic congestion in Eastham Village, added traffic air pollution on the A41 if the trees are cut down, and the destruction of the very nature of Eastham Village, which was mentioned in the Domesday Book.</p> <p>It would be preferable, firstly, if the number of houses required were accurately identified and then brown field sites identified.</p> <p>If all the areas identified in Eastham were built on, have the implications of education and medical needs of the population been considered, i.e. would a new school be needed.</p>
DOR00773	<p>We object to the above referenced land being developed for dwelling houses in the future. At this time we understand that no such application has been submitted so our objections may be subject to change in light of such plans but the principles raised in this letter are likely to remain.</p> <ol style="list-style-type: none"> 1. Any development would have a negative impact upon the local natural environment. In particular wildlife including badgers, bats, foxes and birds. In addition the areas general biodiversity. 2. Light pollution would be increased with the likelihood of additional lighting being installed in the area. At present there are no street lights extending beyond 77 Pipers Lane. This would also have a negative impact on wildlife. 3. Any development would increase the traffic volume along Pipers lane resulting in congestion and access issues. The lane has many narrow parts which only allow single lane traffic and could not be widened. In addition the majority of the length of the lane has no pavement. As stated there is no street lighting beyond No77 nor is the Lane wide enough to accommodate lamp posts. Furthermore there are potential dangers to pedestrians who currently must walk in the road due to the lack of pavement s. The lane is an access point to the Wirral Way and is frequently used by walkers for this purpose. 4. The quality of the road surface is poor. Pot and sink holes frequently appear which require maintenance. This issue would be exacerbated if traffic flow increased. 5. There would be an increase in noise levels in the area impacting negatively on wildlife and residents. 6. The property density regarding any new builds would most likely be inconsistent with the current situation in which the vast majority of properties along the Lane are detached with substantial gardens. This would alter the street scene and character of the area in a negative way. 7. In relation to the rear gardens shown on SPOSSB which includes ours, we also object to any such building in this area for the reasons stated above.
DOR00774	<p>I am upset that being a house owner, I have only just heard that you are planning to build many houses , buildings on green belt land , which is not needed around here, save the community and stop this happening , think about the planet and the wildlife we will lose , the birds I feed , the hedgehogs that visit my garden , the foxes that have been pushed to live around here to survive and are happy in their surroundings , please think and build on land with rundown buildings already on and not dig up green land.</p>
DOR00775	<p>I have been concerned and shocked by the proposals to build on green belt land in key areas of Wirral. Wirral is a small area, hemmed in by the estuaries, major motorways and large conurbations which meld into one another. The existing green areas are vital as they provide breathing space for residents and visitors. The green spaces are crucial for the huge range of wildlife and protected species that live beside us on Wirral. We should be protecting these spaces and areas, not planning to build on them. Such a move is irreversible and would change the face of Wirral forever. Quality of life, improving mental health, enabling residents to exercise and enjoy natural green spaces are all vital. More vital than the erection of concrete and mortar. There are lots of brown site areas across Wirral which should be improved and enhanced before these precious 'air pockets' are concreted over.</p> <p>Plan well, serve us better, think about nature and wildlife and our wellbeing.</p> <p>Make Wirral a place we can be proud of, a place that other boroughs want to copy, lead the way. Do the right thing.</p>
DOR00776	<p>Please register my objection to the proposed use of Greenbelt land to meet Wirral's future housing needs.</p> <p>Firstly I dispute the amount of housing it is suggested Wirral needs to build - indeed I can only see our housing needs reducing unless we can attract more employment opportunities. In addition there are many brown field sites that should be used prior to Greenbelt including those held by private firms who are holding on to parcels of brown field sites which are an eyesore to our beautiful region.</p> <p>Secondly In my area of Saughall Massie we have already had a fire station built on a parcel of Greenbelt. The proposed development may also lead to the loss of our village conservation status as well as merging our area into Moreton losing our village feel.</p> <p>Thirdly, additional housing would mean additional traffic in an area that already becomes very congested& prone to accidents at peak times.</p> <p>Please re-consider the plans you have made. I would ask you to make strong representations to central government amount the amount of housing it is suggested Wirral needs.</p>

DOR REF	RESPONSE
DOR00777	<p>I would like to raise my objections to the potential building on Lever Causeway Green Belt land (SP030). My reasons for this are as follows:</p> <ol style="list-style-type: none"> 1.) There is sufficient land in urban areas to build upon which should be being utilised first. 2.) The population projection does not warrant for 12,000 houses. We do not have the infrastructure for jobs, schools and local transport to warrant this many houses. 3.) It will spoil the character of the area. 4.) Lever Causeway and it's open spaces provide an area for relaxation and exercise for innumerable local residents as well as wildlife. You agreed to build the path that now runs down Lever Causeway which many people use for exercise and just general walking enjoying the views. Lots of dog walkers use this path too. Lever Causeway field and we often have moles, pheasants, foxes and birds that visit our garden whom will live and feed off the land. To destroy their homes is completely unnecessary. 5.) Unrivalled views will be destroyed, irreparable damage to its setting. 6.) Increased traffic and major congestion. I cannot understand how this will be managed as mount road and the roundabouts at the top of Lever Causeway are already very busy. 7.) Acres of prime agricultural land will be lost. 8.) Damage to Mountwood Conservation area. 9.) The sites either side of Lever Causeway are huge. Once released from Green Belt, building could extend to Storeton, causing unrestricted sprawl, with historic Storeton and Bebington Merging. 10.) Use the Wirral's already empty 5,000 properties and the already existing space on brownfield sites for 18000 homes. 11.) There is an error in your Summary of Initial Green Belt Assessment September 2018. On page 52 the agricultural land use for SP030 has been classed as pasture and horse grazing. In fact, the land under SHLAA1819 on site SP030 is actually used for farming arable, and has been for many, many years. Recent soil reports show the site as containing very good quality soil. SHLAA1819 has already had a crop harvested this year and is currently growing winter wheat. The land further down Lever Causeway between Marsh Hey Covert and Little Storeton Village is also being farmed. Therefore a very large proportion of SP030 is actually used for arable farming and not horse grazing as indicated. At a Council Meeting on 15 October, Motion 3 was voted on and carried unanimously. The first paragraph of this motion reads, "This Council requests that renewed importance should be attached to the protection afforded to agricultural land as the responses to the Local Plan are considered. Land that is currently in productive agricultural use should not be removed from the Green Belt in view of the need to safeguard future food supplies." <p>Also, as this parcel of land abuts Marsh Hey Covert, and covers an area between Marsh Hey Covert and a copse behind Stanley Avenue, the notes should also include that the area may include supporting habitat, as there is evidence of badger activity, owls and bats in this area. The areas also give protection to other local wildlife whose natural habitat will be eroded by any development. There are a number of inconsistencies in both the methodology for the appraisal of existing Green Belt and more alarmingly in the basic assessment principles against individual sites being considered for release from the Green Belt. There is a concerning precedent being set in both the identification criteria of sites individual sites and also the Local Authority's willingness include such land parcels within their assessments.</p> <p>The following outlines some of the issues and inconsistencies to date which, if required, I would welcome the opportunity to discuss with members of Local or Central Government.</p> <p>The Overall Principle behind Green Belt Land release</p> <p>There have been consistent failures and poor information management by both Central and Local Government relating to the requirements to produce a Local Plan document and of more concern the statistical information relied upon with numerous inconsistencies and anomalies rendering the current consultation process flawed and inadmissible.</p> <p>There has been a persistent lack of formulation by Wirral Council to compile a meaningful and well-considered Local Plan which takes into account accurate and relevant population projections combined with realistic long-term development requirements. This has led to a hastily constructed Local Plan based on inaccurate out-of-date housing demand, population projection and economic migration figures which, at the time of writing this letter, have been again proven to be incorrect with revised Office for National Statistics (ONS) figures differing from those presented to during Wirral Council's consultation meetings.</p> <p>This may be due to inconsistencies in the dissemination of information by Central Government or indeed at Local Authority level, however, regardless of this, Wirral residents should not be faced with an ill-conceived ultimatum whereby areas of land are being consulted upon for release from the Green Belt due to an inaccurate, poorly managed and ultimately, inadmissible consultation process. Governments at a national or local level are elected to serve the people and handling such a sensitive, irreversible issue in an inaccurate and incompetent fashion is constitutionally flawed. In recent weeks there have been numerous press releases by opposition political parties at a local level and also by Peel Ports who have further highlighted factual and statistical inconsistencies in the information being presented during consultations.</p> <p>It is clear that Wirral residents do not support the release of Green Belt land apart from a small number of mercenary landowners who stand to profit from the situation. Indeed the Local Authority should be doing everything within their power to ensure that all available, Brownfield and non-Green Belt land is intensively and painstakingly assessed for development suitability regardless of the financial yield models of speculative housing developers. Areas of Green Belt land cannot be released simply because they are perceived to be 'spade ready' and not hampered by land remediation requirements that do not accord with Developers' financial models.</p> <p>It is abundantly clear that there are a number of influencing factors and inconsistencies which have contributed towards the current position and the ill-conceived 'ultimatum' being proposed by Wirral Council.</p>

DOR REF	RESPONSE
	<p>The Identification of Green Belt Land and Potential Sites - Including Proposed Green Belt Site SP030</p> <p>There appears to be a concerning precedent set whereby, local Green Belt Landowners have been actively lobbied by Developers to pre-register the transfer of land for the development of housing sites (including land parcel SP030) which brings into question the impartiality of such areas being considered for assessment for release from the Green Belt where the Landowner in question has been offered potential financial inducement to sell/transfer land ownership, which in turn make for an easier option for the Local Authority to approve and meet with development target numbers. The fact that Landowners are receptive to the advances of Developers' does not automatically mean land is suitable or indeed required to meet particular housing archetype requirements in a particular location. This logic undermines the impartiality of the process and, as with the general identification of Green Belt sites, (outlined above) is constitutionally flawed as Developers' speculative advances mean that impartial and consistent tests for the assessment of individual land parcels are compromised, thus rendering the consultation process fundamentally flawed and inadmissible.</p> <p>In addition to the practices being undertaken in the background which have compromised the impartiality of assessment, it is important to remember that there are also basic tests relating to the suitability of individual land parcels for release from the Green Belt.</p> <p>Green Belt Site SP030</p> <p>There is a consistent failure of tests which relate to the control of 'unrestricted urban sprawl' which would be see the historic delineation between Higher Bebington and the Lower Storeton Village eroded by development on a key remaining Green Belt site in Higher Babington leading to an obvious 'merging' of neighbouring settlements.</p> <p>One of the key considerations for the suitability of land for release from the Green Belt relates to the conservation of Local Heritage. SP030 is bordered by Lever Causeway, one of the most prominent Heritage features of the local built environment and any development adjacent to this historically significant environment will not "conserve locally important buildings or townscapes" and will be contrary to development appraisal criteria.</p> <p>Mountwood Conservation Area</p> <p>This parcel of land SP030, at Lever Causeway, provides the historic formal entrance to the remainder of the Historic Lever estate with the majority of the upper portion of SP030 also comprising the formal boundary of the Mountwood Conservation Area whose character is exemplified by the views at the Southern border at Stanley Avenue to open countryside across the Green Belt land parcel SP030 (See [consultant] report January 2005 commissioned by Wirral Borough Council). Indeed this will not accord with the requirement to preserve and enhance the character and appearance of the Mountwood Conservation area.</p> <p>[Green belt exert 5.21 provided]</p> <p>It is quite apparent that Green Belt land parcel SP030 has a significant impact on the Mountwood Conservation area boundary and as stated in Wirral Council's own correspondence, they have a "legal duty to pay special attention to the desirability of preserving or enhancing, the potential to affect these designated areas " There is a clear legal obligation upon Wirral Council to preserve this relationship and as such, the proposal for even considering land parcel SP030 for further assessment is both legally and technically flawed.</p> <p>Current Agricultural Land Use of SP030</p> <p>A further issue that renders Land Parcel SP030 unsuitable for potential release from the Green Belt is that Wirral Council has motioned ".....Land that is currently in productive Agricultural use should not be removed from the Green Belt in view of the need to safeguard future food supplies". It should be noted that Land Parcel SP030 is productive agricultural land used for growing various crops including peas and wheat. There is a factual error within Wirral Council's Initial Green Belt Assessment whereby SP030's use has been identified as 'pasture and horse grazing' when in fact the land is used for arable farming with independent reports showing it to contain "very good" quality soil. Regardless of current Land Owners' desire to farm and rotate crops, the land has a productive agricultural use and cannot be considered for release from the Green Belt.</p> <p>To summarise, The Wirral peninsula is blessed with an enviable accumulation of Green Belt land, which should be developed upon as the result of negligent and incompetent process planning driven by inaccurate data further compromised by the actions of profit hungry speculative developers.</p> <p>I would remind Wirral Council, that they are elected representatives in post to protect the interests of local residents and provide objective, accurate and well considered information on matters of public interest.</p>
DOR00778	[SAME AS DOR00783]
DOR00779	<p>Wirral's green belt is presently well used and enjoyed by local residents and visitors alike undertaking many outdoor and leisure pursuits; we can also boast of agricultural, pasture and dairy land use, so it's just not a leisure/tourist attraction it's actually employed in food production. Storeton (an old historic village, mentioned in the doomsday book 1086) where I currently live is surrounded by all these activities which adds to its uniqueness and clearly identifies itself as one of Wirral's last clearly identifiable/distinct villages, not yet consumed by urban sprawl as many villages on the Wirral can testify to i.e. Pensby, Upton, Irby, Greasby, Thingwall, Heswall etc where there is no distinct differential between them other than road signs indicating former village boundaries.</p> <p>The council regularly market the Wirral as "the leisure peninsula", with its green credentials and rightly so. However this looks very shallow considering this proposed green belt development, it's testimony by the fact that this marketing strategy is still employed today by Wirral Waters; "It is imperative to create a fascinating place that entices multiple occupants at Wirral Waters, part of this involves creating a compelling landscape to celebrate what the Wirral is famed for – beautiful countryside and breath-taking scenery Forming part of the Wirral Waters master plan is the landscape</p>

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	<p>strategy which is paramount in helping transform the environment through the delivery of green infrastructure". (source:https://www.rw-invest.com/wirral-waters/).</p> <p>It seems that Wirral council, when formulating this current local plan have taken no regard to the 5 purpose of green belt (source; www.gov.uk) particular to Storeton village.</p> <ol style="list-style-type: none"> 1. Check the unrestricted sprawl of large built-up areas: Unrestricted urban sprawl would undoubtedly occur if land around Storeton village were to be released from Green Belt. Sprawl from several towns in all directions. Once merged into Bebington/Prenton the village of Storeton would be lost. 2. Prevent neighbouring towns merging into one another: Storeton is neighboured by Bebington, Barnston, and Prenton. Releasing the areas indicated on the published maps would encourage the merging of Storeton with all these other villages/towns particularly Bebington thus contrary to this purpose. 3. Assist in safeguarding the countryside from encroachment: The countryside in Storeton is well utilised by not only leisure activities, but also by traditional countryside businesses as stated above. We have dairy, livestock and agricultural farms as well as equestrian centre. The green belt also provides space and clean air for all to enjoy. The release of this land will threaten all these business and leisure pursuits. 4. Preserve the setting and special character of historic towns: It goes without saying that enabling the unrestricted enlargement of Storeton Village would endanger this setting. The views across the locality are unrivalled. Unless the Green Belt is maintained then Storeton will change irrevocably from a hamlet/village to a large town which cannot be distinguished from any other town around it. 5. Assist in urban regeneration, by encouraging the recycling of derelict and other urban land. What has become evident during the consultation process is there are areas of the Wirral which have been underutilised and were there been an unwillingness by the council to encourage or incentivise developers to build of Brownfield sites. The excuse certain Brownfield sites are too small or too contaminated and therefore cannot be considered "viable" alternatives to the cheaper option (for developers) of destroying greenbelt. This excuse is a total let down and demonstrates a lack of vision by our council. There needs to be a will to make these sites viable. It seems that we have relied on Peel Holdings (Wirral Waters) to meet our housing needs and comply with government requirements. Thus resulting in parts of the Wirral left with small packets of development opportunity left wasting. <p>There should be an effort to focus on these undeveloped areas not make it easier for developers to build on green field land. Only when all brown field sites have been utilised then we should consider other alternative sites. The release of green belt land only incentivises and prioritises its use over brown field sites, of which we have large amount.</p> <p>There now seems to be some doubt over the use of the government provided methodology statistics which this proposed local plan is based, in addition Wirral employed this methodology without question even though the data contained within conflicted with the councils own data (Wirral Compendium). At the meeting held at Wallasey town hall (September 3rd) Wirral council [council officer admitted that WBC were not aware that they could challenge the governments methodology and therefore the resulting outcome. However it is now my understanding the [Council Leader] has written to the secretary of state challenging the housing targets based on this methodology and current ONS (Office of National Statistics) projections are now being provided. It would now seem logical to reassess and reflect upon the current situation knowing what we know and at least attempt to plan to provide homes that reflect the Wirral's, needs not some questionable target that may or may not transpire (remember once green belt is built on, it has gone and becomes Brownfield if we need to cancel or change the use). Further to the 20% penalty, this is absolutely absurd what is the point in building a further 20% more homes on top of already questionable numbers, if they are not required. This is just a penalty for the sake of a penalty and does not help or address the situation. (i.e. what number and type of homes does the Wirral actually need for the future)? This penalty needs to be robustly opposed, it's just nonsensical.</p> <p>Wirral's proposed approach to meet this local plan requirement is nothing short of civic vandalism (all green belt east of the M53 corridor from Prenton to Eastham being red circled, if implemented would almost denude the east side of the Wirral of any notable green belt and/or open space, as indicated by your own council officer (Hulme Hall consultation meeting September 10th). This situation is further exasperated by the fact that within the borough boundaries over 500 acres of the semi-derelict land lay redundant (Birkenhead dock system/Wirral Waters: https://www.rw-invest.com/wirral-waters/). In fact Peel holdings (Wirral Waters) plan to deliver "Residential opportunities totalling 13,500 dwellings to be spread across seven site phases including Northbank East, Northbank West, Marina View, Vittoria Studios and Sky City".(source: http://www.peelstrategicwaters.co.uk/development/wirral-waters-merseyside/). Further inspection of the aforementioned web sites indicates a vast mix of residential housing (also commercial and business), is this not sufficient to meet the boroughs main housing requirements?</p> <p>To Summarise; I strongly urge Wirral Borough Council to reconsider the elements which expressly impact the reduction of all greenbelt in the Wirral, particularly around the historical village of Storeton. I strongly recommend that the council clearly have a good understanding as where the Wirral Waters proposed scheme sits in respect to our housing number requirements. The Wirral Waters Development may meet this target (after all it was designated a housing zone in 2017 by central government making it the only project in the whole country and is part of the government's strategy to provide one million new homes by 2020 https://www.rw-invest.com/wirral-waters/) without the need to destroy the green belt, or vast parts of it. The Wirral is in a unique position being surrounded on three sides by water thus limiting the extent of land available for urban expansion; this should be the driver to prioritise the use of brown field sites. I strongly feel that all brown field sites and Wirral has plenty i.e. Birkenhead/Birkenhead docks, New Ferry, Bidston etc should be employed as an absolute priority before any consideration is given to any green belt development (what a great opportunity to redevelop these towns). The local plan should focus on real population estimates, and the use of brownfield sites as an absolute priority. Once our green fields have gone they are gone.</p>

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DOR00780	I am fully committed to maintaining the integrity of the Green Belt on the Wirral and consider the whole Local Plan to be ill thought out.
DOR00781	<p>The starting point must be the perceived need for additional housing in the Strategic Housing Market Assessment. That Strategic Housing Market Assessment was made by the Wirral Borough Council in the development of a Local Plan. It is for a Local Authority to consider the housing need and, having identified that need, to consider land availability, constraints such as Green Belt , and the special circumstances which apply to peninsulas , and whether any need might be met in neighbouring areas.</p> <p>In 2018 the population of Wirral is 321,238. During the 10 years to 2010 the population fell. In the period between 2010 and 2018 the population levels remained largely static. In the period since 2001 assumptions that the population would rise have proved to be wrong. Predictions made in 2001, 2012 and 2014 wrongly assumed a population increase. In fact there has been a net decrease with negative net migration. The correct approach now would be to rely upon the actual up to date figures which do not support a need for any substantial increase in housing provision</p> <p>The figures for projected housing "need" have changed over the past 5 years as the reality of the actual "need" has become clearer. In the Wirral Strategic Housing & Employment Assessment in 2012 by Wirral Borough Council it was said to be between 875 and 2235 units per annum. The figure reduced to 730 per annum in the Liverpool City Region Strategic Housing & Employment Land Market Assessment in 2014. The figure advanced in the Wirral Borough Council's Strategic Housing Market Assessment in 2016 and based on the calculation made then using national figures provided by the ONS at that time was 803 per annum. The obvious imbalance referred to above resulted in a reworking of the Wirral Borough Council figure based on the latest Office for National Statistics figures in September 2018 and is said to produce a figure of 488 per annum. Even these reworked figures are likely to be too high. The methodology assumes a higher level of inward economic migration than is realistic taking into account previous experience and the realities of the population figures over the past few years. The underlying trend is for the population to decrease , particularly in the urban areas. This location has played a major part in the way Wirral has developed over the centuries and has influenced the character and attitude of those who live on Wirral. The geographic location and nature of Wirral are important both when considering the housing "need" and the significance of the "Green Belt".</p> <p>"It is fair to say that a significant proportion of the working population of Wirral commute to work elsewhere. I have mentioned the lack of economic migration above. The point has also to be made that many more Wirral residents commute to work in Liverpool, South Lancashire, Cheshire, North Wales and, to an increasing degree, Greater Manchester than those who come into Wirral to work. This is particularly so given the loss of heavy industry , and employment therein, which has occurred progressively since the 1960s Thus the situation of the Wirral , bounded by water on 3 sides and with a reducing population amounts to a special circumstance when considering the question of "need", and as a matter of Law the Local Authority has a statutory obligation to consider this</p> <p>The development required to meet the structure and need of the population</p> <p>The underlying core population has diminished during the 21st century and is expected to reduce further by 2.5 % in the next 15 years. It is recognised that the National Planning Policy Framework looks to homes, premises occupied as homes by one or more people, not simply population figures. The Wirral Borough Council believes that, despite the population reduction there is a need to replace some existing stock and for building to enable downsizing and for those with disability suggesting that this need for housing is expected to increase.</p> <p>Using the Government formula and the latest figures from the Office for National Statistics the Wirral Borough Council say that 7320 homes will be required over the next 15 years. Others have calculated a lower figure. Around 3100, can be built on Brownfield sites, making a generous allowance for those sites which present difficulties as a result of contamination. The Wirral Borough Council currently bring around 260 houses back into use each year as a result of restoration and refurbishment. That will continue and it is logical to conclude that the program for doing so will reduce further the number of fresh developments needed. The result is that over the 15 year period some 3900 houses are likely to be brought back into use . Peel Holdings at Wirral Waters will provide at least 842 over the next few years. Thus even if , despite the gradually reducing population , the Council's figures are correct any net further development required is eliminated . Furthermore, even if the rate of refurbishment could not be sustained and only perhaps 3000 units were brought back into use, fewer than 400 further dwelling units are needed</p> <p>The effect is that any additional need can easily be managed without recourse to encroachment on green belt</p> <p>Errors of Principle : Buffering</p> <p>There are other aspects of the Council's approach which are erroneous . First the Wirral Borough Council has sought to include a Buffer in the calculations for housing need of 20%. This is an error of principle :a buffer is intended to make allowance for previous under delivery of housing requirements. The National Planning Policy Framework does not require the addition of an increased requirement in the number of houses needed. It provides for the "buffer" to be moved forward from later in the plan period thus altering the timetabling of housing provision. That results in the removal of the "buffer", as an additional figure altogether : it merely shifts the time at which an already promulgated development is actually realised. Further, when considering what land is available for development , any rational assessment requires that account be taken of the impact of "land banking".</p> <p>"No such assessment seems to have been made. How much land for development is owned with planning consent but not being developed? The National Planning Policy Framework now looks to houses built rather than planning permissions granted. Thus planning consents granted cannot count towards the numbers available. But since that land will be developed at some time during the period land upon which planning permission has been granted but which has not yet been developed should be included in the "Windfall" adjustment which is dealt with below.</p> <p>Errors of Principle : Windfall sites</p> <p>Wirral Borough Council has provided for only 60 sites per annum becoming available but which were not foreseeable. That is unrealistically low and does not take account of what is actually</p>

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	<p>happening. I have referred to “land banking “sites above. Such sites will become available within the 15 year period and their proper inclusion would increase the “windfall” provision. As the computation has not been done it is difficult to estimate the impact , but even if the 60 were realistic, producing 900 over the 15 year period, it would obliterate the numbers required (even on the most pessimistic rational assessment) of fewer than 400 units , as demonstrated in paragraph 14 above . . Further no account has been taken of the many examples of single large properties being sold and then developed as sites for multiple occupation either as houses or more often as flats or apartments. This is particularly common in Oxton, Prenton, Wallasey and Hoylake /West Kirby .</p> <p>""Windfall"" sites should reflect these additional sites coming up for sale and redevelopment as reducing the total calculated need. There has been a trend towards this for some years which has gathered pace recently. There many examples of a single household disappearing to be replaced on the site by multiple flats, apartments or houses. In Heswall alone there are currently a number of such schemes with four large properties set to provide some 30 new households.</p> <p>"There are other developments where large properties are being demolished and a number of smaller houses developed on the sites increasing the number of houses still further. The likelihood of further such schemes must be regarded as ""windfall"" and must be taken into account when the actual figure for new households needed is considered. There is every reason to believe that schemes of this sort will continue into the future across the Borough as older householders sell larger plots. Including a “windfall” provision for 60 per annum is far too low. An overall figure for “windfall” of 200 housing units per annum is a very conservative estimate and , as already shown , even on the Council's unrealistic figure of 60 per annum, the future need for smaller units is amply fulfilled</p> <p>Realistic estimates of population must be used in order make any rational assessment of any growth in numbers of properties needed . The population was at best static up to 2000 but is now actually falling. It is predicted to fall further. There is no significant inward economic migration. Such growth in need as there is arises from relocation within Wirral and the numbers of households where the head of the household is elderly and household needs have changed. There is no likelihood of significant growth in Wirral such as would require a higher calculation of future housing needs.</p> <p>The result is that it is arguable that there is no shortfall at all, and even on the most pessimistic assumptions , any annual need for extra development is minimal</p> <p>GREEN BELT</p> <p>Even if it had been established that any “need” existed which is unmanageable , encroachment on the Green Belt has to be considered in determining the identification of suitable, available and deliverable land.</p> <p>The Statutory Framework of Green Belt</p> <p>The National Planning Policy Framework applies. This identifies the five purposes of Green Belt : to check the unrestricted sprawl of large built up areas, or prevent "</p> <p>"neighbouring towns merging into one another, to assist in safeguarding the countryside from encroachment, to preserve the setting and special character of historic towns and to assist in urban regeneration by encouraging the recycling of derelict and other urban land.</p> <p>Once Green Belts have been defined, local planning authorities are under a duty to plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.</p> <p>A local planning authority should regard the construction of new buildings as inappropriate in Green Belt. There are some exceptions: buildings for agriculture and forestry, provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as they preserve the openness of the Green Belt and do not conflict with the purposes of including land within the Green Belt. There are also exceptions for: the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building, the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces; limited infilling in villages, but not between villages ; and limited affordable housing for local community needs under policies set out in the Local Plan. Also permitted are: limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.</p> <p>"National Planning Policy indicates that the Government attaches great importance to Green Belts the essential characteristics of which are openness and permanence. Once established Green Belts should only be altered in exceptional circumstances. Inappropriate development is harmful and should not be approved except in exceptional circumstances. It is recognised that once Green Belt is established, as those in Wirral are established, their beneficial use for sport, recreation, biodiversity, landscape and visual amenity is of overriding importance. In an area such as Wirral the facility and attraction provided by the Green Belt is of great value to the whole community encouraging recreational pursuits and attracting tourism. It is imperative to protect the Wirral's coastal distinctiveness and internationally important habitats. Consideration of the Wirral west coast, which is a distinct area of significance, must be undertaken as an individual and separate exercise.</p> <p>The Wirral Green Belt was last reviewed in 1983 with some minor adjustment in 2000. It includes 45% of the land in Wirral. This is a bastion protecting the countryside and thus the very nature of Wirral. There is already a larger proportion of developed land in Wirral than in other comparable areas. The initial proposals made by the Wirral Borough Council involved substantial encroachment on the Green Belt, some 22.5%, and it is to the aspect of encroachment that this Part of this response is directed. Further, the special characteristics of Wirral as a peninsula increase the importance of Green Belt, as there are , with water on 3 sides, only one-quarter of the opportunities to travel to adjacent areas . Thus the protection of Wirral's open spaces is of paramount importance, and a primary statutory duty of the Local Authority</p>

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	<p>Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in exceptional circumstances. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. Exceptional circumstances will not exist unless the potential harm to the Green Belt, by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.</p> <p>There is a considerable amount of case law in the High Court on the meaning of ""exceptional circumstances"" particularly referred to in <i>Carpets of Worth Limited v Wyre</i> "</p> <p>"Forest District Council and Gallagher Estates & Lioncourt v Solihull MBC .Whilst each case is fact-sensitive, and the question of whether circumstances are exceptional for these purposes requires an exercise of planning judgment, what is capable of amounting to exceptional circumstances is a matter of law, and a plan-maker will err in law if he fails to adopt a lawful approach to exceptional circumstances. Once a Green Belt has been established and approved, it requires more than general planning concepts to justify an alteration. Planning guidance is a material consideration for planning plan-making and decision-taking. However, it does not have statutory force and remains subservient to statutory obligations : the only statutory obligation is to have regard to relevant policies. Exceptional circumstances are required for any revision of the boundary, whether the proposal is to extend or diminish the Green Belt. Once a Green Belt is designated as a matter of general principle the Authority must determine whether there are exceptional circumstances which must both justify development and clearly outweigh the harm that such would cause to the Green Belt.. In an area such as Wirral the facility and attraction provided by the Green Belt is of great value to the whole community encouraging recreational pursuits and attracting tourism and therefore prima facie unlawful</p> <p>Land between Milner Road and Thingwall west of Barnston Road</p> <p>This area of Green Belt is of fundamental importance in achieving the statutory obligations of checking the unrestricted sprawl of large built up areas, or preventing neighbouring towns merging into one another. If this area were developed , Heswall would sprawl unchecked to the point of the old Birkenhead boundary.</p> <p>The pressure on local facilities, particularly schools and healthcare, both of which are already under very considerable pressure, would be exacerbated, and precisely</p> <p>"the same problems of traffic would arise as dealt with in 31 above, the Barnston Road again being singled out by the Borough's own Highways department as being a road with a poor safety record</p> <p>Furthermore, this area of Green Belt includes within it the western part of Barnston Dale, an area of natural beauty which would be impossible to replicate by any alternative provision . Once destroyed, this situation would be impossible to rectify , and would represent a loss of local amenity out of all proportion to any benefit gained (none being remotely conceivable) from development of this area</p> <p>In addition , this area is very poorly served by public transport and this militates against any successful development of this land, particularly where such development may be directed towards occupation by the elderly and/or infirm</p> <p>Permitting the development of this land would also constitute an infill between the townships of Pensby and Thingwall, Heswall and Barnston , Barnston and Pensby , and Barnston and Thingwall , and thus in four separate respects be a breach of the statutory obligations already referred to in 22 and 32 above</p> <p>For these reasons, again any finding that despite these defects, an exceptional circumstance arose would be irrational and therefore prima facie unlawful</p> <p>Following the earlier Consultations the land between the Wirral Way and the Dee coast in Lower Heswall is retained within Green Belt in the draft Local Plan upon which this consultation takes place. There may, however, be revisions to that draft Local Plan following this consultation. Further there is reference to this area in one of the schedules produced by Wirral Borough Council alongside the draft Local Plan. It is, therefore appropriate to draw attention to the grounds for strong opposition to any proposals that might suggest development in this sensitive and important location.</p> <p>The Foreword to the Wirral Biodiversity Action Plan states: "Wirral is sometimes described as "England in miniature" and for a peninsula of only sixty square miles with "</p> <p>"a population of over 300,000, the range and diversity of species and habitats is breath-taking. The richness of Wirral's biodiversity is also one of its best kept secrets. Take Hilbre Island for example: few of the thousands of people who visit this rocky outcrop in the Dee Estuary each year realise that, as well as playing host to seals and a great variety of visiting birds, it is one of only three sites in North West England for the rare and beautiful Rock Sea-lavender plant. The North Wirral Coastal Park is home to the only site in England for the Belted Beauty moth and the very rare Natterjack Toad is making a comeback in the sand dunes at Red Rocks near Hoylake. Significant areas of the increasingly threatened lowland heath habitat are found at Heswall Dales and Thurstaston. Add to this the hundreds of thousands of birds that spend each winter on the mudflats and saltmarshes of the Dee and Mersey Estuaries and it is obvious that Wirral is no ordinary place.</p> <p>Each of these species and habitats makes a small but important contribution to the variety of life found in our area and on our planet – in other words it's biodiversity. Many need careful management by people in order to thrive – particularly in a densely populated area like the Wirral"</p> <p>The Wirral Borough Council must have regard to National Guidelines and its own statements including, for example, The Landscape Policy in relation to Dee Coastal Farmland. The Dee Estuary is of international importance and is designated as a Ramsar site and a Site of Special Scientific Interest. It is also a Special Area of Conservation and strictly protected under the EC Habitats Directive as an important high-quality conservation site that will make a significant contribution to conserving the 78 habitat types and 43 species identified in Annexes I and II of the Directive as occurring in the UK. These designations, of course, underline the special nature of the area considered in this response.</p> <p>"It is of concern that, notwithstanding that the coastal strip between the Wirral Way and the shoreline, quite properly, remains within the Green Belt "infill" proposals are being made that undermine its status and weaken its protection. It may be that the intentions have been misunderstood but it appears to be a cynical attempt to defeat the very purpose of this area being Green Belt. The</p>

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	<p>suggestion of "infill villages" in the Green Belt area between the Wirral Way and the Heswall Shore has been raised as a future possibility for the coastal strip which remains included in the Green Belt. The concept of creating new "garden suburbs/towns adopting the sort of "new town" concept of Port Sunlight" is quite unrealistic and there is a need for the Wirral Borough Council to resist that now. Whilst congratulating the Council for including the coastal strip in the Green Belt consideration of the same points that were made, and accepted, in relation to removal of the area from the Green Belt remain relevant in relation to "infill" or "infill villages" between Banks Road and Parkwest, Parkwest and Seabank Road then Seabank Road to Riverbank Road and beyond. The farmland between the Wirral Way and the coast is of special significance as open land of which there is a limited amount in the Heswall area. It is prime agricultural land currently in use as such. The acreage of farmland far exceeds the very small acreage occupied by the existing properties some of which have been in situ since the 19th century. The small number of existing properties, well-spaced apart, do not detract from the rural nature of the area and the "infill" concept certainly cannot apply. Development of "villages" would be inconsistent with the rural nature of the area, detrimental to the wider area, damaging to wildlife and, in reality, merely a vehicle for avoiding the protection afforded by Green Belt status which has, quite properly, been retained. Filling in between existing roads would, in reality, be destroying that area of Green Belt and coastline in a "backdoor" fashion. What appears to be suggested is not "limited infilling in villages" but large scale development. The current suggestion of "infill" or "infill villages" would clearly contravene the need to preserve the Green Belt against clear, obvious and unnecessary "detriment.</p> <p>These would adversely impact on the openness of the Green Belt and the clear need to protect the visibility and identity of the coastal strip. In effect there is a wildlife corridor which requires the integrity of the coastal strip. Filling in these areas would not be sensible and would not be consistent with the maintenance of the Green Belt. In addition, as has been said before, there are major environmental and infrastructure problems. The purpose of this part of my response is to demonstrate that there are substantial grounds for those areas not be so assessed as suitable for development or released for that purpose.</p> <p>The environmental impact of assessing land along the Wirral west coast, currently in the Green Belt and comprising the shoreline and open land adjoining the shore between Target Road and Cottage Lane in Heswall as suitable for housing development would be severe.</p> <p>Wildlife thrives along the coastal strip. There are badgers, a protected species, bats, again protected, nesting owls, buzzards and many smaller nesting birds, invertebrates and reptiles. Peregrine Falcons are seen regularly. Substantial numbers of wildfowl and wading birds feed on the Estuary and on the coastline in this vicinity. The Estuary is a major area of international significance for migrating birds, particularly waders and the impact and disturbance of development on the coast line, such as building works, introduction of residential properties and attendant traffic, together with likely weedkiller/fertilizer seepage and increased human presence, both on the shore line and on the shore itself, would be substantial. The destruction of the habitat on the coastal strip would have a major impact on the wildlife currently resident there. It should be borne in mind that the structure of the wildlife population is such that those in the food chain support life in the immediate area and over quite a large surrounding area including the Estuary. The Wirral Borough Council has prided itself in fostering wildlife and interest in wildlife with events such as the Wader Festival. This brings visitors and prestige.</p> <p>"There would be substantial detriment to the local wildlife which would impact over the wider area and the nearby Wirral Way. The importance and significance of the wildlife and its preservation is reflected in the inclusion of the Estuary, marshes, wetlands and coast line, as a Site of Special Scientific Interest protected as such. The Estuary, including the areas mentioned above, is also included as a Special Protection Area under the European Birds and Habitats Directive and is included in the Ramsar Wetland Convention. These are an indication of the importance of the West Wirral Coast to the wildlife not only of those species resident in the UK but also those species who migrate annually to and from this special area of coastline.</p> <p>The foreseeable impact on wildlife, including mammals, birds, insects, invertebrates and amphibians to be found in the area by destruction of habitat and interference in a natural "corridor" used by all wildlife would be catastrophic. It is clearly necessary to include all resident and migratory wildlife since there is clear reliance between species including in relation to provision of the food chain. The Wirral Borough Council recognises the importance of the preservation of the wildlife in this Internationally renowned and significant location. Great emphasis is placed on the European Directive and its impact. Whilst that Directive clearly has legal implications the Authority should recognise and seek to protect these areas whether that Directive continues to apply or not. It is also necessary to bear in mind that other wildlife in this area is important. The SSSI and the Convention are also important indicators of the significance of this part of the Wirral west coast. In the light of National and International recognition further comment from me would be superfluous. Development would be to the substantial detriment of the important wildlife finding habitat and sanctuary along this coast and the status of the Wirral Borough Council both nationally and internationally. The Wirral Borough Council has prided itself in fostering wildlife and interest in wildlife and ought not to abandon that now. A "significant impact" test goes some way towards recognising the exceptional importance of the area but not necessarily the ability and persistence of those seeking to develop whose concerns are not for the reputation of Wirral Borough Council nor preservation of the wildlife and habitats for the greater good of all. The land uses are settled and long term. Any development of these "</p> <p>"areas would have an adverse effect on the Wirral's agricultural resources as a whole and would prejudice the continued productivity and viability of those holdings. The arable fields are well tended and in continuous cultivation producing crops. The Livery Stables are an important amenity, both for those who use them and for those who make use of the adjacent Wirral Way where the presence of horses and riders enhances the enjoyment of visitors.</p> <p>There are also landscape issues to consider. The landscape in this area, with unparalleled views of the estuary and North Wales coast, is of particular importance providing a unique backdrop for those using the Wirral Way and the footpaths and lanes for recreational purposes. Its value to the community is immeasurable and its loss would be irreplaceable and tragic.</p>

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	<p>The area is used for recreation including riding, cycling, jogging and walking all of which are catered for in a rural environment. The loss of that environment would have a detrimental effect on the area and on the activities of those who currently enjoy recreation in the countryside of West Wirral. The attractive views across the river from the roads and Wirral Way would be also be lost. The enjoyment and value of the Wirral Way is greatly enhanced by the views across to the Estuary and the wildlife of the coastal strip. There is National Guidance on the protection and conservation of landscape produced by Natural England. No doubt the Wirral Borough Council will take account of its own published statement "Dee Coastal Farmland" and the aims and guidance set out in that, which recognise the importance of the area, and very clearly apply to the coastline being considered. In that document the Wirral Borough Council states "The landscape strategy for this character area is CONSERVE. Emphasis should be on continuing the present management of the area and maintaining the features and elements that convey its strong sense of character"</p> <p>"Work has started on the England Coast Path, a new national trail around England's coastline providing rights of access and ""spreading room"". Clearly this would include access along the West Wirral coast with an important future role for local recreation, appreciation of the area and tourism opportunities with minimal, if any, effect on the wildlife, biodiversity or use of Prime Agricultural Land where the path is likely to be sited.</p> <p>The Infrastructure</p> <p>Leaving aside the substantial, if not overwhelming environmental issues and the benefits for recreational use there is lack of infrastructure to support development in all these areas. The fact that there are major infrastructure concerns about development in these areas in addition to the Constraints referred to above is an important additional consideration. In addition, it must be recognised that the effect of each successive development is cumulative in creating stress upon already inadequate public services</p> <p>The current roads already under palpable stress from existing volumes of traffic are inadequate to cope with an increased volume of traffic. Any increase in traffic from the Heswall end of Barnston Road would create an unacceptable safety concern over and above that which already exists : traffic through Barnston Dale already creates considerable bottlenecks at Barnston at peak hours, and further on the Gills Lane/ Barnston Road junction is particularly dangerous, and because of the physical topography is not susceptible to improvement</p> <p>In addition to the difficulties and safety concerns already identified in relation to the A540 and to Barnston Road, there are wider concerns about Heswall's ability to cope with further traffic. The A540 frequently has queues stretching from the Poll Hill Road to the Catholic Church, a distance of about 0.5 miles. Milner Road and the Downham Roads are quite unsuited to additional volumes of traffic. The Bus services along Barnston Road are now diminished almost to the point of disappearance."</p> <p>"The roads through Lower Village and down towards the Dee are already used to capacity. The junction giving access to Delavor Road is subject to high traffic levels. The turn from Delavor Road into Thurstaston Road is narrow and congested. Delavor Road is steep with a pronounced bend on the approach to the former Railway Bridge and Wittering Lane impeding visibility in both directions. Thurstaston Road and Dee View Road/The Mount are narrow, twisting and frequently congested: quite unsuitable for any additional traffic. At the other end Station Road bends sharply. It is frequently congested now. There is restricted visibility for traffic emerging from Station Road into Village Road creating a hazard. Davenport Road is often congested and its use by large numbers of walkers and cyclists riding along the Wirral Way, which makes use of the road at this point, and the presence of horses and riders creates an additional hazard. Davenport Road is at capacity now, particularly in the evenings and at weekends. The bends at the northern end of Lower Village where Village Road becomes Thurstaston Road are severe and already hazardous. Traffic through Lower Village itself is at maximum capacity and exceeds that on weekday mornings and evenings. There are Primary Schools at both ends of Lower Village resulting traffic hazards and in the presence of young pedestrians through the Lower Village area. St Peter's Church is situated in the Lower Village and its regular use for Church services on different days and at differing times of the day creates further pressures. Many pedestrians use and cross the narrow congested Village Road.. Local Bus Services are diminishing in both number and frequency and thus a reduction in private traffic is unlikely to be achieved. . Full particulars are given in 57 below</p> <p>There are concerns about facilities for water and sewerage. The current system just about copes although there have been problems in Parkwest in recent years.</p> <p>"The present facilities would not be adequate to handle greatly increased usage and neither the water/sewage facilities in Riverbank Road nor Target Road would cope. The area is at the foot of a hill making for additional problems with water and sewage services. The risks of foul waste pollution and flooding by groundwater would increase substantially if there was increased demand or usage. There are concerns in relation to communications and access to speedy reliable internet services. Although some fibre optic cable has now been laid most properties in the area are still using final connection by old copper cable telephone lines and the Internet service is variable. Increasing the capacity would be expensive and difficult and without increasing and improving the existing services any additional service usage would place unreasonable strains on a system that only just satisfies current demand</p> <p>Local shops and schools are not adequate to cater for an increased population. The two Primary Schools in Lower Heswall are already full and gaining entry can present problems for the current school age population. There are now few shops in Lower Village. The Post Office and Pharmacy have both gone. There are inadequate parking facilities. There is no current capacity to satisfy the needs of an increased population. Of course there must inevitably be a risk that the demands of an increased population, a greater volume of traffic and higher numbers of pedestrians in the Village would present safety issues and effect the charm of what is rightly recognised as a Conservation Area.</p> <p>The public transport is inadequate. A small bus runs at each end of the area providing a ""feeder"" service to Heswall bus depot. For most of the day there are no services passing through the Lower Village linking the Lower Village with other areas or places where the population would likely be employed. This has the effect of increasing the need for cars when many efforts have been made to reduce car usage. Subsidies for decent bus services have declined over the years. The railway station is some distance away with no linking bus service. Notwithstanding that the intention of the</p>

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	<p>government now appears to be taking traffic off the roads moving an increased "population in and out of the Lower Village area by public transport would be problematical and increased traffic inevitable, and given the discontinuance of all Avon bus services, this now applies to much of the periphery of Heswall as a whole .</p> <p>In introducing the contents of its current Visitors Guide the Wirral Borough Council states: "Seven centuries ago the enterprising Benedictine monks built a ferry 'cross the Mersey and so opened up the lonely headland for others who would come in the centuries ahead. What they found was a Wirral wonderland with coast and countryside among the finest in Britain. The spectacular hills, shores and cliffs home to boisterous seabirds and a wealth of wild sights and sounds are still part of the natural, awesome and free spectacular which greets every visitor". It would be ironic, and tragic, for the Development Plan to negate these attractive aspects of the area which the Council trumpets</p> <p>Conclusion</p> <p>The Green Belt is a precious asset for the benefit of the whole community. The Wirral Borough Council should hold the line between the local community and the political interests of Government and the commercial interests of developers neither of whom pay much regard to the interests of the local community. Further , it is under statutory obligations in relation to Green Belt which it neglects at it, and its councillors, economic peril</p> <p>Avoiding destruction of the Green Belt should be a priority. The encroachment onto the Green Belt today may be the Brownfield site of tomorrow. Once gone the Green Belt areas are lost for good. . Whilst Constraints may be imposed in relation to particular locations , they may not provide the protection necessary in those areas when political and commercial pressure is applied . In the long term interests of the Wirral , its residents, and its visitors who enjoy all kinds of recreational pursuits visiting areas where the intrusion of urban development is minimal more not less stringent control is required .</p> <p>Failure to apply such control may destroy much of the local economy . The Wirral's western and northern coasts are separate and distinct. The Wirral has unique qualities. It is important both nationally and internationally. It is already an area visited and used by the wider community taking advantage of the opportunities it provides for recreation and taking other interests in all that the area has to offer, this now being of considerable economic importance . The infrastructure supports tourism and visitors , albeit with difficulty , but would not support development. The areas should remain within the Green Belt assessed as not suitable for development of any kind. No exception justifying relaxation of the Green Belt restriction applies.</p>
DOR00782	<p>I would like to register my objection to the Wirral Local Plan, especially concerning the proposal to release Green Belt land that is to the east of the M53 (that is between the M53 and the River Mersey). It has long been recognised that this region is less healthy with a higher mortality and morbidity rate, poorer economically having a higher level of unemployment, a higher crime rate and higher levels of social deprivation than its more illustrious neighbourhoods situated west of the M53. For further elucidation of this problem see BMJ 2004;329:52. Fundamentally I believe the Wirral Green Belt is there for the benefit of both the affluent and the poor alike and that any reduction of its size is detrimental but when the reduction of this facility is greater in the more deprived area it is inconceivable, morally wrong.</p> <p>The Victorians were aware of the mental and physical benefits of green open spaces easily accessible to the less fortunate; consequentially Birkenhead Park was created in the 1840's. Now the population of the Wirral is so very much higher every metre of our countryside is a precious commodity, it must not be squandered, decimated, defiled. It is needed to reduce obesity, to improve mental health, cardiac fitness and subsequently reduce the healthcare burden. In this region the detrimental effect of the building within the Green Belt will have repercussions that are not only costly but long term. There is no short-term gain. There are urban sites available for building houses sufficient for Wirral's needs. There is not the overwhelming requirement for houses that may exist in the home counties.</p> <p>I was shocked to read that Peel Housing has reneged its promise for 13,000 homes. Such behaviour is scandalous, but the disadvantaged of eastern Wirral should not have to suffer further deprivation for corporate greed.</p>

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DOR00783	<p>Housing Need and Availability</p> <p>You will no doubt be aware that the latest re-iteration of the Local Plan is undertaking a consultation process prior to finalising the Local Plan, which will form the basis of planning for housing development and other forms of development, e.g. business, etc., for the next 15 years and specifically for the next 5 years commencing in 2020. It is worth noting that the Local Plan requirement was introduced in 2004 and Wirral's first Local Plan was produced in 2012 but never adopted.</p> <p>In 2016 the Council prepared a "Strategic Housing Land Availability Assessment Update" and a very limited public consultation process was undertaken in 2017 to which local residents responded, highlighting specifically the many supported reasons why development should not take place in the areas west of Wirral Way to the coastline.</p> <p>Due to significant delays by the Council in not preparing a Local Plan for submission to the Government re Housing needs, supply and deliverability, the Government, after many warnings, stepped in and stated that Wirral must build an average of 803 houses per year for the next 15 years i.e. approx. 12,000 house in total at an average of 4,000 every 5 years. This covered social housing, affordable housing and other housing. In fact, the figure of 12,000 was less than the Council's own projections.</p> <p>Based on the above figures Councillor & Cabinet Member - Housing & Planning (and Deputy Leader of the Council). said: "The Government have set Wirral a target, which means we must make enough land available to allow for 12,000 new homes to be built in Wirral by 2035. We know, and so do Government ministers, that we do not have enough brownfield or urban land to enable housebuilding of this scale." This is very important because it demonstrates that this Council has made up its mind to build on Green Belt and subsequently puts misleading and erroneous figures to the public knowingly, in order to justify their decision to develop on Green Belt.</p> <p>In looking at the figures and shortfalls, etc., it is sometimes difficult to assess the veracity of the figures but a common figure put forward by the Council is that there is a basic requirement for an additional 4,990 home: beyond what is available. Furthermore, the "National Planning Policy Framework" (NPPF2) states that a buffer of 20% needs to be considered for prior years' under-delivery. Wirral Council misinterpreted NPPF2 and added 20% of 12,000 = 2,400 and then added this to the 4,990 alleged shortfall thereby claiming there was a housing shortfall of 7,390. In essence, this was incorrect and the shortfall should have remained at 4990 The shortfall of 4,990 was after the Council's statement that Wirral Waters' allowance was 1,100 homes, whereas the correct figure for Wirral Waters was circa 6,450. Furthermore, the Council is understood to have between 4,500 and 5,000 vacant/empty houses, for whatever reason, which they have excluded from the figures. In other words, knowing that these figures were available why did they either exclude or severely diminish the numbers knowingly. If they had included these figures it would more than demonstrate that there was absolutely no requirement to build on Green Belt. The above comments have been made on the basis of the old figures. However, the Government has now decreed that only 500 houses have to be built each year over the next 15 years. Thus, a total of only 7,500 are needed. This further consolidates the view that under no circumstances should any development be considered on Green Belt and the existing boundaries should be maintained and endure beyond the 15 year plan.</p> <p>The 500 still has to be verified beyond doubt and the Council has written to the Government in order to receive unequivocal confirmation. With such significant changes to the core figures it would seem that the Council should issue corrected figures, and extend the consultation period, or abandon this consultation and issue a new period when they have considered the new figures, which by definition would require a complete review of their current stance on Green Belt. When this issue was raised with Director of Planning, it is understood that he said there would be no amendment to the current arrangements and the principles remain the same and it just gives the Council more options. Amazing!! In addition to the revised figures that are urgently required the Council has failed to publish the "Strategic Housing Land Availability Assessment (SHLAA), which is one of the most important documents in the whole process of producing the Core Strategy Local Plan. Two further key documents have also failed to be published, namely, "Broad Spatial Option Revised Assessment Report" and "Development Viability Baseline Report".</p> <p>It is difficult to see how this consultation process is valid bearing in mind the above factors, let alone other issues discussed later in these notes.</p> <p>National Planning Policy Framework (NPPF2) NPPF2 is the revised version of National Guidance and replaces the former Framework issued in 2012. Para 136 states "Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified...." Furthermore, para 137 states, "Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting identified need for development." Para 143 states "Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances." In addition, within the 5 purposes, including para 136 above, NPPF2 sets out the following:</p> <ul style="list-style-type: none"> i. Check the unrestricted sprawl of large built-up areas ii Assist in safeguarding the countryside from encroachment iii Assist in urban regeneration by encouraging the recycling of derelict and other urban land <p>However, para 145 states "A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions are e) limited infilling in villages. In addition, the Council in its Green Belt Review Methodology effectively states that it complies with NPPF2. Indeed, it also states that the Council will focus on not reducing the separation between settlements. However, it also introduces a statement, which they obviously perceive as a way of circumventing Green Belt hurdles, and complying with para 145 above, which states "Identify opportunities for re-development and infill (not just release).</p> <p>The farmland areas from Wirral Way down to the coast have never been regarded as infill villages and as mentioned above merely seems to represent a mechanism for allowing development at</p>

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	<p>some time in the future for development to take place. Such tactics have been used before by other Councils but the local inspector has deemed them not to comprise a village and the scheme would not involve infill development.</p> <p>Within the document entitled INITIAL GREEN BELT REVIEW- BACKGROUND REPORT - SEPTEMBER 2018 Para 6.4 states "Land to the west of the Wirral Way has not been included, because of the role of the Wirral Way in defining a clear physical edge to the existing urban area and the constraints associated with the national and international designation of the Dee coastline". This would imply that the areas were safe from development bearing in mind all the constraints. However, tucked away in Appendix 16 the Council have re-designated certain areas as infill villages, including the areas west of Wirral Way. This is not transparent or open communication.</p> <p>Infill Villages & the environment</p> <p>The position regarding infill villages is unclear and, as mentioned, somewhat hidden at Appendix 16. But in addition to Appendix 16 there are also references to the sites in Table 2, pages 17 & 18, Appendices 3, 4, 5, 6, 7, 8 (Map), 9 which also gives site category, 10, 11, 12, 13, 14 (maps for further investigation) and 16. In other words a massive amount of detail which in some instances is not readily digestible. Making matters worse for the public is the fact that the criteria for assessment of such land has not been released in time to be properly considered before the cut-off date for responses to the latest consultation. Land on both sides of Riverbank Road is prime agricultural land that does not currently have buildings round, or form part of any local village development. They are adjacent to the Wirral Way and other open agricultural land, so to develop would have a huge detrimental effect on the local environment. The Council has a legal duty to protect land adjacent to the Dee Estuary SSSI/Ramsar site. The new plan needs to consider wildlife corridors, preservation of protected species, biodiversity, scientific and recreational benefit. Locally, we have offsite roosting, breeding and feeding of a range of wetland and sea birds. In terms of wildlife corridors they are essential for the preservation of protected species such as badgers, birds of prey, voles, foxes, hedgehogs, harvest mice, curlews and shelducks, amongst others. The Council tries to justify the status of infill villages by stating that parcels of land are pre-developed. If we take Riverbank Road, that parcel of land between Seabank Road and Riverbank Road is described as being developed on 3 sides. Ignoring the Seabank side there is one small bungalow on the section that runs from Davenport to Riverbank and 4 semi-detached houses, built at the end of the 19th century. The area taken up by these 8 properties plus the Welsh Water storm tank, is approx. 15% of the total farmland area. On the other side of Riverbank going towards Parkgate 2 sides have no housing at all, one side is adjacent to the Wirral Way with no properties and towards the coast the final side has one dwelling. The area of farmland on Riverbank Road going towards Parkgate is approx. the same area as the houses going down to the Dee coastline. Current housing consists of 15 dwellings. Within the document entitled "Summary of Initial Green Belt Assessment - September 2018, on page 185 of 194 it states that this area could potentially provide an additional capacity of up to 45 dwellings. This would triple the number of houses and would completely destroy the Green Belt. This could not possibly be described as infill. Interestingly, by making such a statement the Council are pre-judging the situation and begs the question have they been talking to developers. Development in this area would be expensive executive style private housing of a similar nature to that already being developed in Heswall. These are then sold at a great profit by developers to people who already have the means to purchase other available property in Heswall. There is no possibility of joining this area to another, without causing a catastrophic effect on the environment and most importantly there is no need for development in this area. The land west of Wirral Way is only included because it has been offered to the Council, but to develop it would be a direct breach of Wirral Council's commitment to protect such areas, unless exceptional circumstances apply. There are no exceptional circumstances applicable to this area. It is clear that Wirral Council do not consider this land a requirement to satisfy the immediate call for property units. To allow development of green belt without identifying exceptional circumstances, via another route such as infill villages would breach current planning law and would be outside the power of Wirral Council, as benefit is only afforded to the developer, whilst simultaneously having a detrimental effect on the land, environment, wildlife and thousands of people who use this area for scientific investigation, health and leisure activities.</p> <p>Furthermore, one of the major cornerstones of land designation is to have clear separation of settlement areas. Heswall urban area is designated as Settlement area 7 whereas the area west of Wirral Way is designated as Settlement area 8. If development took place within the locality of Lower Heswall within Settlement area 8, it would completely destroy any separation and the land would simply become part of the Heswall urban area. Hardly an infill village. Quite clearly, such development would have a devastating impact on the character, appearance, spatial and visual views of the area in addition to the impact on wildlife, the environment, International, European and National constraints.</p> <p>Coastal Zone</p> <p>The Principles for the Coastal Policy state "preserving and enhancing the character of the coast, in particular, its national and international importance for nature conservation...." The parcel areas west of Wirral way are all located within the Coastal Zone. Furthermore, development will be permitted within the Developed Coastal Zone subject to the following criteria: the development requires a coastal location, unless the applicant can demonstrate that there is no alternative sites outside the Coastal Zone capable of accommodating the proposed development." The policy also states that "Protection of landscape quality particularly on the undeveloped coastline is thus of considerable importance." Why does it appear that the Council is abandoning such fundamental principles? Agriculture: In considering proposals for development on agricultural land the local planning authority will seek to prevent: the loss of Wirral's best and most versatile agricultural land ii the severance or fragmentation of a farm holding. In addition, the Government is now placing greater emphasis on preserving agricultural land and in particular regarding such a principle, post Brexit, as essential. It is far better to have locally produced foodstuffs, selling locally with the avoidance of transport affecting the environment, etc.</p> <p>Infrastructure</p> <p>It is difficult to assess the damage to the local infrastructure if development was allowed in the areas west of Wirral Way. There are only 2 ways out of Lower Heswall, up Station Road and Wittering</p>

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	<p>Lane. Station Road is relatively narrow and comes to a blind corner when it meets Village Road. Increased traffic would not only have significant pollution implications, but could be a major accident area in waiting. Coming down Station Road to the junction with Davenport and Riverbank, which at that point are part of Wirral Way, the public signs show illustrations of horses, pedestrians, cycles, etc., used by many such is the popularity of this part of the Wirral. It would be extremely dangerous, specifically at the almost 90 degree curve in the road by the entrance sign, as cars are forced to the wrong side of the road going towards the coast. Similarly, going up to Heswall many pedestrians and cyclists are on the road due to the narrow pathways at this juncture</p> <p>Riverbank Road, within the fields, are still subject to flooding due to run off from Heswall. Additional housing would cause a significant worsening of this position. It is also understood that severe drainage problems arise in Seabank Road towards the coastline. Further down by Wittering Lane there are also areas of local flooding Locals in each area will be able to expand on their specific area, as indeed they will about other local issues</p> <p>Then, think of how the roads would be constructed to enable safe passage out of the area, plus pavements, drainage, communications, etc. Then consider schooling and doctors.</p> <p>If you stand at the corner of Riverbank next to the official sign designated Wirral Way and look towards the coast there are magnificent views over the fields and into Wales. Similar views would also be evident along the other fields towards Hoylake. This would be lost forever if development took place. It may also be worthwhile perusing the deeds of your property to ascertain whether there are any covenants in place which preclude further development on your land or in your locality.</p> <p>Re-generation of Urban areas and brownfield sites</p> <p>Although one of the main purposes of the Local Plan is to re-generate urban land by encouraging the recycling of derelict and other urban land, there seems to be a reluctance of the Council to put pressure on developers and builders to pursue this policy. From a developer or builder's point of view this is understandable insofar as there is much more profit by building on Green Belt. However, the Council is failing in its duty if it does not pursue this policy vigorously. It needs to build up a relationship with developers and builders in order to prioritise what is needed for the community as a whole. Their relationship with Peel Holdings is an example of why some matters are not proceeding as they should. They need to prioritise residents' wishes and not those of the developers and builders. I am sure that residents in some of the deprived areas would much rather have their communities upgraded than downgrading areas within the Green Belt.</p>
DOR00784	<p>Regarding the present need for a local plan, I trust that encroachment on the areas of green belt is resisted and hard questions asked as to the real quantity and quality of existing areas within the brownfield sites.</p> <p>I think that encroaching on green belt land is trying to take the line of least resistance from a developer's point of view rather than making them work a little harder to find practical and cost effective solutions within what is already available.</p>
DOR00785	<p>I am amazed and disgusted that Wirral council could even think of building the number of properties intended over coming years. Wirral is a no through route and to think the number of cars etc. it will generate is beyond belief. Most of the roads now aren't in good repair. Are there plans for more doctors surgeries, hospitals, Arrowe Park Hospital is at breaking point now, and also what about Landican there is a two to three week wait now for cremations with more people sadly there are going to be more deaths.. Public transport is not wonderful on Wirral and Barnston Road and Storeton Lane are now without a bus service. Are there plans to build new schools and nurseries.</p> <p>If over one thousand houses are built that will easily generate at least two thousand more cars in this day and age. The roads are extremely busy now, motorists are going to be sitting in traffic jams on a regular basis. What happened to good old common-sense?</p>
DOR00786	<p>Housing is a vital part of life on The Wirral, but so too is the environment. If we carry on building without attention to the infrastructure to support the residents the area will fall into decline. For the Council to sell off the green belt for immediate profit is a very short term solution, leaving the region with a shortage of public transport, an overstretched NHS system and denying young people freedom of public outdoor facilities. What is needed is affordable housing and if Peel's Wirral Waters scheme is able to help with the regeneration of the Birkenhead dock areas, this plan must be considered. I have also heard that the population of the Wirral is not increasing as quickly as other areas in the country, so surely it is up to our Council to prove to the Government that 'one size' does not necessarily fit all and that with careful planning and management we can keep The Wirral a place fit for the future.</p>
DOR00787	<p>I'm writing to oppose plans to build on the Wirral Green Belt, in particular the area by Lever Causeway and Storeton Woods.</p> <p>There is plenty of brownfield sites available in the Wirral such as the huge unused docklands area in Wallasey that would benefit from housing.</p> <p>Building on the Green Belt can never be undone and would cause irreparable damage to our green areas which are enjoyed and treasured by local residents.</p> <p>I ask that you please consider using brownfield sites first.</p>

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DOR00788	<p>Part 1 - I trust the above proposal will give due consideration to the total lack of adequate access and egress to support any increase in housing stock in this area. Pipers Lane is already working at maximum capacity or more. The lane is just over one mile in length 80% of which is single track with no pavements, the last 30% is a cul de sac. There are other consideration due to the access of the Wirral Way at the end of Pipers Lane. Drivers have to contend with walkers, walkers with dogs, cyclists, horse riders sometimes in groups plus dustbins left in the roadway for up to 24 hours twice a week and parked cars.</p> <p>Driving in Pipers Lane has already become a nightmare and is the worst part of any journey. Any timed commitments e.g. Hospital appointments, work commitments etc require setting off at least 10-15 minutes earlier to accommodate holdups in the lane.</p> <p>Part 2 - The fields in question support a vast amount of wildlife and there is still evidence of badgers in the area.</p> <p>Part 3 - If the brown field sites held by Peele holdings can adequately accommodate the land required for the council's quota for new affordable housing by 2035 but are reluctant to use the land themselves, then the council should compulsory purchase the land. This would provide affordable housing of the right type and in the right location for employment.</p>
DOR00789	<p>Thinks residential development would be good idea, but a number of points would need to be addressed:</p> <ol style="list-style-type: none"> 1. Parking problems could arise on street where there is a lack of pavements for pedestrians. 2. The old Victorian sewage system need to be replaced in consultation with experts. 3. Egerton Park is an un-adopted road where each household pays £60 per annum. Can Council adopt and introduce lower speed limit. 4. Existing lighting is not good enough and many entrances are concealed; will extra lighting be provided.
DOR00790	<p>An absolutely appalling idea, we work hard and want to enjoy all that our doorstep has to offer to keep us fit, healthy and living the reason we chose to live in Bebington.</p> <p>Why not use the land in other local urban areas to build on there? There is sufficient land there already.</p> <p>Population projections don't justify 12,000 houses!</p> <p>Lever Causeway is an open space that provides an area of relaxation and exercise for many, many local residents.</p> <p>The visual impact would be devastating to the remaining green belt.</p> <p>Where would the building end? Urban sprawl is not what is needed. Regeneration of other local areas would be much more welcome.</p> <p>Traffic congestion is already an issue at peak times.</p> <p>The Mountwood Conservation Area would suffer massive devastation of its Green Belt.</p> <p>Take time to reconsider alternative options.</p>
DOR00791	<p>Having lived on Wirral all my life, I have seen considerable development, both residential and commercial. Clearly, post war, it was both inevitable and necessary to re-build what had been destroyed in the war but also to build for a new future. Sadly, some of the residential developments in the 50's and 60's replaced old slums with what turned out to be new slums. It is imperative, therefore, that great care is taken regards the quality and quantity of re-development: building communities not simply dwellings.</p> <p>I am particularly concerned at the present time by the prospect of proposals to use a considerably area of 'green belt.' for residential development. Furthermore, I am not convinced that the volume of new build properties stated is accurate, but greatly over-stated. I urge you, therefore, to review the number of properties required annually over the next 10 years, and the area of 'brown field' sites available and properties where planning permission has been granted but as yet, not acted upon. (We don't want land banks, do we?) I also understand that you have only assumed a much smaller volume of units than proposed by Peel Holdings in its Birkenhead Dock development. Why?</p> <p>Another area to explore is the large number vacant of commercial and industrial premises which may be converted into residential premises. Housing Associations would, I'm sure, would be the ideal agents to implement such projects, especially for much needed social housing.</p> <p>Only when these avenues are completed exhausted, should we contemplate encroaching on our valuable 'green belt.'</p>
DOR00792	<p>I note that the Council is considering, as an option, using Protected Open Space, as set out in its Playing Pitch Strategy to address the future housing need. It would appear that SCHLAA 3037 is included in the site proposals identified on the Borough-wide map as proposed housing land.</p> <p>I am concerned that the "Detailed Background Documents" for the assessment were not available for public viewing. I am therefore unclear</p> <ol style="list-style-type: none"> a) Which Category SHLAA 3037 falls into (this is also not indicated on the interactive map) b) How the cumulative scoring has been undertaken which leads to the categorisation of the site. <p>I also note the following documents were not available to inform the consultation</p> <ul style="list-style-type: none"> • Broad Spatial Options Revised Assessment Report • Development Viability Baseline Report April 2018 <p>I note from the Wirral Playing Pitch Strategy documents, with specific reference to Upton Cricket Club SHLAA 3037 (Site ID 78) :</p> <ul style="list-style-type: none"> • The pitches are of Good Quality with both meeting the Performance Quality Standard

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	<ul style="list-style-type: none"> • Training provision is Good • Upton Cricket Club has the 2nd highest number of senior teams in Wirral and 3rd highest number of junior teams including girls as team members. • One pitch is currently played to capacity whilst the second pitch is played more than capacity. This use does not impact on the Performance Quality Standard of Good. • The Playing Pitch Strategy Assessment Report identified that there was no spare pitch capacity in Analysis Area 5 which covers Upton. The Playing Pitch Strategy identifies a shortfall of 0.5 pitches across the area to meet current and future need. <p>You will be aware that paragraph 96 of the revised National Planning Policy Framework (July 2018) requires local authorities to ensure “access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities”. Furthermore paragraph 97 a) states that “Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements. I understand that the Playing Pitch Strategy of 2016 fulfils the requirement for assessment and the findings for SHLAA 3037 clearly identify that the land is not surplus to requirement, that the good quality pitch provision is already at capacity and that the Cricket Club demonstrates it serves the needs of the local community by its second highest team membership in Wirral. I am pleased to see that the recommendations of the Playing Pitch Strategy (PPS) and its Action Plan & Strategy have been approved by the Cabinet Member for Housing and Community Safety and adopted by Wirral Council as a material consideration in planning matters.</p> <p>Aim 1 of the PPS is to “protect the existing supply of outdoor sports facilities where it is needed for meeting current and future needs”. For cricket, the recommendations of</p> <ul style="list-style-type: none"> • Existing quantity of cricket pitches to be protected • Ensure tenure remains secure for all clubs are appropriate when considering SHLAA 3037 . <p>Inclusion of Upton Cricket Club within the sites for Strategic Housing Land Availability Assessment is contrary to the Aims and Recommendations of the PSS because</p> <ul style="list-style-type: none"> • Its inclusion makes it available for consideration for housing and thereby removes the existing quantity of cricket pitches from protection. • Its inclusion provides uncertainty over the tenure thereby removing security for the club. <p>Based on the above I request that as part of this consultation the site at Upton Cricket Club (SHLAA 3037) is removed from Wirral Council’s Strategic Housing Land Availability Assessment because its inclusion is contrary to Wirral’s adopted Playing Pitch Strategy and also paragraphs 96 and 97 of the National Planning Policy Framework. Based on the revised SHLAA Methodology it should be identified as Category 4.</p> <p>As mentioned earlier the Strategic Housing Land Availability Assessment documents were not made available on the consultation website so I am unsure as to the existing scoring and categorisation for SHLAA 3037. A colleague of mine has given the scoring consideration based on the parameters set out in the SHLAA Methodology so I can submit the following scoring and categorisation notwithstanding the request to have the site removed from the SHLAA.</p> <p>Given this assessment the SHLAA 3037 should be categorised as a minimum of Category 3 because it meets the following scoring criteria as set out in the SHLAA Methodology: [Suitability, availability & achievability scoring table provided]</p>
DOR00793	<p>We would like to lodge our extreme objection to any proposed development of the agricultural land between Parkwest, Seabank and Riverside. This would not only be a sorry loss to this valuable farm land but the single exit route ,Station Road and the narrow Lower Village roads are already congested enough without any additional traffic. Local schools are already oversubscribed , valuable wildlife would suffer, drainage and sewers which are already a problem wouldn't be able to cope with additional load.</p> <p>These are just a few of many reasons why any developments in this area would be totally detrimental in this location.</p>
DOR00794	<p>Wirral Local Plan – Development Options Review</p> <p>Thank you for seeking the views of United Utilities as part of the Development Plan process. United Utilities wishes to build a strong partnership with all Local Planning Authorities (LPAs) to aid sustainable development and growth within its area of operation. We aim to proactively identify future development needs and share our information. This helps:</p> <ul style="list-style-type: none"> - ensure a strong connection between development and infrastructure planning; - deliver sound planning strategies; and - inform our future infrastructure investment submissions for determination by our regulator. <p>When preparing the Local Plan and future policies, we can most appropriately manage the impact of development on our infrastructure if development is identified in locations where infrastructure is available with existing capacity. It may be necessary to co-ordinate the delivery of development with the delivery of infrastructure in some circumstances.</p> <p>General Comments</p> <p>United Utilities wishes to highlight that we will seek to work closely with the Council during the Local Plan process to develop a coordinated approach for delivering sustainable growth in sustainable locations. New development should be focused in sustainable locations which are accessible to local services and infrastructure. United Utilities will continue to work with the Council to identify any infrastructure issues and appropriate resolutions throughout the development of the Local Plan.</p>

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	<p>We wish to highlight our free pre-application service for applicants to discuss and agree drainage strategies and water supply requirements. We cannot stress highly enough the importance of contacting us as early as possible.</p> <p>Infrastructure Provision</p> <p>The full detail of the drainage proposals or the water supply requirements for new development proposals are not yet known at this early stage. As a result it is important that we highlight that in the absence of such detail, we cannot fully conclude the impact on our infrastructure over a number of five year investment periods before more detail becomes available. It may be necessary to co-ordinate the timing for the delivery of development with the timing for delivery of infrastructure.</p> <p>Many of the rural areas in the borough will be supported by infrastructure which is proportionate to its rural location. Therefore United Utilities wishes to highlight that disproportionate growth in any settlement has the potential to place a strain on existing water and wastewater infrastructure.</p> <p>Although the sites identified for potential Green Belt release are close to existing infrastructure assets, they are located on the fringe/limits of the existing water supply and/or sewerage infrastructure networks. The network in these areas generally are of size that reflect their greenfield location. The current infrastructure may have limited capacity to support the planned growth. Providing a co-ordinated approach to infrastructure by collaborating with United Utilities will result in providing assets required to support the planned growth. Any growth needs to be carefully planned to ensure new infrastructure provision does not cause any unexpected delays to housing delivery.</p> <p>Once more information is available with respect to specific development sites, which is often only at the planning application stage, we will be able to better understand the potential impacts of development on infrastructure and, as a result, it may be necessary to coordinate the delivery of development with the timing for delivery of infrastructure improvements. We recommend that you include a development management policy in your draft plan to this effect.</p> <p>‘Once more details are known on development sites, for example, the approach to surface water management and proposed connection points to the foul sewer network, it may be necessary to coordinate the delivery of development with timing for the delivery of infrastructure improvements.</p> <p>At the larger development sites, it will be necessary to ensure that the delivery of development is guided by strategies for infrastructure which ensure coordination between phases of development over lengthy time periods and by numerous developers.’</p> <p>With regards the growth in all settlements, UU would encourage information on anticipated delivery rates as soon as it becomes available. We would welcome housing trajectory once this is available.</p> <p>Site specific comments</p> <p>As mentioned above, United Utilities are happy to engage in early dialogue with the Local Planning Authority to highlight the location of our network. For the purpose of this consultation, we wish to make comments with respect to the following sites:</p> <ul style="list-style-type: none"> • SP001 • SP013 • SP064E • SP062 <p>United Utilities has various significant wastewater infrastructure passing through the above sites. All UU assets will need to be afforded due regard in the master planning process and they may impact on housing numbers and deliverability due to their location within the site. SP001 has additional constraints that could further affect the developable area.</p> <p>We would strongly advise that the Local Planning Authority directs any future developer(s) to contact us at their earliest convenience, ideally before any land transactions and certainly prior to any application to explore options for addressing this as early as possible.</p> <p>Utility Assets</p> <p>United Utilities wishes to highlight that it owns assets which are currently situated in the Green Belt / Open Countryside on the current proposals map. Upgrades to these assets may be required in the future, and it is important to ensure that any required upgrades and expansions to these sites can be made in order for us to meet the infrastructure requirements of proposed future development in the borough.</p> <p>Potential Green Belt Development</p> <p>The council will be aware through previous correspondence that some of the potential Green Belt sites contain infrastructure that potentially have limited supporting assets. This includes both water and wastewater network. We would urge you to strongly consider what is mentioned earlier in this response that any growth needs to be carefully planned to ensure new infrastructure provision does not cause any unexpected delays to delivery.</p> <p>We emphasise that at this stage there is very little detail on the sites which makes any assessment of the potential impact on the public sewerage system difficult. We would like to stress the importance of the site specific policies to establish a requirement for developers to use specific alternatives to the public sewer for the discharge of surface water. Such alternatives include the local watercourses/land drains, which are preferable to the discharge of the public combined sewer for the discharge of surface water. There are such options within the allocations in this area. There will</p>

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	<p>be an expectation for applicants to submit clear evidence demonstrating why alternative options are not available if they wish to discharge to a combined sewer. Early contact from developers with United Utilities is required as drainage options will need to be discussed. An overall, holistic approach to drainage, between land owners and development allocations will be required to ensure the most preferable outcome to the disposal of foul and surface water is achieved. United Utilities would like to discuss these allocations with Wirral Council at the earliest convenience, to outline our preferences for options regarding preferred drainage options and a potential phasing policy in relation to these allocations.</p> <p>Large Sites in Multiple Ownership United Utilities wishes to highlight that it has concerns regarding any large sites which are in multiple ownership. The experience of United Utilities is that where allocations are large and in multiple ownership, the achievement of sustainable development can be compromised by developers/applicants working independently. This can lead to issues between interconnecting infrastructure between phases of development. We would urge Wirral Council to use their position to influence a legally binding strategy which seeks to secure a co-ordinated approach to infrastructure alongside the delivery of development for the Local Plan. We believe that raising this point at this early stage is in the best interest of achieving challenging housing delivery targets from allocated sites in the most sustainable and co-ordinated manner.</p> <p>We would encourage a pro-active approach to sustainable drainage to try and ensure communication between phases so there is sufficient capacity to serve the entire allocation area and not just one phase. Any drainage in early phases of the development should have regard to future interconnecting development phases. Planning applications for developments on allocated sites within the Local Plan will then be expected to demonstrate how the drainage proposal for that particular development site relates to the holistic drainage strategy as part of the wider development. We believe that raising this point at this early stage in the preparation of the development is in the best interest of achieving the ambitions of the Local Plan in the most sustainable and co-ordinated manner. United Utilities would be disappointed to find any missed opportunities to discharge surface water to a waterbody due to land owner disputes. This is an important matter for you to consider at this early stage of the Local Plan process.</p> <p>Surface Water Drainage and Potential Impact on Public Sewerage System We believe it would be more appropriate to split the issues of flood risk and surface water management into two policies. We believe this approach will appropriately embed the intentions of national policy with respect to meeting the requirements of the surface water hierarchy as reference in the NPPG. We would wish for any Local Plan policy to reflect national policy with respect to meeting the requirements of the hierarchy and encourage the inclusion of genuine sustainable drainage systems. It is our view that a separate planning policy would set out a clear process in relation to Surface Water Management, creating an approach to drainage for all new development, rather than applications within certain criteria.</p> <p>United Utilities cannot emphasise enough the importance of applying the surface water hierarchy in an era when the impacts of climate change are ever more present. We would like to highlight the importance of site specific policies to identify opportunities within sites that contain alternatives to the public sewer for the discharge of surface water. Such alternatives include the local watercourses/land drains, which are preferable to the discharge of the public combined sewer for the discharge of surface water. Any site specific policy should make reference to such alternatives. We are keen to note that many of the sites considered for green belt release contain such alternatives, and we would recommend that specific reference is made to the options within each site. These alternatives are preferable to the discharge of the public combined sewer for the discharge of surface water and will strengthen the requirement for the applicant to meet the requirements of the surface water hierarchy. We are happy to open dialogue to help identify these potential areas and would welcome discussions with the Local Authority.</p> <p>One important point to note is that it is critical for early phases of development to provide the sustainable surface water drainage infrastructure to ensure the discharge of surface water for any later interconnecting phases of development. This is critical because of the challenge of early phases that prevent later phases from sustainably discharging to a watercourse. Acquiring the right to discharge surface water to watercourses can inhibit the delivery of sustainable surface water management if not considered carefully in the land transaction process, i.e. it is the landowner of the watercourse that owns the right to discharge. The need to ensure discharge rights are acquired as part of the land transaction process and should be a clear expectation of the Local Plan alongside a need for a strategic approach to the delivery of drainage infrastructure which has been outlined earlier</p> <p>Groundwater Source Protection Zones The Environment Agency have defined Source Protection Zones (SPZs) for these groundwater sources, which are used for public drinking water supply purposes. These SPZs signify where there may be a particular risk from polluting activities on or below the land surface. The prevention of pollution to drinking water supplies is critical. Our mapping system shows that some of the potential allocations are within SPZs 1 or 2. The planning department should be aware that early engagement with the Environment Agency and United Utilities is strongly recommended when development is proposed in GWSPZs so effective master planning can be undertaken. Where sites lie within a GWSPZ, it may be necessary that the applicant submits evidence of mitigation as part of their application.</p> <p>The details of GWSPZs can be viewed on the website of the Environment Agency. We would also be happy to provide details if that would be helpful. United Utilities' strong preference is for development to take place outside of any Environment Agency designated SPZ1. [A list of assets provided] [Suggested policy text provided]</p>

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DOR00795	[SAME AS DOR1052]
DOR00796	I object to plans to build on Wirral green belt land very strongly Dibbinsdale Road Bromborough
DOR00797	<p>I wish to register my strong opposition to WBC's plans for Greenbelt development. There is a real and urgent national need for more housing, particularly at entry-level, whether for sale or rental in the public and private sectors, but there appears to be little sense or logic in the WBC plans:</p> <ol style="list-style-type: none"> 1. Is the demand in Wirral so great? Is there a dearth of brownfield sites that necessitates destroying greenbelt? 2. Who will live in the new homes and where will they work? 3. "Brownfield" sites should be fully developed first (and we have great swathes of them in the Wallasey and Birkenhead docklands for example) before any Greenbelt development. These areas are in urgent need of regeneration. 4. Greenbelt development is less likely to be for affordable entry-level housing and will most benefit the land owners and developers to the detriment of the communities whilst doing relatively little to solve the housing shortage. 5. Land requiring remediation cannot simply be left fallow to blight districts indefinitely. The problem should be tackled now when the economic and market forces to do so are strongest.
DOR00798	<p>I would like to raise my objections in the strongest possible terms to the proposed release of green belt land in and around the village of Thornton Hough in anyway shape or form and in particular to land and around Eton, Radley and Oxford Drives. The reasons for my objections are as follow:</p> <ol style="list-style-type: none"> 1. In the summary of Initial Green Belt review it is stated that "The area is part of the Thornton Hough Rural Farmland Landscape Character Area where the quality and condition of the landscape is good and the landscape strategy for the character area is "conserve". This character area is sensitive to any changes which would reduce the local distinctiveness of villages or increase the prominence of roads or urban edges". It is therefore not suitable for release from the green belt, or to be built on. It is imperative that the character of Thornton Hough is retained. 2. The estate on which I live is a small, mature development surrounded on three sides by top grade agricultural land and by the very busy B5136 road on the fourth side. To extend the estate would impact onto areas of the high grade agricultural land and have a detrimental effect on the openness and beauty of the green belt. 3. The development at Wirral Waters, along with Brownfield site availability and the 4000-6000 empty units that exist that could be brought back into habitable use will more than suffice the requirement of 7320 units over the 15 year period. There is no justification for placing a single brick on any land in and around Thornton Hough Village with this alternative housing availability. 4. It is therefore clear now that the dwelling requirements in Wirral for the next 15 years should be downgraded due to the recent figures released by the Office of National Statistics and in light of this new information can the council give an undertaking that green belt boundaries will not be redrawn. 5. The current council plan fails to reflect the true housing needs in the Borough and is fraught with misinformation and inconsistency. Again this renders the need to build anywhere in Thornton Hough Village null and void. 6. The current labour council plan fails to meet the urgent need to regenerate and direct investment into the urban areas away from green belt. 7. Why must so much of our greenbelt land be rendered accessible for building on by our Labour council? Surely they can see that people, like me and my family, would never vote for them if this is what they consider to be the way forward. 8. I urge Wirral Council and Steve Rotherham to significantly increase their efforts to work with Developers such as Peel Holdings (who own Wirral Waters) and to use all the powers that they have at their disposal to ensure that such Brownfield sites are brought forward for development. Leave Thornton Hough out of their plans totally as there is simply no justification to build anywhere in this area. 9. The wildlife in this area has a right to exist in what is already an overcrowded sprawling peninsular, further pressure from concreting over green belt will put unwanted pressure on various species. 10. A Horse sanctuary this is such a necessary plot. There are now over a hundred animals in the sanctuary enjoying the last years of their lives for many. To have them re housed to another part of the country is a sad and disgusting thought. Many would not survive the journey. Who wants that on their conscience? <p>Your current plan and proposal in my view is so unnecessary and at worst vandalism on an industrial scale of our inheritance and that of future generations from all over Wirral. Why should Wirral be a sprawl of concrete, yet many counties so close to us are still enjoying and will be enjoying their wonderful countryside.</p>
DOR00799	<p>We would like to confirm our general objections to the council plans to build on the Green Belt in Wirral. These objections are based upon three major premises.</p> <p>Firstly as stated in local press https://www.liverpoolecho.co.uk/news/liverpool-news/hope-wirral-green-belt-after-15188607 all of the current plans are based upon a significant overestimation of housing needs and therefore the current plans need to be scrapped and worked up again.</p> <p>Secondly there is potential to meet all of the housing needs, even at their 'overestimated worst', using brownfield sites. Indeed, it appears, the council have significantly underestimated, the volume of housing that could be generated by Peel Holdings on the land they own in and around Birkenhead. Again reports in local press would suggest that no Green Belt developments are required at all</p>

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	<p>https://www.liverpoolecho.co.uk/news/liverpool-news/peel-reveals-actual-number-houses-15004956</p> <p>Finally the council do not appear to know what the current actual demand for housing is and how much of this is unmet by current empty properties as was confirmed by their director of housing at the event, hosted by the council in West Kirby, to discuss this topic. Without this information how can they consider making an irreversible decision to destroy its own countryside?</p> <p>Overall we feel that unless the council can address these questions and until they have proved that Green Belt developments are required in the area all such plans for development should be put on hold or, preferably, scrapped completely.</p> <p>We also have one very specific objection we would like to table regarding the council's application of its own policy on Green Belt development (as discussed publically in October 2017). In this document the council state that any development will take into consideration several factors including whether land is agricultural, whether it is of ecological importance, whether it is within a conservation area etc. None of these seem to have been taken into consideration when 'choosing' the areas up for consideration in the current proposals. A specific example of this issue, that we want noted, is the area of Caldý, bordered by Stapledon Woods (parcel SP013). The council state that, instead of following the 'rules' set out in its own document, these current proposals have been decided based on the concept of infilling, that is being bordered on 3 sides by property, however some of the areas it is considering, including SP013 are not. The issue here is that the council are ignoring the Green Belt that they absolutely cannot build on. If the council ignore the fact they cannot build on these woods (and they cannot as stated on their own website) they can use the 'far side of the woods' as their boundary and therefore claim the land is bounded on 3 sides by housing. If they were to be honest, the fixed boundary would be the edge of the woods, adjacent to the agricultural land (just as strong a boundary), and therefore the area under consideration would only be bordered by housing on 2 sides and therefore would not be under consideration by the council's own rules. Furthermore any building on this land would enclose Stapledon woods within housing, destroying the views both of and from the woods. It would also destroy ecologically important wildlife corridors linking 2 parcels of National Trust land and would remove prime arable farm land and would go against almost every guideline that is stated within the council's own document on Green Belt developments.</p>
DOR00800	<p>I wish to object to Wirral Council's plan to build on Green Belt land on Wirral. I believe that Wirral Council should follow a "Brownfield first" policy For the following reasons:</p> <p>There are more than enough Brownfield sites to meet realistic targets without releasing Greenbelt land. This is especially the case now since the Office for National Statistics (ONS) has now released figures indicating a new Wirral target of around 500 rather than 800 homes per year will be needed.</p> <p>The homes needed are meant to be "affordable homes" which are needed more in the "Brownfield sites" in the existing urban areas of east Wirral.</p> <p>Wirral Council should be working more closely with Peel Holdings to allow and assist with the building of affordable homes on "Brownfield sites" at Wirral Waters.</p> <p>Moneys should be diverted from the loan to a Developer to build luxury homes for a Golf Resort on Greenbelt land in Hoylake, to purchase or redevelop Brownfield sites for affordable homes.</p> <p>The Council should not release Greenbelt until all Brownfield has been exhausted and the thousands of empty properties on Wirral have been brought back into use.</p> <p>Greenbelt was meant to stop urban sprawl. To group small settlements, at present within the Greenbelt together into so-called "Settlement Zones" and allow these to merge by allowing Developers to build "non-affordable" homes between them, would still be creating urban sprawl and against the spirit of Greenbelt. Just to justify this by calling these new urban areas "Garden Settlements" is an insult to the principle of Greenbelt.</p> <p>One proposed development area is the land on the north side of Thingwall Road, between Limbo Lane and Arrowse Park. This area is local to me and I am aware of woodland copses here that are homes to bats and owls which have been seen hunting over the fields where planned building may be taking place. There are also a number of ponds on the edges and in the fields where newts and toads are present</p>
DOR00801	<p>Wirral, Core Strategy Local Plan for Future Housing, Consultation</p> <p>I have read the Core Strategy Local Plan - Review of development options by the Deputy Leaders. It emphasises the attraction of the Wirral environment but does not include any suggestions as to how this can be sustained within the strategy. The current strategy is flawed for various reasons. Some brownfield sites have been omitted or underestimated. Notably, the number of homes that could be built at Wirral Waters has been much understated. If the potential is over 13,000 homes, as has been proposed, this is the figure which should be used. For their own reasons, Peel Holdings do not want to reach this target in less than 30 years but this does not mean that the building rate cannot be accelerated to enable a much higher figure to be achieved within 15 years.</p> <p>What concerns me most is the proposed decimation of greenbelt. Swathes of Greenbelt have been identified without any indication of the number of homes that could be built there. How much or how little of this need be used to meet the set target number of homes? Why is the Prenton Golf course been identified for declassification when the site for the suggested Hoylake golf resort has not been identified as suitable for housing? As an aside, it is not the business of the Council to speculate in the hope of earning revenue. It is the business of the Council to provide services for the benefit of residents. The residents already have a golf course. Why build another one? (It was poor judgement to publicise Donald Trump's involvement.)</p> <p>I have already objected to the declassification of the field between Lever Causeway and Stanley Avenue. This has become part of the area shown in map SP030 - North of Lever Causeway. If the whole of the area north-east of the M63 is declassified and subsequently developed, the whole character of the Wirral will be altered and people will be discouraged from coming here to occupy the houses. It will make farming the remaining greenbelt less profitable.</p> <p>I find it strange that my local Councillors are against the strategy which has been put forward by the Council. It looks like a rebellion against the allegedly Government imposed strategy. Whilst the Government policy is open to criticism, it would be better to oppose it in a constructive</p>

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	<p>way. For example, there is a suspicion that not all available Brownfield sites have been identified, perhaps for political reasons.</p> <p>How realistic is the need for the number of homes targeted over the next 15 years? Is it assumed that the present rate of immigration will continue and that the present birth rate will be sustained over that period? I think both are extremely unlikely.</p> <p>Where are the resources for meeting the “imposed” building target? Developers might be persuaded to invest but where will they find the necessary skilled labour, already in short supply? No greenbelt land should be declassified before such resources have been found. I have been collecting recently republished old Ordnance Survey maps originally published around 1900. These demonstrate what can happen with the spread of urban development. I am old enough to remember how much farmland there used to be between Mosley Hill and Garston. I don’t want the same thing to happen in the Wirral. I have been waiting for the Council’s reaction to the Government’s overestimate of future housing needs, as reported in the Liverpool Echo of 23/9/18. Surely, this invalidates the Council’s proposals on which we have been invited to comment.</p> <p>For the moment, I will only add that any developments on the greenbelt surrounding Storeton Village, including any development of land either side of Lever Causeway will destroy the character of the Village. Planning permission for the Storeton Hall site was rightly refused. To build 27 new houses there on top of new accommodation in existing buildings would be “over the top” as that would also destroy the character of Storeton Village. To de-classify the whole of the greenbelt east of the M53 will destroy the rural character of the Wirral and must not be even contemplated. Think of the infra-structure which would be required to support housing there! Mount Road and Lever Causeway might even have to be made into dual carriageways leading to nowhere as the M53 is already congested at times.</p>
DOR00802	<p>Development Options Review - Green Belt</p> <p>As part of this review it is very important that the views of local people are heard and not ignored. I have heard from many of them as a local representative and they do not believe that the proposed sites should be released from the Green belt. I know that many people have written very eloquently on the subject. It would be excessive to take over 20% of our greenbelt for housing and even the largest projection of housing need would not need all of it. I am concerned that the council should work on behalf of all its residents, not developers who want sites.</p> <p>I urge the council to take account of NPPF 2018 which has an emphasis making better use of brownfield sites. Unlike many boroughs, we have plenty of brownfield sites and NPPF (2018) paragraph 117 encourages us to use them. I have been told that there are flaws in the Brownfield register, and some have been missed off.</p> <p>I would point out that as we all want to build a more sustainable approach to transport etc, housing near to the developed travel systems would be preferable. Only today I heard a news item where it was said that large new housing developments led people to have to use their cars to get anywhere. I suggest that’s not what we want for Wirral. Consideration should also be given to numbers of school places and other infrastructure.</p> <p>The recent ONS data should reduce the OAN to a much smaller and more achievable amount. Wirral’s population isn’t projected to grow to any great extent, there is no evidence of a growing population requiring further housing.</p> <p>There are also a number of houses, (the number kept changing during the consultation but definitely in the thousands) which could be brought back into use.</p> <p>Peel Holdings have indicated their readiness to build many more than ~1000 homes in the lifetime of the plan and there are empty homes and brownfield sites available across the Borough. It has been suggested to me that there are more brownfield sites than contained in the register.</p> <p>I have specific comments to oppose the proposed sites which are local to me and the Greasby, Frankby, Irby Ward which I represent.</p> <p>SP001 north of Greasby – loss of this site would see urban sprawl and the increased joining of Greasby with Saughall Massie</p> <p>SP010A East of Rigby Drive – This land is predominantly prime farming land. Loss of this site is strongly opposed within the area. There are concerns around the special archaeological sites within this parcel, and also about flooding caused within Greasby by water which comes from this land – even before it is built upon. This land keeps the settlements distinct and has great value for residents, it needs to be protected for the future. The cops, even if protected would be diminished by built environment all around it.</p> <p>SP019B East of Glenwood Drive this site contributes strongly to the identity of Irby as a distinct village. It acts as greenbelt preventing urban sprawl and is strongly opposed by local people.</p> <p>SP059B land at 41 Thurstaston road, SP059C land at 59 Thurstaston Road, SP059D land at 61 Thurstaston Road all contribute to keeping the land permanently open and constraining sprawl of Irby village.</p> <p>SP059E rear of Irby hall this is a beautiful spot enjoyed by many local people, both walkers and from the village on Thurstaston Road. Public rights of way, ponds etc and wildlife. It is a landscape of value, nearby to site of biological importance in the UDP</p> <p>SP060 South of Thingwall Road Irby if this land was developed then the settlements would be joined, affecting the nature and character of the local area. Urban sprawl which has been so well contained in the area would take prime farm land and bury it under concrete.</p>
DOR00803	<p>I am writing to express my deep unhappiness at the plans being developed for building on the green belt of the Wirral.</p> <p>I live in Storeton, a small village which can trace its roots back to medieval times. The plans under consideration would see the village swamped with new building spreading down from Bebington and submerging the distinct characteristic village in a swathe of new builds. I fully understand the need for new houses and support the basic premise that the government proposes to embark on a program of building. However the plan that has been generated is rushed, inaccurate and takes the 'easy route' by ripping up green belt rather than working with the owners of available brown</p>

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	<p>field land. Surely the basic premise of green belt was to protect against urban sprawl.</p> <p>My understanding is also that the plan - possibly because it has been rushed - does not make a correct accounting of the small scale building already under way. It also contains inaccuracies as to the present designation of the farm land. I am not a 'nimby'. I am against any of the proposals, not merely those affecting Storeton. Once the green belt is developed, there is no going back. No-one ever pulls down a housing estate and hands the land back to farmers. I am against any building between Thingwall and Irby because of the same merging of one town into another that Storeton would face. There is an alternative on brown field and I expect our local councillors and officials to protect our local environment while at the same time allowing houses to be built. I further expect that these houses should be affordable to new buyers starting out on life. Please do your duty to all the residents of the Wirral.</p>
DOR00804	<p>I am writing to express my strong concerns about, and objections to, the suggested plans of developing on Wirral's Green Belt and to suggest money be used in developing the housing and infrastructure that has been left to ruin in many areas across the Wirral.</p> <p>The Wirral is a great place to live, vibrant and diverse, a key part of this is the natural beauty that surrounds us. The Wirral should not be subjected to the catchall plans of the Government. We have plenty of brownfield sites and current housing locations that can be redeveloped, the green belt is an essential area for tourism, local businesses, mental wellbeing, health and wildlife. It also clearly separates distinctive villages.</p> <p>Please do not agree to something that will change the outlook of the Wirral forever, take away its uniqueness and destroy it's natural beauty. Do not be bullied by investors looking to make quick money at the expense of the local community.</p>
DOR00805	<p>I am registering my objection to some of the council green belt proposals. Firstly one of the reasons the green belt was created was to check the unrestricted sprawl of large built up areas this proposal will cancel that ideal. Another is to prevent neighbouring towns merging again this would cancel this as Bromborough and Eastham would be closer together. Again a reason for green belts is given as to preserve the character of historic towns in this case the historic village of Eastham. I accept that there exists a need for additional housing perhaps not to the vast numbers quoted however I suggest the following: Firstly there seems to build more and more industrial units maybe that land would better serve as alternative housing. I think of one area such as in the area of Tulip site which would provide excellent river views. Maybe there exists empty and unused industrial units which occupy lands that may help in the housing shortage, perhaps unused and unoccupied shops may these be considered as conversion to living accommodation. Finally I object to the proposal to build on the car park at the Bromborough shopping area.as this facility already suffers from its close proximity to the Croft shopping area and removing the car park will in my opinion restrict access to a lot of people resulting in a catastrophic down turn in attendance.</p>
DOR00806	<p>The Society is concerned that the Background Document SHLAA April 2018 has not been published. The Society notes that the 2016 ONS Household Projections were published on 20th September. The publication of the new ONS projections and the uncertainty regarding publication of the April 2018 SHLAA seriously impacts on the preparation of responses. The Society is concerned that information in the Council's public briefings and in the visual material on the Local Plan webpages could not be reconciled with the fuller Cabinet Paper Report of July 2018. In the light of the above and the issues which we identify below, we formally request that a new analysis of housing requirement and supply be carried out and subject to consultation.</p> <p>General Considerations - Population Whereas the overall national picture has been one of population growth and the need to accommodate the increased population, the situation in Wirral is very different. Wirral UDP gives the background to population movements in Wirral over the second half of the 20th century. Paras 1.11 refers to the historic development of Wirral and para 1.12 continues "Such development continued apace, reaching its peak in the 1960's, when the population reached 360,000 and unemployment was 2.5%. Since then, there has been a steady if unspectacular decline." Para 1.14 continues "Between 1981 and 1991, the Borough's population fell from 338,954 to 330,795". "This was due primarily to lowering birth rates and net outward migration." This decline continued to 315,000 in 2001 (Wirral Compendium)(some 45,000 less than in the 1960's). Overall the population of Wirral has shown general decline but with some recent stabilisation and recovery to the 2016 midyear estimate of 321,238 - about 39,000 less than the 1960's peak). "</p> <p>"The population was much higher in those earlier times but with a smaller housing stock than that which exists today, when Green Belt land was fixed in a previous UDP/Local Plan of 1983. We recognise that population projections are only one element in assessing the need for homes and that the size of households is also a factor. However, smaller households and changing demographics and lifestyles point to a need for new homes which match these new households. Wherever possible these new homes should be convenient for existing workplaces and services. The overall long term decline of population in Wirral(and the associated growth of land in need of regeneration) remain specific Wirral factors which need to be taken into account in planning for development.</p> <p>Mix of Homes - The comment was made at Briefings that Wirral Waters would not provide the large family houses with gardens. It should be noted that current proposals for Wirral Waters do provide a range of dwellings ranging from dementia units to flats which might well appeal to the young. We would also draw attention to our experience of houses in large gardens in established residential parts of our own area (Heswall) being demolished and developed as flats (no doubt because this provides a better return more responsive to the market). Many of these would be more in keeping retained as housing. The Council should provide a policy in accordance with NPPF para 70 so that as Wirral Waters is developed existing residential areas do not lose their "family homes and gardens" to flats. Original Green Belt and need for Regeneration - The original Wirral Green Belt was "tightly drawn to support regeneration". Although there has been some regeneration there remain very substantial areas of derelict, underused land and even already-cleared land which is urgently in need of regeneration in the older housing areas and at Wirral Waters. When the Mersey Basin Campaign led the clean-up of the Mersey the phrase was coined "Turning towards the Mersey rather than turning our backs to it". Docklands in Liverpool, Salford, Newcastle, Bristol, Cardiff and elsewhere have seen regeneration - it is time that Wirral dockland and other sites also benefitted from major regeneration and that Wirral, as a place to live work and visit benefitted from the opportunities presented.</p>

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	<p>The purposes of the Green Belt. - Paras 5.1 and 5.2 of the “Initial Green Belt Review” state:- 5.1 Appendix 3 shows that all the Green Belt Parcels identified, with the exception of some existing developed areas in the Green Belt, continue to meet one or a number of the Green Belt purposes set out in national policy. Development on any of these sites would therefore, by definition, continue to be harmful to the Green Belt.</p> <p>5.2 This means that individual Parcels and Sites could only be preferred on the basis of having the least harm to the purposes of including land within the Green Belt and any other harm and on the basis of their likely benefit for the promotion of sustainable development, subject to demonstrating the exceptional circumstances to justify changes to Green Belt boundaries required by national policy (NPPF, paragraphs 136 and 137 refer). The Society is making its comments about individual areas at the end of this submission. However, the above paragraphs recognise that the removal of any of the non-developed Green Belt sites would, by definition, continue to be harmful. The Initial Green Belt Review goes on to refer to “any other harm” and “sustainable development” also being considerations related to individual plots. However, in addition to “any other harm” in the context of individual sites there are general “other harm” considerations which apply to Wirral’s Green Belt. The regeneration of previously developed and despoiled areas, in preference to the Green Belt and farmland and land which contributes to the health and wellbeing of the residents must be the most sustainable solution.</p> <p>3.5 Conserving and enhancing the natural environment. - The Council will be expected to comply with the policies in section 15 of the revised NPPF overall. The NPPF states:</p> <p>32. Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements¹⁷. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered). In our view, the evaluation of Environmental Net Gain further weighs in favour of the use of brownfield sites and the economic balance is also shifted in favour of brownfield when the consequences of the need for “Net Environmental Gain” are applied to a specific development.</p> <p>3.6 Wirral as a Place to Live, Work and Visit - The importance of the generality of countryside to Wirral as a place to live work and visit is recognised in Wirral’s Tourism Strategy. The Foreword to the Strategy 2017 - 2020 makes the point that the Wirral Peninsular is a unique place to live, work and visit. It says the strategy will help drive the continued growth (in the tourism sector) whose current value is put at £385m, supporting 5,000 full time jobs. On page 12 of the Strategy it poses the question “What makes Wirral Distinctive and Special?” It answers this by stating: “The motivation to see and explore the Wirral ‘peninsula’ is an overwhelming feature that differentiates it in terms of the broad range of things to do and experiences visitors can access. This is further supported by the exclusive and individual nature of being a peninsula and is distinguished by Wirral’s unique coast, countryside, parks, gardens and towns as well as its independent accommodation, quality restaurants and rich supply of local produce.” The list “Our Core Proposition starts “A peninsula that defines Wirral’s sense of place through its coast and countryside and ability to deliver wide ranging recreational, cultural and leisure experiences.” On page 16, under “The Wirral Plan: a 2020 vision” it states “Wirral’s idyllic scenery, fantastic venues and easy transport links mean it is the perfect place for celebrations and events. New marketing approaches will promote the range of unique and distinctive venues for weddings or boutique experiences, to attract more visitors to Wirral”. The Wirral Tourism Strategy runs to 2020 but if the benefits (including increasing income and work) identified in the Strategy, are to continue to bring results then the Wirral’s countryside, its “Green Belt” must be preserved - the peninsular is not lacking other ways of meeting the need for homes.</p> <p>4 The Need for new Homes - Because the Green Belt Review analysis arises from the projections in the July Cabinet Report and the Consultation Papers and Background Papers we comment firstly on the information in these documents as they stand and subsequently examine the consequences of the ONS 2016 base projections.</p> <p>4.1 Consultation Documents and Background Papers - The Cabinet Report July 2018 states the standard method was used to determine the minimum number of homes (using 2014 based projections and a 2016 start year) and arrived at a figure of 12045 over 15 years, 803 per year. Well qualified statisticians have made representations to the Council challenging these projections and those in previous 2016SHMA and SHELMA figures. In the FAQs on the Council website it is stated that “A number of people have commented on the accuracy of the Government’s population projections which form the basis of the minimum housing figure. The Council will appoint an independent statistician to review any submissions received before any further decisions are taken on the content of the Local Plan.” We note that the Council will undertake this work; we also note that the new 2016 base ONS household projections are a better fit with views of which we are aware.</p> <p>4.2 Empty Properties and Windfall Sites - The Council’s Frequently Asked Questions list now confirms that it can take account of the reuse of empty properties where it can demonstrate that an active programme is in place in accordance with average past performance. The Council has provided for 60 windfall sites per year, just 900 over the 15 years of the Plan. Neither the July 2018 Cabinet Report nor the Annual Monitoring Report 2016 / 17 specifically identify or seem to include “brought back-into-use The inclusion of back-to-use numbers and unregistered completions should substantially reduce, probably eliminate, the backlog from previous years which the Council has to catch up and reduce the buffer it has to provide in years 1 to 5. The Council should also increase to a more realistic level the future 60 per year windfalls it has allowed over the Plan period and include the back-into-use numbers.</p> <p>4.3 20% Buffer - In the Briefing given to residents (reproduced on the Council “Local Plan” web pages) it is stated that 12,000 additional dwellings are needed. It has estimated the 15 year shortfall at 4,990 to which it has then added a further 20% of the 12,000 (i.e. 2400 dwellings) to meet a “National Planning Policy Framework” (NPPF2) requirement arising from previous under-delivery.” As stated above we do not believe that the Council has taken account of the outcome of its policy on dwellings brought-back-into-use and that, taking these into account and taking account of unregistered completions, there is no requirement for a 20% buffer and that the lesser 5% buffer should be applied. Whatever the buffer, the Council has misapplied the NPPF. This requires a buffer</p>

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	<p>to be “moved forward from later in the Plan period”. It does not increase the total number of dwellings to be provided, merely their timing. Furthermore, the number brought forward should be no more than 20% or 5% of the first 5 years not 20% or 5% of the full fifteen year requirement. The shortfall would remain at the unenhanced figure of 4990, subject to reduction to take account of historic and future back-into-use properties and unregistered completions.</p> <p>5 Land for homes - 5.1 Wirral Waters</p> <p>NPPF states: “planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of: specific, deliverable sites for years one to five of the plan period” The Court of Appeal has considered the meaning of the phrase “deliverable sites” in the context of the requirement in paragraph 47 of the National Planning Policy Framework for a five year housing land supply. Giving the leading judgment in <i>St Modwen v SSCLG & ERYC</i> [2017] EWCA Civ 1643, Lord Justice Lindblom said that, to be deliverable in this sense, a site has to be capable of being delivered within five years, but it does not need to be certain or probable that the site actually will be delivered within five years. Sites can be included in the five-year supply if the likelihood of housing being delivered on them within the five year period is no greater than a realistic prospect. The Judge commented that, just because a particular site is capable of being delivered within five years, does not mean that it necessarily will be. He drew a distinction between the identification of deliverable sites for the purpose of showing a supply of specific deliverable sites sufficient to provide five years’ worth of housing against an authority’s requirements and the expected rate of delivery to be reflected in a housing trajectory. He also noted that the NPPF recognises that local planning authorities do not control the housing market. The revised NPPF continues: planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of: specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan. The first 5 years of the Plan refers to the 5 years from 2020. ”</p> <p>Wirral Waters is unique in the UK in having both Enterprise Zone Status and Housing Zone Status - a recognition by Government of the assistance and support the area needs. Peel Holdings has written various letters outlining its commitment to Wirral Waters. On 13th August 2018 the Chairman of Peel wrote to Margaret Greenwood MP (copy attached), He wrote “In March 2018, we announced three major housing projects that will bring over 1000 new homes to the area over the next three years. This is of course only the start of housing delivery.” In a letter to the Leader of the Council dated 10th September the Development Director of Wirral Waters wrote “With the support and cooperation of you, and the Council you lead, we could build up to 6,450 in the next 15 years to reach our ultimate goal of 13,000 homes.” “we are still waiting for you to commit to the Legacy / Wirral Waters One housing project which alone will deliver 500 units. With two more housing projects in the pipeline - those, combined, could deliver circa 1,000 new homes by 2022, and that is just the start.” Wirral Cabinet has now given the “green light” to build 500 new homes (Legacy / Wirral Waters) and other imminent projects are the Peel / Belong specialist care village equivalent to 109 new homes and the Peel / Urban Splash Northbank development comprising 347 homes. It is hardly surprising that development at Wirral Waters, looking as far ahead as the period between 2025 and 2035, is still subject to arrangements for associated investment in infrastructure, environmental improvements and energy and technology infrastructure. Green Belt sites would also need such provisions. However the NPPF is less specific in its requirements for the identification of sites for these later years. The Council should allow for 1100 “deliverable sites” at Wirral Waters in the period to 2025 and a further 5350 “developable sites or broad locations” at Wirral Waters over the remaining Plan Period to 2035 bringing the overall Plan Period contribution from Wirral Waters to 6450.</p> <p>"5.2 Does the July Cabinet 803 dwellings per year projection lead to a shortfall? The Cabinet paper estimates the shortfall as 4794 after allowing for 1100 at Wirral Waters over the plan period but only requiring 160 for the 20% buffer (there is clearly an error here and 160 the figure is inconsistent with that of 2400 given in the briefings). The following corrections should be made to the Cabinet figures: Taking account of non-registered completions and “back-into-use” properties there should be no backlog the total requirement therefore becomes 13369-574=12795. No buffer should be added to the 15 year total as the buffer is just brought forward within the period. The Total Estimated Supply of 7635 should be increased to take account of the total 6450 Wirral Waters Dwellings, total supply becomes 14085. This exceeds the total requirement. Further contributions to supply will arise from “brought-back-into-use” dwellings. It should also be noted that half of the proposed 13,500 capacity of Wirral Waters would remain beyond the Plan period.</p> <p>5.3 Meeting the Need for New Homes using ONS 2016 base Projections</p> <p>The ONS 2016 based projections have now been published and, using the Government Standard Method, the minimum need has been taken as 488 per year (2440 over 5 years, 7320 over 15 years) although interpretations of the application of the standard method the figure could be 6332. Wirral Council’s SHMA completed in May 2016 indicated an OAN of 875 new dwellings per year between 2014 and 2032 The SHELMA study arrived at an OAN of between 737 new dwellings per year based on 2014 household data, uplifted for affordability and a “Growth Scenario”.</p> <p>Submissions have been made challenging the statistical basis of the 2016SHMA and SHELMA figures and offering outcomes in keeping with the use of the 2016 base ONS projections. In our view the 2016 SHMA and SHELMA reports are now superseded and Obsolete. On the basis of 488 dwellings per year and without any uplift for economic growth the total requirement (with no backlog but including a 5% buffer brought forward into the first 5 years from later years) is years 2020 to 2025 ... 2562 + demolitions 250 = 2812</p> <p>2025 to 2030 ... 2379 2629 cumulative 5441</p> <p>2030 to 2035 ... 2379 2629 cumulative 8070</p> <p>Total 7320 + demolitions 750 8070</p> <p>The 2016 Cabinet Report provided the following figures for total estimated</p>

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	<p>supply (without any allowance for Wirral Waters): 2018 to 2023 ... 3334 2023 to 2028 ... 1793 cumulative 2018 to 2028 ... 5127 2028 to 2033 ... 2508 cumulative 2018 to 2033 ... 7635"</p> <p>"There is a mismatch in that the Cabinet Report figures are out of synchronisation with the Plan period. Setting this aside, the greatest shortfall would be 435 at the end of the Plan period. Even the initial 1100 allowance for Wirral Waters would far exceed this deficit. However, future allowance for "back-into-use" properties would reduce the deficit and the need for Wirral Waters even further. It should also be noted that substantial capacity remains at Wirral Waters beyond the Plan period and that, in our view, priority should be given to regeneration projects.</p> <p>5.4 Other Urban sites The Society would draw attention to the already cleared areas in North Birkenhead in the surroundings of Birkenhead North Station - an area with infrastructure and ready access to Merseyrail. We would also underline the need to regenerate areas in the vicinity of Wirral Waters and between Wirral Waters to assist the creation of an attractive new "village" environment. The Port Sunlight River Park has created an attractive environment. The surrounding land should provide good places to live.</p> <p>5.9 Conclusion re the need for Homes The above notes demonstrate that the even a projection of 803 new homes per year could be met with development at Wirral Waters. Using the new 2016 base ONS projections, which we consider to be more realistic, need can almost be met without Wirral Waters. Having said this, we have a preference for development at Wirral Waters and other sites which need regeneration because this would be better for Wirral "as a place to live, work and visit". The Secretary of State (then Sajid Javid) recognised that Wirral is not an area of high housing pressure when he wrote to Wirral Council on 23rd March 2018 about the delay in producing a Local Plan; he wrote "In terms of our intervention criteria your Council has failed to make progress on plan making, the policies for the area are not up to date. This is not an area of high housing pressure"</p> <p>5.10 Economic Growth There have been various references to the need to include a provision for economic growth. As part of their statistical analyses others will be examining this and other issues. We would raise a broader point. Wirral is not lacking in the capacity to meet future needs - either on the basis of the 803 projection or the more realistic ONS16 projection. The danger, as we see it, is that the Council will be judged on housing delivery. This is very different from identifying land to meet needs. Delivery is outside the Council's control and is subject to broad economic changes way beyond national let alone local control. Setting a "growth target" is a hostage to fortune where failure to meet the target would have very serious consequences arising from the revised NPPF. It would be unwise to set too ambitious a target."</p> <p>6 Conclusion The NPPF states 136. "Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans." In our view this new requirement for exceptional circumstances to be "fully justified and evidenced" reaffirms the Government's support for preserving the Green Belt. Para 137 establishes new tests: 137. "Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:</p> <ul style="list-style-type: none"> a) makes as much use as possible of suitable brownfield sites and underutilised land; b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground The Council's Development Review does not meet these tests. There is sufficient land to meet the need for new dwellings in Wirral and we refer back to the Secretary of States' statement that Wirral is not an area of high housing need." The Green Belt boundary should not be <p>"changed 7 Comments on Land in the area of Heswall Ward Heswall is a mainly dormitory area with low local employment opportunities. It is a key town centre but travel outside the town has to be by bus or car as the high frequency Merseyrail which services other parts of Wirral does not currently serve Heswall. Rail travel relies on the less frequent Wrexham to Bidston line with a connection at Bidston. The UDP identifies 3 locations for major highway schemes and two sites, one of which is Heswall , "which exhibit traffic problems in relation to congestion at peak periods and vehicular / pedestrian conflict". The 2012 Proposed Submission Draft Core Strategy Policy CS10 para 8 reads "Monitor and manage traffic flows to promote sustainable transport; and maximise highway efficiency on routes through Heswall Town Centre and towards Birkenhead and the M53 Motorway" The Society is concerned that the Proposed Submission Draft omitted mention of vehicular / pedestrian conflict. In addition we are concerned about growing pollution in the Key Town Centre. These recognised traffic issues will be exacerbated by the potential of development in the surrounding Green Belt areas.</p> <p>7.1 Green Belt Land - 7.2 The Coastal Belt</p>

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	<p>SP099, SP097, SP100, SP101, SP102, SP103, SP105, SP110</p> <p>7.2.1 The Heswall Society welcomes the decision that the Wirral Way should be a high level boundary and that “land to the west of the Wirral Way has not been included (in the list for further investigation) because of the role of the Wirral Way in defining clear physical edge to the existing urban area and the constraints associated with national and international designation of the Dee Coastline.” However, we would like to see an explicit statement linking the designation of this area as Green Belt to the purposes of the Green Belt as defined in the NPPF. Also, although we welcome the recognition of the Wirral Way as a high level boundary it is our view that there should be an undeveloped belt between the Wirral Way and any development to the east of the Wirral Way if its character as a country park is to be maintained - this point will be developed later in consideration of SP058E.</p> <p>7.2.2 It is implicit that the inclusion in Green Belt recognises the importance of the openness of these areas - without openness the importance to the international designation of the Dee Coast would be lost and the importance of the Wirral Way as a country park (opened in 1973 it was the first designated country park in Britain) would be lost. It is implicit that this area needs to be protected from the unrestricted sprawl of built up areas, to assist in safeguarding the countryside from encroachment and to assist in urban regeneration by encouraging the recycling of derelict and other urban land. It particularly serves the requirements in para 141 of NPPF2 that “Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use.” We would like to see the importance of the openness of the coastal strip and the reasons for inclusion in the Green Belt explicitly stated. We would link this recommendation with the Consultation’s reference to infill villages and NPPF para 140 which reads: “If it is necessary to restrict development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.”</p> <p>7.2.3 We appreciate that it is important that all possibilities have been explored before the Local Plan is signed off for examination. However, The Society wishes to express its concern at the possibility that any land between the Wirral Way and the coast might be treated as an infill village and at the possibility of other infill.</p> <p>7.2.4 The Society does not recognise any of the areas listed above, jointly or singly, as villages. They are small enclaves within the Green Belt. The areas have been designated for remaining in the Green Belt because of the strong boundary of the Wirral Way and the constraints on national and international designation of the Dee Coast. As stated above the openness of these areas underpins this designation. It is also crucial to the recreational value of the area.</p> <p>The Davenport Road section of the Wirral Way relies on the openness of the fields to the west to retain its value. The Local Plan should also take into account the proposed Birkenhead to Welsh Border section of the proposed English Coast Path. Having raised the possibility of infill villages we suggest it is imperative that the Local Plan makes clear that these areas are included in Green Belt to protect their openness.</p> <p>7.2.5 We would also refer to NPPF para 170</p> <p>Planning policies and decisions should contribute to and enhance the natural and local environment by: c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate; The area between the Wirral Way and Davenport Road / Wirral Way is defined as “undeveloped Coastal Zone” in the current UDP but this relies, principally, on its Green Belt status for controlling development. Clearly, this area continues to be “undeveloped coast” as defined in the NPPF with NPPF Para 170 giving added recognition and protection.</p> <p>7.2.6 There are also concerns about the limited vehicular access to this area. The Society considers that infill development in the areas identified would be inappropriate.</p> <p>7.2.7 Individual Areas Against the above background we would make the following additional comments about individual sites:</p> <p>SP096 (part) North of Broad Lane - this adjoins and is visible from the Wirral Way and loss of openness would be harmful</p> <p>SP097 South of Broad Lane These sites are a cluster close to the shore and close to the Banks Road access to the shore, their proximity to the shore is an issue in relation to the international designation of the Dee Coast. The openness is also important to the recreational value of the area. The future route of the English Coast Path is also a constraint which needs to be considered.</p> <p>SP099 Park West - The area is tightly developed but well treed. there would not appear to be any opportunities for infill without adverse environmental consequences and harm to the character of the area.</p> <p>SP100 North of Manners Lane - SP101 South of Manners Lane</p> <p>The above two areas of high quality agricultural land are important in maintaining an openness and country aspect to the Davenport Road section of the Wirral Way as well as being important because of the neighbouring international designation. It seems unlikely that development would be possible without adverse environmental harm.</p> <p>SP102 Seabank Road - This area is tightly developed and there would seem to be no opportunities for infill development. There are some gardens which have extended into the fields to the south of Seabank Road and these should not be developed as they contribute to the openness of the Green Belt and Wirral Way; development would also be harmful in terms of the neighbouring international designation and general environmental impact..</p> <p>SP103 (part) and SP104 (part) Riverbank Road This is the least developed of the roads running down from Davenport Road to the shore. The development of the open fields which adjoin Riverbank Road would be harmful to the purposes of including the area in the Green Belt (and the undeveloped coast) by reason of the loss of openness and the constraints associated with the national and international designations of the estuary and NPPF para 170c.</p>

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	<p>SP105 Cottage Drive West is part of a well treed enclave in very close proximity to the internationally designated area and shown as a core biodiversity area. Infill development would be harmful to the character of this area and the core biodiversity.</p> <p>SP110 Wittering Lane is part of an extensive network of recreational routes. We would regard the extension of development to the north of existing dwellings and the infilling between dwellings as harmful to the openness of the Green Belt and to the character of the area.</p> <p>SP090 Gayton Conservation Area</p> <p>This area lies within the Gayton Conservation Area. It is a relatively small area but with a high degree of core biodiversity areas and marked SBI on the Proposals map. It relates to surrounding SBI and core biodiversity areas. What little potential there is for infill of this area would be offset by the potential harm to the biodiversity area.</p> <p>7.3 Sites for Further Investigation</p> <p>SP058C SP058D and SP058E West of Pipers Lane, Heswall</p> <p>This parcel includes land that has historically been host to active badger setts. These were closed under licence, in dubious circumstances, but neglect of at least one field has allowed gorse to grow back. Local people report badger activity in the area. Until a full badger survey is allowed by owners, we have to assume the presence of badgers, and consequently object to zoning for development. The small fields in this wider area have not been adequately surveyed, and may have other wildlife importance. They form a connecting area between the Dee clay cliffs (part SSSI, part IWS), Heswall Fields LWS, the Wirral Way LWS, the Dungeon LWS and wider farmland including Oldfield Farm.</p> <p>The wildlife corridor function of this area is therefore likely to be important. A Society Member reports “Every year shelduck migrate to this area during April and remain until July when they depart with their new hatch. They are ground nesting birds. Numerous mallard and geese live in the ponds and coastland of Wirral’s Deeside. Buzzards, hawks and Kites roost in the Woodland on the Oldfield Ridge, between the Akbar and Pipers Lane, they catch their prey in the gorse and fields on the Deeside Coastal Open Space.”</p> <p>SP058C and D are designated SBIs, core biodiversity areas with linkages to the Wirral Way and, currently, land of Special Landscape Value. The Wirral Landscape Character Assessment states “This landscape character assessment identifies the landscapes in which Areas of Special Landscape Value were located as landscape character areas with strong character which are generally in a good condition. The recommended landscape management strategies for these areas are focused on the conservation of key landscape features to ensure they maintain their current quality.” They lie at an entrance to the Wirral Way and SP058E, which includes ponds and treed areas, is contiguous with the Wirral Way. The loss of these fields would be to the detriment of the recreational value of the Wirral Way. We have a further concern about the impact of development of the strip which separates existing development from the Wirral Way. We have welcomed the identification of the Wirral Way as “high level boundary”, however, if development to the east of the Wirral Way approaches too close to the country park its inherent country park character will be eroded. The View of</p> <p>The Society is that these plots should not be removed from the Green Belt. The Heswall Society would wish to see a protected belt separating the Wirral Way from new development to the East and, in our view, the previously established belt separating development from the Wirral Way should be retained. The Society is also concerned about the traffic impact of more development feeding into the Pipers Lane “ancient highway” (designation confirmed in late 1960s) and the availability of other services in this area. SP071 Land at Chester Road, Gayton Includes recreational land and playing fields (there is a recognised shortfall of youth match sessions (football) which can only met by retaining and adjusting use between pitch types). It also contains a large area of high quality agricultural land. Although having a 73% urban enclosure the area marks the A540 gateway to Wirral as a borough which has green space and which is not completely developed up to its boundary. This would be harmful to the Wirral approaches.</p> <p>SP109 Boathouse Lane, Gayton - a well treed area of land containing large ponds adjoining Boathouse Lane marked as a core biodiversity area. It faces open Cheshire countryside on the opposite side of the lane. An ecological appraisal for a planning application OUT/ 17/01376 conducted in 2018 concluded “the application site has been found to be of moderate ecological value at the local scale, with potential to support a number of legally protected and/or notable species of fauna. The "</p> <p>"development of the site would pose adverse impacts on these species if present; therefore it is recommended that further survey is undertaken". Even if eventual further investigations did not demonstrate adverse impacts on such species the small number of dwellings which would result would not be material and would be insufficient to compensate for the loss of this treed and green area adjoining the public realm.</p> <p>SP062 West of Barnston Village - only the south part of this area lies in Heswall Ward. However the Society would be concerned about the implications of development of SP062 as a whole. It would be a significant extension of urban sprawl. The development of SP062 would reduce the physical separation of Heswall, Pensby, Thingwall and Barnston. The loss of this large area of open land would be harmful to the setting of Heswall. It lies opposite Whitfield Common, providing a visual link between the common and the broader countryside, to the benefit of the common as a local amenity. That part of SP062 which lies within Heswall Ward is High Quality Agricultural Land. The Society would have concerns about the effect of traffic generation on Heswall Centre and the impact on other services and lies far from the “areas of need”. In our view this area of farmland should not be removed from the Green Belt.</p> <p>[Letter from Wirral Waters attached]</p>

DOR REF	RESPONSE
	[Letter from Landowner attached]"
DOR00807	<p>my objections to the potential building on Lever Causeway Green Belt land for the following reasons.</p> <ol style="list-style-type: none"> 1.) There is sufficient land in urban areas to build upon. 2.) The population projection does not warrant for 12,000 houses. 3.) It will spoil the character of the area. 4.) Lever Causeway and it's open spaces provide an area for relaxation and exercise for innumerable local residents as well as wildlife. 5.) Unrivalled views will be destroyed, irreparable damage to its setting. 6.) Increased traffic and major congestion in an already busy area. 7.) Acres of prime agricultural land will be lost which will be needed after Brexit. 8.) Damage to Mountwood Conservation area. 9.) The sites either side of Lever Causeway are huge. Once released from Green Belt, building could extend to Storeton, causing unrestricted sprawl, with historic Storeton and Bebington Merging. 10.) Use the Wirral's already empty 5,000 properties and the already existing space on brownfield sites for 18000 homes. 11.) There is no infrastructure for these buildings, schools, shops, buses. It will be another no man's land.
DOR00808	<p>I wish to raise my strong objections to recently disclosed proposals to "in fill" land in the Lower Heswall area (SP099 - SP104 Inclusive) with housing. The proposed infill plan would nearly double the number of houses in the area affected and have a major impact on the residents already living here. It will put intolerable strain on the local facilities schools, roads, & drainage in particular. There will be no benefit from this development to the local residents, no increased employment opportunities, no improvement of access to facilities (quite the opposite). The location of the proposed development will in no way contribute to the provision of affordable housing as due to its position the homes built will attract a significant premium to their value. It is likely that it will only serve to raise local property prices ever higher.</p> <p>I understand that the council has significant obligations in protecting the natural environment, I am not alone in not understanding why land held by Peel Holdings ostensibly already agreed for development into affordable housing is yet to have any development at all. It is surely perverse to plan to develop on prime green field agricultural land, abutting an internationally important SSI rather than building on land already agreed to be developed. This proposed development will close wildlife corridors and reduce Wirral resident's access to the natural environment. You will be aware that the "Wirral Way" actually runs on Davenport road, the large numbers of pedestrians, cyclists, dog walkers and horse riders using it will be at risk as a significant increase in vehicle traffic here is inevitable with the proposed development.</p> <p>The only people who will benefit from this proposed scheme to build on the greenbelt are the land owners and the developers, this will be at the cost of major degradation of the natural environment for wildlife and the physical environment for the residents of Wirral.</p>

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DOR00809	<p>The release of any green belt land is irrevocable and the creation of additional dwellings must more than compensate for the loss of amenity.</p> <p>I. Housing need – determining the number of dwellings to be built</p> <p>Any forecast is underpinned by a set of assumptions and the final forecast is sensitive to inherent uncertainties in each of the assumptions. In creating the Local Plan, the Council must have sufficient confidence in the forecasts to take the monumental decision to release green belt land.</p> <p>On 20 September 2018, the Office for National Statistics released “Household projections in England: 2016-based”. This states that the number of households in the borough will rise from 142,190 in 2016 to 152,062 in 2041 an increase of 9,871 a significant reduction on the figure that the Council is using as the basis for its Local Plan.</p> <p>Various commentators have produced critiques of the Council’s methodology which add weight to the body of evidence that the housing targets are not sufficiently robust.</p> <p>As well as the total number of dwellings, the housing mix needs to be more carefully thought through.</p> <p>The Land Registry shows that owner occupied house prices in the borough have been essentially static over the past ten years and have therefore fallen in real terms. In other areas of the country where demand outstrips supply, price increases have been dramatic. The same cannot be said in the borough.</p> <p>The ONS report notes that: “We project the majority of household growth over the next 25 years will be because of the rise in the number of households being headed by someone aged 65 years and over. This shows the impact an ageing population is having on household growth.”</p> <p>These two facts demonstrate that building on the green belt without adequate public transport and other facilities will not meet the needs of those with the greatest housing needs.</p> <p>II. The potential supply of housing from brownfield sites</p> <p>At the meeting on 18th September, Mr [council officer] stressed the point about development on Wirral Waters not being proven as viable.</p> <p>There are plenty of examples of dockland regeneration in the country and it is hard to understand why the lessons learned from elsewhere are not being applied to the Wirral Waters scheme to give a high degree of assurance that it is viable.</p> <p>The documents are silent on the use of vacant office and retail space for housing. There is an oversupply of both of these in some areas of the Borough and facilitating housing development in these would solve two issues simultaneously.</p> <p>III. Issues related to the viability and feasibility of sites</p> <p>Mr [council officer] in his presentation made much of the viability of sites. Viability is not an absolute: time, money, effort and energy can be used to transform the viability of a site.</p> <p>If the Council included a proper cost of the loss of utility of Green Belt land in the analysis then I suspect that almost all of the sites earmarked for release would not be viable. The issue here is that this Local Plan process is being conducted late, and in a hurried manner, which does not allow sufficient time for innovation and creative thinking to meet the future housing needs of the Borough.</p> <p>Many of the sites earmarked for release are not well served by public transport. What is the projected impact on the road infrastructure and emissions from motor vehicles both in terms of the both the additional cars and increased congestion on existing roads?</p> <p>What is the Council’s strategy for agreements with developers to ensure that any new infrastructure is funded by the developers and not by the council tax payers?</p> <p>Has the cumulative impact of a number of small developments been factored into the Local Plan?</p> <p>IV. Comments on two specific sites in the review</p> <p>I do not support any release of existing green belt land for development because I believe the real housing need can be accommodated without doing so.</p> <p>My detailed comments are restricted to two specific sites where I have immediate relevant knowledge.</p> <p>SP016 Royal Liverpool Golf Course</p> <p>It is important to preserve this site for the following reasons:</p> <ul style="list-style-type: none"> • The Royal Liverpool Golf Course is known through the world and development on the site would destroy its essential character; • The golf course is essential barrier between the nature reserve, home to the natterjack toad, and the suburban sprawl of Hoylake and West Kirby; and • Development on the course would blur the boundary between Hoylake and West Kirby. <p>SP013 Land west of Column Road</p> <p>It is important to preserve this site for the following reasons:</p> <ul style="list-style-type: none"> • The wood and fields are important for wildlife with geese often to be seen grazing on the fields; • Although there are a small number of houses on the boundary of the site, it is not a “fill in” site bounded by existing housing; and • Building on this site would exacerbate traffic problems on the A540. <p>V. Conflicts of interest</p> <p>The report to Cabinet on 23rd July 2018 states:</p> <p>The final decision on the sites to be included in the Local Plan could also support the delivery of the Council’s Medium Term Financial Strategy and an increase in income through New Homes Bonus,</p>

DOR REF	RESPONSE
	<p>Council Tax and Business Rates.</p> <p>Please can you confirm that there are systems and controls in place to manage conflicts of interest and to 1) allow council officers to carry out their duties and 2) that planning decisions are based solely on the relevant facts and not influenced by the state of the Council's finances.</p> <p>VI. Conclusions</p> <p>In preparing the Local Plan, the Council must meet its statutory obligations whilst having due regard for the views of the Borough's residents, the importance in Government policy attached to the preservation of the green belt and maintaining the character and essence of the part of the Wirral peninsula that the Council is responsible for.</p> <p>The Council must comply with the law, but this is not sufficient to discharge its moral duty to the residents, both current and future of the Borough as the Council is the guardian of the future shape of the Borough. The case has not been fully made for the release of green belt land. The work has been carried out in haste to meet deadlines because the work was not commenced soon enough. This has led to a lack of innovation and creativity in preparing the proposals and, if approved, would set us on course for unimaginative housing built on easy to access green field sites. The impact of local infrastructure is currently unknown, but would more than likely be highly detrimental.</p> <p>Any release of land for development would see super profits accrue to landowners and housebuilders. The loss of utility to the residents of the Borough is clear and undeniable but is incapable of being measured in pure financial terms. This does not mean it should be ignored in a rushed process to meet a legal requirement that the Council has stalled on meeting for several years.</p> <p>A final reminder ...</p> <p>133. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.</p> <p>[ONS Graph included]</p>
DOR00810	[SAME AS DOR00455]
DOR00811	<p>I consider myself extremely lucky to where I do and one of the major reasons for buying our house (only purchased April 2018) was the stunning view and the feeling of truly being in a rural area despite being 5 minutes from Bebington and Barnston. The area around Storeton is a stunning green space and I fear for the future if spaces like this are to be earmarked for development.</p> <p>Building on and around this beautiful area risks merging of Bebington and Storeton and destroying the uniqueness of Storeton as an historic village.</p> <p>Storeton Lane is already congested at peak times, how will the council manage the bottle neck at the Barnston end given the increased traffic.</p> <p>The same applies to the M53 junction at Clatterbridge. Any substantial development will increase traffic to this major M53 junction, again, already congested at busy times.</p> <p>Prime areas of agricultural land would also be lost.</p> <p>The area surrounding Lever Causeway and Storeton woods is popular with horse riders, cyclists, dog walkers, walkers and families and that is because it offers something particularly special and unique to this side of the Wirral. Although you are a stone's throw from a busy motorway you feel as if you are in the middle of the countryside.</p> <p>Added to that there are plenty of Brownfield sites and empty properties that could be considered for development before using this precious green space.</p> <p>Please consider this before handing power to greedy developers who will nothing of spoiling the beautiful and peaceful space that it is.</p>
DOR00812	<p>General</p> <ul style="list-style-type: none"> • The Council has a statutory duty under NPPF2 to protect the Green Belt from development and alteration unless there are exceptional circumstances. The Council has produced no evidence to demonstrate exceptional circumstances, other than the politics of dealing with Government and developers, and lies open to legal challenge as a result. The withholding of key documents, such as the SHLAA report from April 2018, further complicates the Council's legal position, with respect to a full and open consultation. We would request that the Council reconsider its whole approach to the Local Plan and its overzealous acceptance of the future development of the Green Belt. • The Council's willingness to consider development on the Green Belt is derived from major flaws in the supporting calculations. The overestimate of the baseline future housing need on the Wirral over the next 15 years needs to be corrected using the recent ONS numbers. At the same time, the Council needs to correct the gross underestimate of housing potential offered by Wirral Waters, the gross underestimate of the potential re-use of empty properties, and the use of a 20% "buffer", where no such buffer is required by NPPF2. We request that the Council reviews the details of its calculations, and the specific points above, prior to submission of the final Plan. • We would also ask the Council, as our elected representatives, to foster a better and more constructive relationship with both Government and Peel Holdings, and put political differences to one side to do what is really best for the Wirral and its whole population. <p>Impact on the coastal strip</p> <ul style="list-style-type: none"> • The Initial Green Belt Review Background Report (Sept 18) states that all sites west of the Wirral Way are going to be excluded (Paragraph 6.4) to protect the coastal strip. This is a very clear principle, which we wholeheartedly support. The subsequent inclusion of a range of sites in Appendix 16, of that same Report, which ARE to the west (or more accurately the south-west) of the Wirral Way, including Riverbank Road, is a huge flaw in an otherwise logical and consistent approach. We ask the Forward Planning Team to set this right by removing all the sites within the Dee

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	<p>coastal strip, (south-)west of the Wirral Way, from Appendix 16.</p> <ul style="list-style-type: none"> • While the new plan is designed to replace the 2000 UDP, the inclusion of parts of the Wirral coastal strip in the Initial Green Belt Background Report is in complete and direct contradiction with stated core principles laid out in that UDP. Para 20.5 in the UDP's section on "The Coastal Zone" states that "The Council's central aim is the preservation and enhancement of the character of the coast". What has changed to make this no longer the case? The UDP further states that "Protection of landscape quality particularly on the undeveloped coastline is thus of considerable importance." It goes on to state that "the undeveloped coast should not be expected to accommodate new development which could be located inland or in existing developed areas" and that "Not only will this minimise the loss of undeveloped coastline but development here will help to secure wider urban regeneration objectives." Again what has changed to prompt this complete about-face? We would contend that very little if anything has changed, either legally or morally, with respect to the need for the Council to protect the coastal strip. We ask the Forward Planning Team to remove all the sites within the Dee coastal strip, (south-) west of the Wirral Way, from Appendix 16 on this basis. • The Council has a legal duty to protect sites designated for their international importance for nature conservation. In this particular instance, this legal requirement extends to adjacent land, located outside the Dee Estuary SSSI / Ramsar site that may contribute to the support of the species within it, including off-site roosting, breeding and feeding. The coastal strip is a wildlife haven, essential for the preservation of protected species such as badgers, birds of prey, voles, foxes, hedgehogs, harvest mice, and wading birds such as curlews and shelducks, amongst others, being as it is within the European Bird Count protected areas. The location gives extensive biodiversity and significant scientific and recreational benefit. The Council's legal duty to safeguard these areas from development far outweighs any gain to be achieved by including the Riverbank Road sites within the Local Plan. We ask the Forward Planning Team to remove Options 103.1 and 104.1 from the Plan on this basis. • The vast majority of the existing housing stock along Riverbank Road was built over 100 years ago, long before the existence of the Wirral Green Belt. The very few additions since then (three bungalows) have been an exception to a rule of no further development along the coastal strip. Over the years there have been many well documented attempts to develop the coastal strip, but local planners have always known the environmental and social importance of preserving this part of the Wirral. The current councillors & planners should avoid the shame of being the ones who finally "gave in" to developers and landowners, whose only interest is financial gain. We ask the Forward Planning Team to remove Options 103.1 and 104.1 from the Local Plan in light of this long and extensive, historic precedent. • Applying the term "Infill Village" to short strips of houses on the coastal plain is stretching the concept of infilling a village beyond credibility. In the case of Riverbank Road, we have 23 properties, 95% of which were built more than 100 years ago. It is difficult to see how these two short and very old strip developments can be treated as a "Village" in any sense of the word. If anything, building on SP103 would constitute an extension of Lower Heswall into the Green Belt. This is clearly legally and morally unacceptable. In addition, the criteria to be used in determining what can and cannot be classed as an "Infill Village" have not been released by the Council, for public scrutiny. That seems wrong, and could make this whole consultation invalid and subject to legal challenge. We ask the Forward Planning Team to remove Options 103.1 and 104.1 from the Local Plan on this basis. <p>Option 103.1</p> <ul style="list-style-type: none"> • The Summary of Initial Green Belt Assessment (Sept 2018) states that SP103 is not suitable for release from the Green Belt. We fully support that conclusion. However, Option 103.1 proposes identifying the properties at Nos. 4 to 14 Riverbank Road (SP103A) as a new Infill Village in the Green Belt. In reality, this would offer little by way of development opportunity, and has probably only been added to the Plan to create precedent for future changes in policy. There is only one garden, at No.14, which has the space to offer significant infill development potential. This is positioned right next to Welsh Water's extensive (and noxious) storm water storage on the south west side and a WeBS core count area on the north west – hardly a site of first choice. We urge the Forward Planning Team to remove Option 103.1 from further consideration in Appendix 16 on the basis that there is no real benefit to this Option and that it should not be used to give precedent to further, future development on that side of Riverbank Road. <p>Option 104.1</p> <ul style="list-style-type: none"> • The Summary of Initial Green Belt Assessment (Sept 2018) states that SP104 is not suitable for release from the green belt. We fully support this. However, Option 104.1 proposes to identify the properties at Nos. 9 to 31 Riverbank Road (SP104A) as a new Infill Village in the Green Belt, with the possibility of development on SHLAA 1968, giving an additional capacity of up to 45 dwellings. The addition of 45 new dwellings would treble the number of houses on the road, significantly changing the look and feel of the neighbourhood which has been more or less the same for more than 100 years. We ask the Forward Planning Team to remove Option 104.1 from Appendix 16 on this basis. • Since SHLAA 1968 is only currently developed on two sides, development of any sort on this land would break a continuous stretch of Green Belt. It would isolate SP104 from a continuous section of Green Belt running along the south west side of the Wirral Way towards Gayton. This is counter to the stated intentions of the current review and to Government Green Belt legislation. All round a deeply retrograde step for this part of the coastal strip. We ask the Forward Planning Team to remove Option 104.1 from Appendix on this basis. • Commentary in the Summary talks only about "single, built-up frontage" between No. 5 and Nos. 7 to 9 Riverbank Road. This cannot possibly add up to the 45 dwellings quoted, and this point requires clarification. Commentary is also incomplete in simply stating that the frontage of Nos. 4 to 14 is "opposite" SHLAA 1968. That is so, but there is an additional 100m of road north east of No.4 which is clear farmland on both sides of the road. We ask the Forward Planning Team to edit the Commentary on this Option to clarify these issues. • Any development on the odd-numbered side of Riverbank Road has the potential to exacerbate flooding issues caused by runoff. Many of the gardens on this side of the road already flood in

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	<p>winter. We, for example, have to use a pump to get rid of the water which accumulates across our garden. Replacement of farmland and grass with concrete and tarmac will simply make matters worse. Please be assured that we will have no hesitation in taking legal action against the Council should Option 104.1 go ahead sometime in the future and lead to serious and damaging flooding of our property. We ask the Forward Planning Team to take out Option 104.1 from Appendix 16 in order to remove these risks.</p> <ul style="list-style-type: none"> Any development of SHLAA 1968 would bring unacceptable loss of best and most versatile agricultural land, unacceptable additional strain on an already struggling sewer and drainage system in this area, and unacceptable safety and capacity issues on the small and already overcrowded Station Rd, Village Rd and Gayton Rd. In addition, the further development of either side of Riverbank Road would block wildlife corridors across SHA 1968, with foxes, stoats and the like resident in the area. Badgers also have their setts on this land, and birds use it in a similar way to the farmland across the road, in SP104, a core bird count area. We ask the Forward Planning Team to remove Option 104.1 from Appendix 16 on this basis. <p>All four properties at No.31 Riverbank Road are covered by a restrictive covenant that precludes the addition of any further, separate buildings to the land. In addition, No.31 directly abuts the Dee Estuary SSSI / Ramsar site, being within the 50m Natural England SSSI Impact Risk Area, with gardens being used by a range of wetland birds and wildlife. On this basis, we request that the Forward Planning Team remove No.31 Riverbank Road from any proposal for an Infill Village in this location. Any Infill Village would then stop at the current No.27, as there is now no No. 29 Riverbank Road. No.29 disappeared from the Land Registry in 2000 when the single property at No.29 was split into four properties now known as Nos. 1 to 4 of No.31 Riverbank Road.</p>
DOR00813	<p>I am writing to express my deep concern at the plans to release Green Belt land to build on the fields on either side of Levers Causeway. I feel that this will have a very detrimental effect on our local area, not only losing a significant chunk of agricultural land but also completely changing the beauty, views, landscape and character of our local countryside for ever. This would significantly affect our local environment and natural habitat such as the Mountwood Conservation area in which we live.</p> <p>I cannot understand why it is necessary to build such a lot of houses in an area which so enhances our local environment. My family and I have lived in this area for many years and like many other local residents we appreciate the opportunity to spend our leisure time enjoying the unrestricted views and landscape across these fields which give great pleasure and many hours of relaxation and exercise to so many local residents. We feel very privileged to live on the Wirral and one of the attractions is the availability of countryside like this which makes the area desirable, and I feel very strongly that the plans to build so many houses in prime, open countryside such as this will change the character of our local area and lose the identity of classic and beautiful villages such as Storeton for ever. I also feel that these changes to our landscape would have a negative economic impact of house prices in the area, and would significantly change the demographic so would therefore be grateful if you could note my strong objection to these plans please.</p>
DOR00814	<p>I am writing in response to the Council's proposals and background documents for future development over the next 15 years and wish to make the following contribution to the consultation process. Firstly, I would like to point out that the period of consultation allowed by the Council for such an important document is ridiculously short. Further, the updated ONS figures were released some weeks after the official Council consultation started and that to date key background documents are still missing. Given all this, I believe the Council need to extend the consultation period or else face a challenge to the legality of this consultation.</p> <p>The population of Wirral is decreasing, the current infrastructure is fully stretched to cope with the current demands (e.g. health, social services, roads) and there are no significant increases in jobs likely over the planned period. Hence, as even the government admits, there is no pressure on housing on Wirral. What Wirral does need is affordable housing in the correct place. I welcome, therefore, the Council's stated intention of doing all that it can to protect Wirral's Green Belt and maximise building on brownfield sites. The Council must surely then be delighted with the publication of the recently updated Office of National Statistics (ONS) data that clearly indicates the estimated need for Wirral is around half of that quoted in the earlier (July) Council paper. As the new National Planning and Policy Framework requires of Council's like ours, which will have no updated local plan before January 24 next year, to use the standard method for calculating housing need using these updated ONS figures that are in line with but still above the historic trend. Using these updated ONS projections indicates that only some 488 units per annum are now required, 7,320 over the 15 year period.</p> <p>In addition, I believe that the Council is in error in the way it has taken account of both the buffer and Wirral Waters in the July paper:</p> <p>The buffer requirement which should be moved into the first 5 year period, should not add to the total overall housing need as has been done in the Council paper. This buffer is simply a matter of phasing within the total estimated need, bringing more houses into the first five year period, but correspondingly the remaining need for years 5-15 should simply be the total need minus the dwellings allocated to years 1-5 which includes the buffer.</p> <p>The Council's paper of July took only 1100 houses from Wirral Waters into account for the total 15 year period. The National Planning Guidance says planning policies should identify a supply of:</p> <ol style="list-style-type: none"> specific, deliverable sites for years one to five of the plan period (i.e. by 2025) specific, developable sites or broad locations for growth, for years 6-10 (by 2030) and, where possible, for years 11-15 (by 2035) of the plan. <p>The Council should allocate at least the 900 or so houses already planned for Wirral Waters for the first period, but as the NPPF requirements for periods 5-10 and 10-15 years are much less stringent, then the Council should take account in their policy the other of the 6450 dwellings indicated by Peel Holdings for the 15 year plan period i.e. and extra 5350 in total over the 1100 figure used by the Council. Taking account of the updated ONS figures, the misinterpretation of the buffer requirement and the additional scope from Wirral Waters I believe eliminates any need to use Green Belt to satisfy the predicted housing need over the plan's 15 year period (2020 – 2035). In addition, the Council has over 2,400 units identified on brown field sites (albeit some at Wirral Waters) and also has between 4,000 and 6,000 empty properties that could be brought back into habitable use which further eliminates any need to use Green Belt for development. The Council</p>

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	<p>should therefore be delighted with this scope to eliminate pressure on the Green Belt. Any continued wish to build on the Green Belt by the Council can only mean that they are being disingenuous with residents and are progressing a different agenda.</p> <p>In addition, a number of these areas contain valuable farmland that surely we should be wanting to protect. The NPPF refers to the need to retain the "best and most versatile agricultural land". Agricultural production will become progressively more and more important into the future – not just because of Brexit but the fact that measured by weight humans make up less than 0.5% of the planet's animals but consume 25% of its plants' production. Hence we should be ensuring protection of all such land as much as possible.</p> <p>[Table of Specific Site comments attached]</p>
DOR00815	<p>To whomever it concerns i.e. those intent on destroying the beauty of Wirral.</p> <p>Reading every day about the destruction of our beautiful green belt for housing that has been proved to be NOT needed on the whole, I am distraught to see how much of where I live in Saughall Massie is going to be destroyed and turned into a sprawl of mass housing.</p> <p>I wonder if anyone in our council is aware of what green belt is and what green belt contributes to the earth and people who live here:</p> <ol style="list-style-type: none"> 1. to check unrestricted sprawl of large built up areas 2. to prevent neighbouring towns from merging into each other 3. to assist in safeguarding the countryside from encroachment 4. to preserve the setting and special character of historic towns 5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land <p>WIRRAL COUNCIL IS IGNORING ALL FIVE</p>
DOR00816	[SAME AS DOR01052]
DOR00817	<p>As I understand, there are a number of ecologically important sites that are up for consideration for development in Wirral. The most affected sites are Dibbinsdale Nature Reserve and Red Rocks, Royal Liverpool Golf Course (but I've been led to understand that these sites have been included because of the way a Green Belt reviews works). There are over 70 Sites of Biological Importance in Wirral but it appears that the most affected sites for proposed development include Storeton Woods, Harrock Wood and Eastham Country Park. These small areas of woodlands are home to legally protected species such as bats, and species of conservation concern such as barn owls, toads, and a variety of other bird species and flora, such as English Bluebells now endangered.</p> <p>Other wider environmental concerns for building on our green belt and SSSI sites include loss of high-quality farmland in a time of climate change which is already having adverse effects on our wildlife such as bees, our food supplies, increased air pollution, and risks of increased flooding.</p> <p>I understand the projected housing development numbers put forward by WBC do not match the population levels of Wirral; Wirral's population can be considered stable (in fact, it's slowly decreasing). Isn't this why schools such as The Dell Primary School and Rock Ferry High School, an asset to the community, was closed down and demolished (unless there was another reason not openly put forward to the community)? Basic research shows that Wirral already has over 50% of its land developed, should further development take place, that figure is set to rise over 60%. In areas where tourism has a hold insensitive development would harm what precious little tourism Wirral has. Furthermore, there are no major industries in Wirral therefore, there is no rationale for the 800 per year building quota that WBC puts forward.</p> <p>In the light of the housing 'crisis', it is appropriate and expected that brownfield land should be developed first and there is enough in Wirral to fulfil the quota of houses thus far required. Peel Holding's Wirral Waters project would go a long way to closing the numbers gap. It is also common knowledge that green belt land will be developed for the luxury market leading to more land depletion for wildlife. Wirral, sadly, is already a region low on species diversity, therefore development on wildlife corridors must be taken into account. Biodiversity has declined globally over the last forty years. In the 1960's Rachel Carson pointed out to the decline of species due to poor agricultural practice and that decline has reached the Rubicon; it is now almost irreversible. Many of us are, against the odds, trying to mitigate further decline of species, but this can only happen with more trees and open spaces to off-set rising carbon and help species recover. New gardens will not be a significant help as fences, concrete posts and driveways block corridors for wildlife to hunt, feed, breed and survive; an example is the hedgehog, which, according to the British Trust for Ornithology calculates Britain has lost around 30% of this beloved mammal, equating to fewer than a million hedgehogs left in the UK today. Tragically, we are losing hedgehogs at the same rate as tigers are globally – at around 5% a year, both in rural and urban habitats.</p> <p>In Wirral, an East/West economic divide exists, with residents on the East side suffering some of the worst poverty in the United Kingdom. In Eastham, local school children compiled a project into pollution in the surrounding area. They found high levels of noise pollution, air pollution from automobiles and aviation and Eastham and Ellesmere Port oil refineries. A more consistent study was carried out by Mersey Forest and they calculated that every £1.00 spent on open space was worth £7.00 in savings to the NHS, an important consideration that cannot be ignored in these NHS cash-strapped times. If our Green Belt and special places are lost or reduced, the wildlife goes with it and our sense of place and purpose. A reduction of trees will equal more carbon, creating an unmitigated disaster. All life on earth is experiencing the sixth mass extinction due to human pressure and global climate change. WBC cannot afford to be idle or complacent in the face of such an</p>

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	<p>urgent crisis. Building on our green belt and tearing up our woodlands would be reprehensible in the strongest terms; the damage inflicted irreversible. Species needs green belt as it acts as a buffer from the concrete sprawl, and woodlands to thrive and survive and we all benefit as a result. We are a part of Nature; we are not anterior to it.</p> <p>In September 2018, [council officer] tried to convince residents that Eastham Country Park was safe from development, without success. I call on you to disclose your development plans for our SSSI sites and woodlands. We want WBC to recognise that our woodlands and green belt should not be sold off; these precious places are necessary for wildlife and for a healthy eco-system to thrive. We expect that WBC will do everything in its power to save these ecologically precious spaces for wildlife and for the health and well-being of Wirral's residents.</p> <p>With reference to proposed building on our green belt land, it's been brought to my attention that land has already been sold to developers prior to public consultation and prior to WBC producing its Local Plan. If this action is correct it is in breach of planning law and regulations and will be defended vigorously by the community.</p>
DOR00818	<p>As resident of Eastham for 70yrs, I would like to register my objection to the council's Current proposals to reclassify green belt land for housing and industry, with the proposals to close the drop in centre ,library and poor condition of our roads due to lack of maintenance it is obvious that Eastham will be in constant grid lock with the traffic and pollution and schools will be overcrowded</p>
DOR00819	<p>I strongly object to the above Local Plan for the following reasons: General</p> <ul style="list-style-type: none"> • I do not believe the Local Plan has been positively prepared and derived in an unbiased way that is based on fact. Analyses on the need for the housing amounts required are flawed, overestimated by approximately two-thirds and therefore render the need to utilise Green Belt land, rather than brownfield land, spurious and ill conceived. Consequently, the Local Plan is inaccurate in determining the actual local needs for housing, land for businesses, community facilities, infrastructure (e.g. for transport, water, energy), education, shops, facilities for sport and leisure etc., which should have been identified through the studies which make up the evidence base. The Local Plan has been rushed through, as evidenced by the well-publicised debacles over its preparation, accusations of corruptive practices and the history behind its late submission. • The chosen strategy of the Local Plan lacks justification and has not been shown to be the best one compared with the consideration of viable alternatives. For example, it is totally unclear how the Sustainability Appraisal has informed the Local Plan. The emphasis on utilising Green Belt land in the Local Plan flies in the face of Sustainability and therefore requires particularly rigorous justification: such justification is sadly lacking, especially in the light of flawed statistical analyses of needs. The Sustainability Appraisal report should set such justification out and can help compare alternative options: this has not been done. The Local Plan has not been prepared with sufficient participation of the Local Community and is clearly not founded on ample and accurate evidence. It is not backed up by well-established facts and cannot be justified or relied upon in its direction or determinations. • The Local Plan is incomplete and lacks efficacy. There is no information on how the Plan will be delivered during its lifetime and it lacks any clear and comprehensible 'implementation plan'. Delivery partners (e.g. strategic highway authorities, the Environment Agency, water companies) are not signed up to the plan. There is no indication of when sites will come forward and the developers and their ambitions are opaque and nebulous. It is unclear how the Local Plan will be monitored. The Plan shows no sign of flexibility and would be unable to deal with changing circumstances (e.g. what if a big site doesn't come forward for development when expected). • The Local Plan is inconsistent with National Policy as set out in the National Planning Policy Framework. It fails to reflect national guidelines on the use of Green Belt Land on all five counts. For example, it lacks sufficient justification to utilise such a precious resource as Green Belt land when viable alternatives such as available brownfield lands have not been adequately considered. <p>Specific - Site Reference SP071 SHLAA ref 1549</p> <p>Whilst it is acknowledged that the proposed use of this land is still under investigation according to the Local Plan, it is unclear why this is not already complete and included in the Local Plan. Why is this? Please reply in writing.</p> <p>Mention is made of the 'protect' category of Gayton Park, but this is not reflected on the Map of the pertaining Green Belt Site within the Local Plan. Gayton Park and its status as part of a Sport Covenant is not mentioned, nor the position and boundary of Gayton Park properly delineated and marked as an exclusion to the Local Plan. There is a distinct lack of clarity of what land is actually being proposed for use and development in terms of Green Belt. Please send me clarification in writing and amend the Local Plan accordingly.</p> <p>The bottom of Gayton Park at the Broadmead end is extremely wet and boggy. This used to be the site of ponds in the past and the topographical fall from the Chester Road increases water run-off into the bottom corner adjacent to the termination of Broadmead. The water table has been added to in this area by the more recent addition of a drainage system from Heswall Football Club. This has exacerbated the waterlogging, as no provision was made to improve an outlet for this additional run-off. If future development is planned, it should be recognised there will need to be adequate investment made to improve environmental drainage from this area with consequential expansion and amelioration of services to accommodate increased water flow and efficient hydrological dispersion. Has this need been factored into development costs for proposed future use in the SP071 portfolio? Please provide a written reply.</p>
DOR00820	<p>The potential release of Greenbelt in the Bebington area of Wirral, either side of Lever causeway, would destroy the whole character of the area.</p> <p>Lever causeway provides safe, off road access, to the open country side and cross country walks, for all members of the local community, particularly children, young cyclists and mothers and grandparents with prams.</p> <p>Wirral is known as one of the top equestrian areas in the UK , a large part of the area currently used would be lost.</p> <p>The sprawl created by merging Storeton, Bebington and Prenton would mean a vast increase in traffic and congestion.</p> <p>The associated reduction in green spaces and increase in traffic pollution would adversely affect resident's health.</p>

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	In 2017 Bebington was voted the top place in the Royal Mail ranking of the top 9 places to live and work in England. It won't be that again if this vandalism is allowed to proceed.
DOR00821	<p>The Wirral is renowned for its beautiful open spaces and Bebington is known for being one of the best places to live. It is not a very big area and therefore any encroachment on its greenbelt would spoil its stunning views and pleasant environment.</p> <p>Lever Causeway, not too long ago, had a pathway made for walkers, cyclists and horse riders to move safely down this lovely stretch of the route. Many young children have learnt to ride, scoot and skate along this straight safe pathway and is in constant use most times of the day.</p> <p>The increase in traffic would result in congestion and pollution and destroy many peoples preferred place to exercise.</p> <p>With careful thought sufficient urban land could be found to build suitable homes nearer shops, schools etc.</p> <p>Please let common sense prevail and the people will actually mean something.</p>
DOR00822	I am horrified & dismayed that despite the Councillor saying earlier in the year that you would not be building on The Greenbelt, that you are now considering just that. The Wirral is such a beautiful area to live in that if your ridiculous plans go ahead we are in great danger of losing our important green open spaces & more importantly farmland. Yes the borough needs affordable housing, although it now transpires that your figures are grossly inaccurate, but use the existing brownfield sites instead, use the empty council properties, use the houses Peel Holdings are to build but DO NOT touch The greenbelt. We need our open spaces, we need The greenbelt, we need our farms & farmers need their livelihoods. PLEASE DO NOT DESTROY OUR COUNTRYSIDE.
DOR00823	We are writing to you regarding the proposed building of 85 houses. We strongly object to this plan to build on Green Belt land in our village. All other avenues of development should be exhausted before any Green Belt Land is built on. This obviously has not been done.
DOR00824	<p>Comments regarding specific proposed housing allocations</p> <p>SHLAA 0716 – North of 90 to 92 Grange Road, West Kirby and</p> <p>SHLAA 0718 – East of 92 Grange Road, West Kirby</p> <p>Development on these sites would fundamentally alter the character of the area. The sites are not appropriate for development due to the close proximity of 'sensitive receptors' (e.g. residents of the nearby nursing home) in terms of noise nuisance. The road network around West Kirby already struggles to cope with current traffic levels and any further development would exacerbate congestion, parking issues and air pollution. These sites are an important urban green space for many reasons, particularly as a 'soakaway' for mitigating surface water run-off.</p> <p>SHLAA 3009 – Grange Hill Farm West, West Kirby and</p> <p>SHLAA 0916 – Land at Grange Hill Farm, West Kirby</p> <p>Development on these sites would fundamentally alter the character of the area. The surrounding area of Grange Hill is an important green space for recreation, and development of these sites would negatively impact people's quiet enjoyment of the area and the nearby war memorial. Development on these sites would create difficulties in accessing the footpath on to Grange Hill, the allotments and properties in Grange Old Road. Grange Hill is designated as a Regionally Important Geological / Geomorphological Site (RIGS) and a Local Site of Biological Interest (SBI), with a healthy population of common lizards (<i>Zootoca vivipara</i>) which may be adversely affected by development on these sites. Roads in the immediate area are not suitable for the increased levels of traffic that would result from development, and the junction between Grange Old Road and Black Horse Hill would become particularly hazardous. Development could create shading issues affecting the neighbouring allotments. Greater areas of hard-standing would also result in increased surface water run-off, creating further problems for the allotments and nearby properties. The neighbouring properties and allotments would also experience increased levels of air pollution, and dust and noise nuisance.</p> <p>General comments regarding green belt and wider concerns</p> <p>The formula used to estimate the local housing requirement was fundamentally flawed, as has now been acknowledged. This should have been challenged at the earliest opportunity. Wirral Council has the power to compel developers – the Peel Group in particular – to deliver on promised house-building on brownfield sites. The Council is failing to act in this regard and the conduct of the developers looks increasingly like 'land banking'. The consultation process itself could have been better. At the public meeting I attended, in response to many questions we were told the information was not available and there was a sense that most questions were not answered satisfactorily.</p> <p>Planning regulations require some updating. The UK is one of the most wildlife-depleted countries in the world. Numerous studies have demonstrated the benefits of urban green spaces. These include, but are not limited to: acting as soakaways for surface water run-off, alleviating localised flooding; mitigating air and groundwater pollution; offsetting climate change; improving the physical and mental health of the local community; providing habitats for wildlife; mitigating temperature extremes by reducing the 'urban heat island effect'; enhancing the aesthetic appeal and 'sense of place' of an area. At the public meeting I attended it was suggested that development of urban green spaces that were already 'enclosed' (surrounded by other development) would not be too problematic. I strongly disagree. 'Wildlife corridors' (connected habitats) are preferable, but, as outlined above, urban green spaces provide many benefits. A further category of land type should be considered to describe those sites which are currently included in the 'brownfield' description (i.e. 'developed' sites) but which have not previously been developed as most people would understand it, e.g. fields, gardens, etc., in other words, 'urban green spaces'. With regards to development on green belt or in urban green spaces, it is necessary to proceed on the basis of 'once it's gone, it's gone'. Given the range of 'ecosystem services' and benefits we gain from green belt land and urban green spaces, development should not be permitted on any of these sites while there</p>

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	are any undeveloped 'true' brownfield sites in the wider area, and then only if absolutely necessary.
DOR00825	<p>I would like to raise my objections to the potential building on Higher Bebington Green Belt land and the reasons for this are as follows:-</p> <ol style="list-style-type: none"> 1. There is sufficient land in urban areas to build upon 2. The population projection does not warrant for 12,000 houses 3. It will spoil the character of the area 4. Higher Bebington and its open spaces provide an area for relaxation and exercise for innumerable local residents as well as wildlife 5. Unrivalled views will be destroyed, irreparable damage to its setting 6. Increased traffic and major congestion 7. Acres of prime agricultural land will be lost 8. Damage to Mountwood Conservation area 9. The sites from Clatterbridge to Prenton are huge. Once released from Green Belt, building could create unrestricted sprawl and historic towns and villages could be merged together 10. Use the Wirral's already empty 5,000 properties and the already existing sites for 18,000 homes instead.
DOR00826	I am writing to add my concerns regarding the possibility of future building on Wirral greenbelt. I am sure you are aware of all the facts and figures so will not dwell on these and I do not object to building homes where there is a real need. I just wish to express my hope that as much of the countryside can be preserved once built on it will be lost forever. Please give the utmost thought to this matter in your decision.
DOR00827	<p>[SAME AS DOR01052] [SAME AS DOR01178]</p>
DOR00828	[SAME AS DOR00455]
DOR00829	[SAME AS DOR01052]
DOR00830	<p>I am asking you to stop the destruction of our landscape. The housing issue can be resolved by using brown-belt and redevelopment of other areas.</p> <p>Please don't rob the Wirral of its beauty.</p>
DOR00831	<p>I refer to your proposals for housing need and availability and in particular the Council's unfounded assessment that Wirral does not have enough brownfield or urban land to cater for the housing needs. This was confirmed by Councillor, Cabinet Member - Housing & Planning (and Deputy Leader of the Council), who said:</p> <p>"The Government have set Wirral a target, which means we must make enough land available to allow for 12,000 new homes to be built in Wirral by 2035. We know, and so do Government ministers, that we do not have enough brownfield or urban land to enable housebuilding on this scale."</p> <p>This is very important because it would appear that this Council has made up its mind to build on Green Belt, and therefore has produced various reports in order to justify this assertion. The reports relate to both housing needs and availability. As an example, in one of its statements the Council put forward a figure of 4,990 as a basic requirement for additional homes over the 15 year period. It then added, erroneously, a further 2,400 as a buffer, thereby alleging there was a shortfall of 7,390. The buffer calculation was incorrect and therefore the shortfall, even based on their figures, should have remained at 4,990. The shortfall was after the Council's statement that Wirral Waters' allowance was 1,100. In fact the Wirral Waters' figure was 6,450, thus completely eradicating any necessity to build on Green Belt. Furthermore, the Council is understood to have between 4,500 and 5,000 vacant/empty houses which they have also excluded from the housing availability figures. It is not known whether there are further omissions, or different figures being put forward, but the confusion over the reporting of basic facts is somewhat alarming, considering that the implications for current and future generations are so serious.</p> <p>Making the Council's position even more untenable is the fact that the Government is now stating that Wirral's target has been reduced to circa 500 per annum, thus reducing the total housing requirement to 7,500 over the next 15 years and not 12,000. It is understood that the Council is seeking to confirm the revised target, which is understandable, but it must do so with honesty and integrity, and not inflate the figures just to back up its flawed argument that we must build on Green Belt. Under no circumstances should any development be considered on Green Belt and the existing boundaries - should be maintained and endure beyond the 15 year plan. It should also desist from designating land as potential infill, although within the Green Belt, to circumvent the Green Belt restrictions. In addition to differing figures being put forward by the Council, the plethora of documents necessary to peruse, in order to obtain a full understanding of all the implications concerning the outcome of Wirral's Local Plan, is literally overwhelming. The Council have been engaged in proposals for several years with a dedicated team, and supported by external consultants with reports extending to several hundred pages. It is not easy to establish which documents should be accessed and their relevant importance in the whole process. Yet the public are expected to access all this information and conclude their views in a matter of weeks. In addition to the Council revising their figures based on the new lower housing requirements, they have also failed to</p>

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	<p>publish the "Strategic Housing Land Availability Assessment (SHLAA), which is one of the most important documents in the whole process of producing the Local Plan. Two further documents have also failed to be published, namely, "Broad Spatial Option Revised Assessment Report" and "Development Viability Baseline Report."</p> <p>Proposals are supposed to be transparent, and in particular National Guidelines stipulate in 16 d "contain policies that are clearly written and unambiguous". It is difficult to see how the Council have complied with this basic requirement. It places a significant doubt as to whether the consultation process is valid, to say the least, and more importantly it requires the Council to re-consider its proposals and base their findings on fact, and not on the desire to build on Green Belt, for the benefit of developers and builders, and to the detriment of residents who the Council are obliged to represent.</p> <p>National Planning Policy Framework (NPPF2)</p> <p>Para 136 states "Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified...." Furthermore, para 137 states, "Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting identified need for development." Para 143 states "Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances."</p> <p>In addition, within the 5 purposes, including para 136 above, NPPF2 sets out the following:</p> <p>Check the unrestricted sprawl of large built-up areas</p> <p>ii Assist in safeguarding the countryside from encroachment</p> <p>iii Assist in urban regeneration by encouraging the recycling of derelict and other urban land</p> <p>However, para 145 states "A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions are e) limited infilling in villages. In addition, the Council in its Green Belt Review Methodology effectively states that it complies with NPPF2. Indeed, it also states that the Council will focus on not reducing the separation between settlements. However, it also introduces a statement, which they obviously perceive as a way of circumventing Green Belt hurdles, and complying with para 145 above, which states "Identify opportunities for re-development and infill (not just release). This represents the underhand way the Council is trying to encourage building on Green Belt and shows the bias towards achieving this aim. It should, instead, be looking at, and highlighting the constraints which are afforded to the areas of land West of Wirral Way in Lower Heswall. The farmland areas from Wirral Way down to the coast have never been regarded as infill villages and as mentioned above merely seems to represent a mechanism for allowing development at some time in the future for development to take place. It seems that the designation of this land does not comprise an infill village and any development would be inappropriate, on any reasonable and logic assessment.</p> <p>Within the document entitled INITIAL GREEN BELT REVIEW - BACKGROUND REPORT - SEPTEMBER 2018 Para 6.4 states "Land to the west of the Wirral Way has not been included, because of the role of the Wirral Way in defining a clear physical edge to the existing urban area and the constraints associated with the national and international designation of the Dee coastline". This would imply that the areas were safe from development, bearing in mind all the constraints. However, tucked away in Appendix 16 the Council have re-designated certain areas as infill villages, including the areas west of Wirral Way. This is not transparent or open communication, or indeed clear and unambiguous.</p> <p>Infill Villages & the environment</p> <p>The position regarding infill villages is unclear and, as mentioned, somewhat hidden at Appendix 16. But in addition to Appendix 16 there are also references to the sites in Table 2, pages 17 & 18, Appendices 3, 4, 5, 6, 7, 8 (Map), 9 which also gives site category, 10, 11, 12, 13, 14 (maps for further investigation) and 16. In other words a massive amount of detail which in some instances is not readily digestible, and also contradicts NPPF2's guidelines of clarity and being unambiguous.</p> <p>Making matters worse for the public is the fact that the criteria for assessment of such land has not been released in time to be properly considered before the cut-off date for responses to the latest consultation.</p> <p>Land on both sides of Riverbank Road is prime agricultural land that does not currently have buildings round, or form part of any local village development. They are adjacent to the Wirral Way and other open agricultural land, so to develop would have a huge detrimental effect on the local environment. The Council has a legal duty to protect land adjacent to the Dee Estuary SSSI/Ramsar site. The new plan needs to consider wildlife corridors, preservation of protected species, biodiversity, scientific and recreational benefit. Locally, we have offsite roosting, breeding and feeding of a range of wetland and sea birds. In terms of wildlife corridors they are essential for the preservation of protected species such as badgers, birds of prey, voles, foxes, hedgehogs, harvest mice, curlews and shelducks, amongst others.</p> <p>The Council tries to justify the status of infill villages by stating that parcels of land are pre-developed. If we take Riverbank Road, that parcel of land between Seabank Road and Riverbank Road is described as being developed on 3 sides. Ignoring the Seabank side there is one small bungalow on the section that runs from Davenport to Riverbank, and 4 semidetached, comprising 8 houses, in Riverbank Road, built at</p>

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	<p>end of the 19th century. The area taken up by these 8 properties plus the Welsh Water storm tank, is approx. 15% of the total farmland area. On the other side of Riverbank, going towards Parkgate, 2 sides have no housing at all, one side is adjacent to the Wirral Way with no properties, and towards the coast the final side has one dwelling. The land beyond the Riverbank area, going towards Parkgate, is also farmland, therefore if development did take place this open aspect would be completely obliterated, again contravening NPPF2. The area of farmland on Riverbank Road going towards Parkgate is approx. the same area as the houses going down to the Dee coastline. Current housing consists of 15 dwellings. Within the document entitled "Summary of Initial Green Belt Assessment- September 2018, on page 185 of 194 it states that this area could potentially provide an additional capacity of up to 45 dwellings. This would triple the number of houses and would completely destroy the Green Belt. This could not possibly be described as infill. Interestingly, by making such a statement the Council are pre-judging the situation and begs the question have they been talking to developers.</p> <p>Development in this area would be expensive executive style private housing of a similar nature to that already being developed in Heswall. These are then sold at a great profit by developers to people who already have the means to purchase other available property in Heswall. There is no possibility of joining this area to another, without causing a catastrophic effect on the environment and most importantly there is no need for development in this area. The land west of Wirral Way is only included because it has been offered to the Council, but to develop it would be a direct breach of Wirral Council's commitment to protect such areas, unless exceptional circumstances apply. There are no exceptional circumstances applicable to this area.</p> <p>It is clear that Wirral Council do not consider this land a requirement to satisfy the immediate call for property units. To allow development of green belt without identifying exceptional circumstances, via another route, such as infill villages, would breach current planning law and would be outside the power of Wirral Council, as benefit is only afforded to the developer, whilst simultaneously having a detrimental effect on the land, environment, wildlife and thousands of people who use this area for scientific investigation, health and leisure activities. In particular para 141 of NPPF2 states: "Once Green Belt have been defined, local planning authorities should plan positively to enhance their beneficial use." The use of the word potential should be withdrawn immediately and the land removed from the designation of a village and retained within the Green Belt without any uncertainty as to its future.</p> <p>Infill Villages & the environment</p> <p>Furthermore, one of the major cornerstones of land designation is to have clear separation of settlement areas. Heswall urban area is designated as Settlement area 7 whereas the area west of Wirral Way is designated as Settlement area 8. If development took place within the locality of Lower Heswall within Settlement area 8, it would completely destroy any separation and the land would simply become part of the Heswall urban area. Hardly an infill village. Quite clearly, such development would have a devastating impact on the character, appearance, spatial and visual views of the area in addition to the impact on wildlife, the environment, International, European and National constraints.</p> <p>Also Green Belt GB6 - new developments will be permitted on infill sites, defined as development filling a small gap within the defined built-up envelope of the village.</p> <p>Also 7.22 of GB6 - Many of Wirral's villages are within the Green Belt in which new development is not normally appropriate. However, such villages may contain suitable sites for infill development which would not have an adverse effect on the character of the village or on the open character of the Green Belt. Note the small gap, and of course, the character and openness would be destroyed. Sustainable, as in sustainable housing, means ensuring better lives for ourselves does not mean worse lives for future generations. Sustainable development is about change for the better. Our natural environment is essential to our wellbeing.</p> <p>Coastal Zone</p> <p>The Principles for the Coastal Policy state "preserving and enhancing the character of the coast, in particular, its national and international importance for nature conservation...." The parcel areas west of Wirral way are all located within the Coastal Zone. Furthermore, development will be permitted within the Developed Coastal Zone subject to the following criteria:</p> <p>CO1 (i) the development requires a coastal location, unless the applicant can demonstrate that there is no alternative sites outside the Coastal Zone capable of accommodating the proposed development."</p> <p>CO2 20.20 Few developments require a coastal location, and the undeveloped coast should not be expected to accommodate new development which could be located inland....."</p> <p>CO2 20.21 The fact that the landward undeveloped coast is Green Belt, and that the intertidal are covered by statutory nature conservation designations, provides strong safeguards against inappropriate development in the Undeveloped Coastal Zone."</p> <p>The policy also states that "Protection of landscape quality particularly on the undeveloped coastline is thus of considerable importance."</p> <p>Why does it appear that the Council is abandoning such fundamental principles?</p> <p>Agriculture</p> <p>In AG1 of the UDP - Agriculture it specifies that the Local Planning Authority will need to be satisfied that appropriate measures have been taken in order to:</p> <p>ii minimise direct or indirect disturbance to existing agricultural land uses</p> <p>AG2 - In order to protect Wirral's best and most versatile agricultural land, proposals involving non-agricultural use of land classified, before permission is granted, demonstrate the extent to which it would be practicable to return the land to its former quality if development took place. The parcels of land have been classified as the best quality agricultural land and quite clearly if any</p>

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	<p>development took place it would not be possible to return the land to its former condition.</p> <p>AGR1 - The Protection of Agricultural Strategic Policy also states:</p> <p>"In considering proposals for development on agricultural land the local planning authority will seek to prevent:" the loss of Wirral's best and most versatile agricultural land</p> <p>ii the severance or fragmentation of a farm holding.</p> <p>In addition, the Government is now placing greater emphasis on preserving agricultural land and in particular regarding such a principle, post Brexit, as essential. It is far better to have locally produced foodstuffs, selling locally with the avoidance of transport affecting the environment, etc.</p> <p>Again, it is difficult to understand why the Council appears to be ignoring national and local guidelines.</p> <p>Infrastructure</p> <p>It is difficult to assess the damage to the local infrastructure if development was allowed in the areas west of Wirral Way. There are only 2 ways out of west of Wirral Way, up Station Road and Wittering Lane. Station Road, is relatively narrow and comes to a blind corner when it meets Village Road. Increased traffic would not only have significant pollution implications, but could be a major accident area in waiting. Coming down Station Road to the junction with Davenport and Riverbank, which at that point are part of Wirral Way, the public signs show illustrations of horses, pedestrians, cycles, etc., used by many, such is the popularity of this part of the Wirral. It would be extremely dangerous, specifically at the almost 90 degree curve in the road by the entrance sign, as cars are forced to the wrong side of the road going towards the coast. Similarly, going up to Heswall many pedestrians and cyclists are on the road due to the narrow pathways at this juncture. Riverbank Road, within the fields, are still subject to flooding due to run off from Heswall. Additional housing would cause a significant worsening of this position. It is also understood that severe drainage problems arise in Seabank Road towards the coastline. Further down by Wittering Lane there are also areas of local flooding. Then, think of how the roads would be constructed to enable safe passage out of the area, plus pavements, drainage, communications, lighting, etc. Then consider schooling and doctors.</p> <p>If you stand at the corner of Riverbank next to the official sign designated Wirral Way and look towards the coast there are magnificent views over the fields and into Wales. Similar views would also be evident along the other fields towards Hoylake. This would be lost forever if development took place.</p> <p>Re-generation of Urban areas and brownfield sites</p> <p>Although one of the main purposes of the Local Plan is to re-generate urban land by encouraging the recycling of derelict and other urban land, there seems to be a reluctance of the Council to put pressure on developers and builders to pursue this policy. From a developer or builder's point of view this is understandable insofar as there is much more profit by building on Green Belt. However, the Council is failing in its duty if it does not pursue this policy vigorously. It needs to build up a relationship with developers and builders in order to prioritise what is needed for the community as a whole. Their relationship with Peel Holdings is an example of why some matters are not proceeding as they should. They need to prioritise residents' wishes and not those of the developers and builders. I am sure that residents in some of the deprived areas would much rather have their communities upgraded and opportunities exploited.</p> <p>In this respect, under Planning Policies and Decisions para 118 c) it states: "give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land."</p> <p>Summary</p> <p>The Council needs to take an honest look at their development proposals based on National & Local Policies as well as International, European and National regulations, together with the wishes of the local community. It must also provide figures that have integrity and supported by proven facts, be clear and unambiguous to the residents.</p> <p>In addition, Councillor stated at the start of the consultation process that the residents MUST have their say. He must be held to account by this statement.</p> <p>Perhaps one of the most puzzling aspects of the proposals currently put forward by the Council is the potential land west of Wirral Way being designated infill villages. This involves land at Riverbank Road, Seabank Road Davenport Road, Manners Lane, North & South, & Wittering Lane. There are other areas, but those just mentioned were specifically put forward by [land owner] as part of the Call for Sites exercise.</p> <p>The Council currently identifies infill villages as Barnston Village, Eastham Village, Thornton Hough, Raby Village & Storeton Village. It seems inconceivable that the parcels of land, which are also deemed as high agricultural land, in addition to Wetland and Bio-diversity areas, etc., should suddenly be regarded as villages and categorised as being the same type of village as mentioned above. Such a designation defies belief, and it seems that the only reason for such a designation, and going against all the current National and Local guidelines, is to pave the way for future development. As referred to earlier, the words potential infill should be removed completely, and the parcels of land returnee to its Green Belt status, based on all the recognised constraints, without any incumbrances whatsoever.</p> <p>The Council is reminded of para 133 of NPPF2 which states. "The fundamental aim of Green Belt Policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."</p>

DOR REF	RESPONSE
DOR00832	<p>I wish to object to the proposal to remove the Green Belt status of Parcel Reference SP062, as outlined in the document Proposed Green Belt Sites for Further Investigation in the Wirral Local Plan. This parcel of land is currently designated as Green Belt to protect Barnston Dale, which provides an important habitat for wildlife. In addition, this area of the Green Belt preserves the historic nature of Barnston Village and Dale, mentioned in the Domesday Book. The parcel of land met the criteria of Green Belt in 1983 under the Merseyside Green Belt Local Plan. The reasons for scheduling have not changed and legislation requires that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified. Such circumstances have not been evidenced or justified in the Plan.</p> <p>If residential development of Parcel Reference SP062 was to occur, there would be severe pressure on the already overloaded road network in the area. Local roads Pensby Road (B5138), Barnston Road (A551) and Brimstage Road (A5137) are already congested at peak times and, in particular, the roundabouts at Thingwall (junction of A551 and B5138) and Gayton (junction of A540, A551 and A5137), together with the road junction at Arrowe Park (junction of A551 and A552), are all at their limits. Further afield, Junctions 3 and 4 of the M53 motorway are already at capacity during peak hours.</p> <p>Significant improvement to the road network would need to be made, presumably at the developer's cost, to accommodate the extra traffic. In particular, the improvements required at the motorway junctions would be extensive and costly, allied with the works required to the local roads, which would be likely to involve widening, and hence property take. This, I suggest, would render the development of SP062 'undeliverable' in terms of the National Policy on planning, due to the costs of the road infrastructure improvements, rendering the development uneconomic.</p>
DOR00833	<p>We have read the summary information that you have provided concerning the future development of parts of Heswall, which you have said is to meet governmental obligations. We vehemently oppose the development of green belt land to meet government or council targets. In fact the reasons for not building new homes in the green belt areas of Lower Heswall are so strong that it seems hardly worth investigating the potential of these sites. Our main reasons are as follows:</p> <ol style="list-style-type: none"> 1) Once Green Belt land is lost the uniqueness that so greatly endears the Wirral to its residents will never be recovered. Many see the Council as custodians of the Wirral environment and should fight to preserve this, whatever the cost. Clearly there are also some legal obligations to do this (SSSI etc). 2) The case that Green Belt land might need to be developed appears wrong, as has now been recognized by the Council Leader. In your letter of "August 2018" you said that the government target for the Wirral is 800 homes per year. I now understand that this figure is less than 500 homes per year over the next 15 years, and so only 7500 homes are needed. Clearly a third of these could be met by Peel group developing Wirral Waters, to the minimal amount they have promised (and could meet the entire Wirral target alone over the next 15 years if they develop 92% of the number of homes they originally promised). 3) Within the area there are many species and artefacts of cultural interest. For example, one of us is a professional Zoologist and knows of several biodiversity action plan species in the area, including the great crested newt (<i>Triturus cristatus</i>). There are also thought to be Viking artefacts in the area which would hold up or stop any planned developments. <p>We are sure that the current council leaders would like to be remembered for the way that they defended the Wirral environment in the face of unreasonable government pressures, as opposed to being the people ruined the area for ever. We would be willing to stand and fight with the council to ensure that the latter does not occur.</p>
DOR00834	<p>Objection to certain aspects of the local plan being proposed.</p> <p>That some development needs to go ahead is obvious even a significant amount of house building. But it is the scale of the development that seems completely wrong and will possibly change the face and feel of Wirral forever. And to lose large amounts of Greenbelt is also a great worry.</p> <p>Having lived here for almost 40 years we are constantly grateful for our luck in finding this wonderful "island". So please do your best to limit the development to brown field sites and keep the scale of it down.</p>
DOR00835	<p>I am emailing with regards to the proposed development on Wirral's green belt, in particular site reference SP061.</p> <p>My concerns are as follows:</p> <p>The areas of green belt between Thingwall, Pensby and Barnston stop them from merging into one large suburban sprawl. Wirral is a semi-rural area that has distinct towns and villages, building on the green areas that separate them destroys that.</p> <p>Barnston Road is already incredibly busy at rush hour especially round Arrowe Park, more houses will only make this worse. Similarly, will more jobs be created in Wirral or will the majority of Wirral residents still have to travel over to Liverpool to work? Therefore putting even more of a strain on both tunnels.</p> <p>Will more money be put into Wirral's infrastructure? How will the local doctors, dentists and schools cope?</p> <p>I strongly feel brownfield sites should be used first. There are many areas of Wirral that have brownfield sites that could be used. It would improve these areas and protect precious green belt land.</p> <p>Now the Office for National Statistics have lowered household projection figures how does this affect Wirral's need for houses?</p> <p>If/when Britain leaves the EU, farmland will be needed more than ever if we are to be more self-sustained, how will building on farmland help this?</p>
DOR00836	<p>Just to let you know I wish to lodge my objection to the use of greenbelt land for housing development.</p> <p>The Wirral peninsular is a very compact and special place and losing what little open space we have to developers will totally destroy the unique character of this Wirral peninsular.</p>

DOR REF	RESPONSE
DOR00837	<p>I am writing in response to the public consultation on Wirral Council's Local Plan Development Options. I have not previously engaged with the local planning process, and the protocols, procedures and issues involved are still relatively unfamiliar to me.</p> <p>My comments relate mainly to the document entitled Initial Green Belt Review Summary of Initial Assessment, together with the Initial Green Belt Review Background Report (pp. 26-33). More specifically, they relate to the proposed options for potential release of Green Belt land in Bebington ward, including the following sites:</p> <p>SP030 - North of Lever Causeway SP031 - West of Landican Lane, Storeton SP032 - Little Storeton SP033 - South of Lever Causeway SP034 - Storeton Village SP035 - North of Marsh Lane SP036 - South of Rest Hill Road SP037 - South of Red Hill Road SP038 - Brackenwood Park and Golf Course SP039 - South of Peter Price's Lane SP040 - East of M53 Junction 4 SP040 - Land at Keepers Lane, Storeton</p> <p>In summary, I object to the proposed options for potential release of Green Belt land at these sites on the grounds that they risk undermining both the statutory purposes of Green Belt designation and aspects of wider national policies. More explanation around these risks will be helpful in further iterations of the Local Plan.</p> <p>Where significant shortfalls in local housing supply are robustly evidenced, then well planned new housing developments in the Wirral will be essential to meet the housing needs of the local population into the future. In common with many other local residents, I believe the Council should incentivise, prioritise and maximise the development of suitable brownfield sites before taking any steps to irrevocably release existing Green Belt land.</p> <p>It is not clear in the reports how the Council plans to incentivise the priority development and realisation of the Wirral Waters Scheme. Nor is it clear how the Council proposes to manage sequentially the development of brownfield versus potential Green Belt sites. It will be helpful in future iterations of the Local Plan to provide a more detailed account of the Council's policy position on use of brownfield sites first, and how it will incentivise the Wirral Waters proposed development.</p> <p>The sandstone escarpment of Storeton Ridge and the surrounding landscape and environment are integral to the special character of the Wirral peninsula. The views from Storeton Ridge across to the River Mersey in the East and to the River Dee and Welsh Hills in the West are of rare natural beauty and are unparalleled in the Wirral.</p> <p>The Green Belt land to the East of the M53 constitutes a significant local amenity for the local residents not only of Bebington but also surrounding areas, including areas of significant social deprivation. This land is well used for walking, cycling and equestrian activities, with well-established public footpaths and bridleways, as well as for farming. It is important that the natural beauty and established amenities of this local area should be safeguarded for future generations.</p> <p>The proposed options for potential release of Green Belt land for development in Bebington ward risk undermining the statutory purposes of the Green Belt in the following ways:</p> <ol style="list-style-type: none"> by leading to further sprawl of the already large built up areas of Bebington and Birkenhead; by risking, through encroachment, the future merging of Storeton and Little Storeton into the built up area; by encroaching into countryside of a distinctly rural character and rare natural beauty; by risking, through encroachment, the setting and historic character not only of Storeton and Little Storeton, but also the Higher Bebington garden suburb; by disincentivising urban regeneration through the recycling of derelict and other urban land. <p>It will be helpful in further iterations of the Local Plan to explain in more detail how the views from Storeton Ridge, the setting and historic character of Storeton, Little Storeton and Brimstage, and the amenities provided by the surrounding countryside, will be safeguarded for the future.</p> <p>The reasons and justification for the predominant focus of development options for the potential release of Green Belt sites to the East of the M53 rather than to the West are unclear in the reports. It is important to local residents in the built up areas in East Wirral (and indeed Liverpool and its suburbs), including areas that are socially deprived, that they should retain easy access to Green Belt countryside and the amenities this provides. However, the predominant focus on releasing Green Belt land to the East of the M53 undermines this priority, and risks exacerbating the social and other inequalities that already exist between the local communities in East and West Wirral.</p> <p>It will be helpful to give clear reasoning and evidence to support the predominant focus of development options on the potential release of Green Belt land to the East of the M53. It will be helpful to explain in more detail how ease of access to Green Belt countryside in the Wirral will be safeguarded and promoted for residents in the built up areas of East Wirral and Liverpool. It will also be</p>

DOR REF	RESPONSE
	<p>helpful to explain how the development options will assist in redressing the inequalities between East and West Wirral.</p> <p>It is unclear in the reports how the potential release of Green Belt land will impact on the local infrastructure, including the local and regional economy, local and regional transport services, and local and regional health and care services. It is unclear, too, how the development options, and changes in local housing supply and demand, are likely to be impacted by Brexit. In future iterations of the Local Plan it will be helpful to provide a more detailed assessment of the potential impacts in these areas. It will also be helpful to make available to the public any independent expert commentary on housing needs projections for the Wirral.</p> <p>It is unclear in the reports how the proposed development options for the potential release of Green Belt land will support wider government policies. Government policy on climate change emphasises the role of green spaces in helping to reduce carbon emissions. Government policy on health promotion and prevention emphasises the role of green spaces and physical activity in promoting good physical and mental health and preventing ill health. It will be helpful to explain how the proposed development options support wider government policies in areas such as these.</p>
DOR00838	<p>Wirral's Green Belt, with its splendid views, walks and recreational areas, and the very distinct identities of its various communities, were key reasons why myself and many other residents chose to live on the Peninsula and raise a family. All this is now at risk, unnecessarily so and we need your help to change things around. Its time Wirral Council stopped blaming everyone else and delivered a Local Plan through a process which gives its Residents real participation and reasonable time to determine what is needed and how it should fit in and around THEIR communities. Instead, there is an apparent determination to release Green Belt and reap short term rewards. This was brought home to residents recently when a senior Council Officer, [council officer], calmly announced that developers and the Council see greenfield development as simple, quick and lucrative. This is just NOT acceptable. It is a flawed approach that must change. I understand that independent professionals, with a different objective and approach, have demonstrated there is NO need to release ANY Green Belt land to provide in a timely fashion even the original, inflated 'Housing Need' let alone the much lower requirement in line with the latest official growth forecasts. As a resident of Irby myself and my family for the past 16 years, I strongly believe the plans would have a disastrous impact on the village. How will the local roads, primary schools, medical centre and other amenities cope with the increase of people? Irby has been allocated an unfair proportion of the proposed sites (over 800 houses), it's a huge amount for such a small village. Developing on one of the proposed sites on Thingwall Road would have a huge impact as on Harrock Woods (National Trust) as it benefits from the surrounding Green Belt land in providing a natural source of food for the wildlife that live there. I therefore demand that the people are heard and that the current process is altered to allow proper involvement of Wirral's Residents, free from the present headlong rush, in order to ensure community identity and our glorious Green belt are retained for the continued delight of Residents and Visitors alike, and more importantly for future generations to enjoy.</p>
DOR00839	<p>I strongly object to the proposed plans to build hundreds of homes on Green Belt land. These homes would probably be out of reach for first time buyers.</p> <p>These spaces are vital for our physical and mental well-being and the environment.</p> <p>The infrastructure isn't in place, our roads can't cope, congestion is terrible at times. Have you ever tried getting through Heswall or Hoylake at rush hour or the school run?</p> <p>How has Peel Holdings managed to buy prime sites on Wirral and not used them yet? the company is worth billions?</p> <p>Do you think the money paid to consultants for designing and building a new golf course was good value for Wirral council tax payers? I imagine few local residents could afford the green fees, the executive homes or the price of a hotel room. Wirral already has plenty of golf courses.</p> <p>Why can't you build on brown field sites and make the empty houses available?</p> <p>What has happened to Birkenhead shopping centre? The Market is such a sad and pitiful site, it's a disgrace!</p>
DOR00840	<p>What are you thinking? Are you mad? Please stop the plan to build on this ancient woodland. It is an irreplaceable heritage site which should be conserved and protected for our children and their children. I strongly object to any plan that would jeopardise its continued existence.</p>
DOR00841	<p>I wish to object most strongly to the council allocating Green Belt Land for development. Wirral is a defined area bounded on 3 sides by water. It would not be a case of building round the edges and still being surrounded by open countryside. If we build on green belt Wirral would very quickly just become another urban suburb of Liverpool. It wouldn't just be houses that would be built the infrastructure to support these homes would have to be built too. Wirral's whole character would be altered beyond recognition.</p> <p>Wirral has been marketed as the Leisure Peninsula but if our green spaces go then visitors to the Wirral to enjoy the countryside would be reduced dramatically.</p> <p>There are a number of other issues listed as follows:</p> <ol style="list-style-type: none"> 1. Local population growth figures do not substantiate the housing targets identified by the Council. Where are these people who will live in these houses work? 2. The number of empty houses in the borough-is anything being done to utilise these? 3. Lack of central Government funding for infrastructure? It is hard enough to get GP appointments now and how will Arrowe Park hospital cope with so many more residents? Are there enough school places? 4. Traffic-at certain points of the day there are long queues on our main roads. I use Arrowe Park road as an example which can back up onto Pensby Road and Thingwall Road East very easily. Public transport in these areas is inadequate now. 5. Loss of biodiversity and loss of access to natural habitats, woodland, footpaths and bridleways. Wirral has a high population of horses in relation to its size. It may not be quantifiable but access to the countryside is extremely precious. It is invaluable to the mental and physical health of Wirral's inhabitants.

DOR REF	RESPONSE
	<p>5. Brown field sites which could be regenerated. The most obvious example is the area between Wallasey and Birkenhead which at the moment is a huge area of neglected land which is quite simply an eyesore. It's criminal waste to leave it as it is.</p> <p>Please reconsider these plans and use this situation to redevelop brown field sites thus protecting green Wirral and improving the derelict and neglected areas so that Wirral remains a pleasant place to live.</p>
DOR00842	[SAME AS DOR00455]
DOR00843	[SAME AS DOR01052]
DOR00844	<p>I would like to log my protest against the building of 1800 homes on SP062 for several reasons</p> <p>The land has been deemed greenbelt land to stop the sprawl of urban development. When will this ever end and is a dangerous precedence to set. Currently there area is used for agricultural requirements. The surrounding infra structure roads, parking schools would not be able to accommodate such developments. I believe there is still a significant areas of brown belt land within the Wirral that should be utilised before other alternatives are considered.</p> <p>I am totally against building on this land as the definition and boundaries between Heswall Pensby and Barnston would totally disappear.</p> <p>I am also concerned at the flooding risk associated with building houses and estates roads on current land that needs to drain</p>
DOR00845	We need more homes for growing families
DOR00846	<p>An interesting observation, when you fly over the UK there is still quite a lot of open land and unlit areas at night. This is not the case when you fly into the Merseyside and Greater Manchester region. On a night flight this region is all very lit up there is not a great deal of open land or farmland. It is one of the most densely populated regions of the UK. You don't need figures to prove this, just look at the sky at night. Wirral Green Belt is presently being considered for release for development. Wirral is a peninsula. The roads are busy. There won't be any new main roads if there is development, there is no room. If the Green Belt is developed the resulting homes will not be affordable homes. The Green Belt areas are on the expensive West side of the Wirral. The properties built there will however increase the coffers of the Council with high band council tax rates. Wirral Council admits that it has struggled to persuade builders to develop the existing East side brown field sites. That is not because they are not available, but because there are easier, fatter profits to be made by building on Green Belt. Developers are sitting back waiting for land to be released here and elsewhere. These threatened fields are of archaeological or historical interest. Between Irby, Thingwall and Pensby one of the larger fields being considered for development has the remains of an ancient three field farming system. Another has an ancient well. Others border National Trust land. The fields are criss-crossed with footpaths and bridle ways, small streams and good views for walkers. The Five Factors governing the reason for and protection of the Green Belt are not being observed.</p> <p>Until recently Council policy was that the historic villages of Irby, Thingwall, Barnston, Greasby and Pensby should remain separate and urban creep should not be allowed to join them. The Council have now decided that these areas should be regarded as one 'Settlement'. The High grade agricultural between these areas is now being considered for sacrifice. In 2011 I worked for the Office of National Statistics for the 2011 Census, I was dismayed at the number of empty and derelict homes in Birkenhead and Wallasey. There are many empty potential building sites. Often filled with rubbish or overgrown with weeds and trees. I work for the NHS in Birkenhead now and many of those empty properties and derelict sites are still empty in 2018. The Council is failing in its duties to manage existing resources and housing stock. The figures that are being used to justify release of the Green Belt are being challenged and are proving to be inaccurate with regard to the real needs and demand for future housing. We can't have the green spaces back once they have gone. The quality of life for the residents of Wirral will be irreparably reduced and damaged by the loss of Green Belt.</p>
DOR00847	<p>As a resident of Bromborough since 1983 I write with deep concern and horror at the plans envisaged by the Council for the Civic Centre and Car Park.</p> <p>Your plans will KILL Bromborough Village!! The shops will die for a start. Do any of the councillors ever walk round the village and weigh up what a lovely, friendly, well used area it is? I cannot believe the powers that be can ever contemplate changing the area as planned. Not every resident has a car. The bus services have been severely cut which makes the local shops essential for a large number of residents in the area. As a member of the U3A since its inception 20 years ago I know how important the Civic Centre has become to us for a variety of events. The majority of our members also use the Car Park and the Library. The shops in the village would suffer greatly if you go ahead with your callous plans. There is not another place within the village which could house all the events that are run over the year. (not just by the U3A). The Civic Centre is THE CENTRE OF THE VILLAGE. Take it away and there will no longer be a village. There is not one person I have spoken to is in favour of your planned changes. I know a great number of people in Bromborough and they are ALL against the planned changes. Surely the residents' opinions are worth consideration by the Council?</p>

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DOR00848	<p>"Infrastructure - As residents we are concerned about potential damage to the local infrastructure if development was allowed in the areas west of Wirral Way. There are only 2 ways out of Lower Heswall, up Station Road and Wittering Lane. Station Road is relatively narrow and comes to a blind corner when it meets Village Road. Increased traffic would not only have significant pollution implications, but could be a major accident area in waiting. Coming down Station Road to the junction with Davenport and Riverbank, which at that point are part of Wirral Way, the public signs show illustrations of horses, pedestrians, cycles, etc., used by many such is the popularity of this part of the Wirral. It would be extremely dangerous, specifically at the almost 90 degree curve in Riverbank Road by the entrance to the Wirral Way, as cars are forced to the wrong side of the road going towards the coast. Similarly, going up to Heswall many pedestrians and cyclists are on the road due to the narrow pathways here. Riverbank Road fields are still subject to flooding due to run off from Heswall. Additional housing would cause a significant worsening of this position. It is also understood that severe drainage problems arise in Seabank Road towards the coastline. Further down by Wittering Lane there are also areas of local flooding. If one stands at the corner of Riverbank next to the official sign designated Wirral Way and look towards the coast there are magnificent views over the fields and into Wales. Similar views would also be evident along the other fields towards Hoylake. This would be lost forever if development took place.</p> <p>Agriculture - In considering proposals for development on agricultural land the local planning authority will seek to prevent:</p> <ul style="list-style-type: none"> • the loss of Wirral's best and most versatile agricultural land • the severance or fragmentation of a farm holding." <p>"In addition, the Government is now placing greater emphasis on preserving agricultural land and in particular regarding such a principle, post Brexit, as essential. It is far better to have locally produced foodstuffs, selling locally with the avoidance of transport affecting the environment, etc.</p> <p>Dee Estuary - The Council has a legal duty to protect land adjacent to the Dee Estuary SSSI/Ramsar site. The new plan needs to consider wildlife corridors, preservation of protected species, biodiversity, scientific and recreational benefit. Locally, we have offsite roosting, breeding and feeding of a range of wetland and sea birds. In terms of wildlife corridors they are essential for the preservation of protected species such as badgers, birds of prey, voles, foxes, hedgehogs, harvest mice, curlews and shelducks, amongst others. The protection of landscape quality, particularly on the undeveloped coastline, is of considerable importance.</p> <p>Health & Wellbeing - The ability to access the green spaces and coastline of our small, beautiful peninsula is essential for all Wirral residents -to enhance physical, emotional and mental health. Surely the Council does not want to reduce the amount of such health giving areas?</p> <p>Leisure & Tourism = income - The Wirral is always marketed as The Leisure Peninsula. The Wirral Way is important as it encourages outdoor activity and tourism. If it becomes surrounded by houses it will no longer be as attractive for visitors resulting in loss of income to local businesses. Equally, building too near the unspoilt coastline will reduce the numbers of tourists looking for a tranquil visit. The protection of landscape quality, particularly on the undeveloped coastline, is of considerable importance.</p> <p>Has the Council taken these into consideration?</p> <p>"• Local population growth figures do not substantiate the housing targets identified by the Council/DCLG</p> <ul style="list-style-type: none"> • Number of existing empty houses • Planning applications that have already been approved but no development has started • Planning applications that may be 'stuck in the system' • Lack of central Government funding for infrastructure • Land values on Green Belt may not be sufficiently profitable to enable developers to build affordable homes which means more expensive homes are built instead • Isolated nature of Green Field sites and access to facilities, e.g. regular public transport, shops, etc. • Loss of biodiversity and public amenities, e.g. access to natural habitats, woodland, footpaths and bridleways, etc. • Lots of new houses leads to new neighbourhoods but what about the impact on core services: doctors, schools, shops, employment opportunities?"
DOR00849	<p>Wirral Local Plan – Development Options Review</p> <p>The Local Plan for Wirral will be expected to include a proper description, identification and assessment of the historic environment and the supporting evidence base is expected to include heritage information. The Plan will need to demonstrate how it conserves and enhances the historic environment of the area and guide how the presumption in favour of sustainable development should be applied locally. This includes ensuring that the sites, which it is proposing to put forward for development, will assist in delivering such a strategy.</p> <p>Development Options - The NPPF makes it clear that the significance of heritage assets can be harmed through development within their setting. There is a requirement in the Town and Country Planning Act 1990 that 'special regard' should be had to the desirability of preserving listed buildings, their setting or any features of special architectural or historic interest which they possess. It is also the duty of the Council to preserve or enhance the character or appearance of its conservation areas and their setting. Where potential development sites appear to include non-designated assets including the possibility for archaeology, their potential should be investigated, and retention/exploration should be promoted.</p> <p>Consequently, before allocating any site there would need to be some evaluation of the impact, which the development might have upon those elements that contribute to the significance of a heritage asset including their setting, through undertaking a heritage impact assessment. The assessment of the sites needs to address the central issue of whether or not the principle of</p>

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	<p>development and loss of any open space is acceptable. It needs to evaluate:</p> <ol style="list-style-type: none"> 1. What contribution the site in its current form makes to those elements which contribute to the significance of the heritage assets. For a number of these heritage assets, it might be the case that the site makes very little or no contribution. 2. What impact the loss of the area and its subsequent development might have upon those elements which contribute to the significance of those heritage assets. 3. If it is likely to result in harm, how might that harm be removed or reduced to an acceptable level. 4. If the harm cannot be reduced or removed, what are the public benefits that outweigh the presumption in favour of the conservation of the heritage asset? <p>The selection of sites for development needs to be informed by an up-to-date evidence base and the Plan should avoid allocating those sites which are likely to result in harm to the significance of the heritage assets of the Plan area. Where adverse impacts are unavoidable, the Plan should consider how any harm might be mitigated. This could include measures such as a reduction of the quantum of development at a site, amending the types of development proposed or locating the development within another part of the site allocation. Such initiatives need to be fully justified and evidenced to ensure that such measures are successful in reducing identified harm.</p> <p>The allocation of sites for development may also present better opportunities for the historic environment. For example, new development may better reveal the significance of heritage assets or may provide an opportunity to tackle heritage at risk.</p> <p>Where relevant, policies for allocated sites may need to make reference to identified historic environment attributes in order to guide how development should be delivered.</p> <p>For example, this might require the policy to include detailed criteria or providing supplementary information with the supporting text.</p> <p>In view of the above, Historic England is concerned that there does not appear to be any assessment of the historic environment to accompany the development options in order to determine whether they are suitable for development. In view of this, Historic England is unable to comment in detail on any of the individual sites, however we have the following general comments to make.</p> <p>The following sites have the potential to harm the historic environment, heritage assets and their setting and therefore need to be addressed through a heritage impact assessment before being included within the next stage of the Local Plan:</p> <p>Housing Allocations</p> <p>SHLAA 0111 East of Devonshire Road, Oxton</p> <p>SHLAA 0684 East of 216 Allport Road, Bromborough</p> <p>SHLAA 0758 93 Chester Street Birkenhead</p> <p>SHLAA 0996 Former Christ Church, Birkenhead</p> <p>SHLAA 1030 Grosvenor Buildings</p> <p>SHLAA 1127 Former St John's Church, Liscard Road</p> <p>SHLAA 1402 Opposite 89 to 99 Park Road East, Birkenhead</p> <p>SHLAA 1518 Former Seacombe Ferry Hotel, Seacombe View</p> <p>SHLAA 1665 Former Rock Ferry High School</p> <p>SHLAA 1685 Read of 36 to 40 Stanley Avenue, Prenton</p> <p>SHLAA 1813 Rear of 24 Pine Walks, Prenton</p> <p>SHLAA 1832 9-11 Highfield Road, Rock Ferry</p> <p>SHLAA 1833/3032 Land at Bebington Road, New Ferry</p> <p>SHLAA 1899 Adjacent to 1 Beatty Close, Caldy</p> <p>SHLAA 2022 Wallasey Town Hall North Annexe</p> <p>SHLAA 2023 Wallasey Town Hall South Annexe</p> <p>SHLAA 2078/2079 Wirral Waters – Northbank East</p> <p>SHLAA 2081/2082 Wirral Waters – Northbank West</p> <p>SHLAA 3032 55 to 66 Bebington Road, New Ferry</p> <p>SHLAA 3039 Land at Naylor Road, Biston</p> <p>Employment Allocations</p> <p>ELPS 324 Former Croda, Prices Way, Bromborough Pool</p> <p>ELPS 060 Kerns Warehouse, Cleveland Street, Birkenhead</p> <p>ELPS 030 Land at Tower Wharf, Twelve Quays</p>

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	<p>ELPS 031 Land at Morpeth Wharf, Twelve Quays SHLAA 3043 Former Lubrizol Plant, Dock Road South, Bromborough Mixed Use Allocations ELPS 129 Wirral Waters – Hydraulic Tower SHLAA 0752 Woodside Regeneration Area SHLAA 2002 Duncan Street Car Park, Birkenhead SHLAA 2014 Conway Building, Birkenhead SHLAA 2026 Treasury Building, Cleveland Street SHLAA 2069 Hinson Street Car Park Green Belt Allocations Historic England will not be commenting on any proposals for the removal of sites in the Green Belt for development. Where it is ultimately considered appropriate to remove a parcel of land from the green belt and it is considered suitable for future development, the local authority would continue to have a duty to safeguard the historic environment and its heritage assets (formally designated or otherwise) in line with government policy and advice. This requirement will be of considerable importance in relation to the preparation of the Local Plan and the need to properly assess the potential for all development sites to harm or benefit the historic environment across the Borough as a whole (in line with the guidance provided in this letter). In relation to the green belt sites being put forward for further investigation, the following have the potential to impact on the historic environment, and therefore, will need further assessment work should they be included as a development site. This should be done prior to their inclusion within the Plan. The sites are: PO002C Barnacre Lane, Saughall Massie SP003 Saughall Massie Conservation Area SP004A/B North of Saughall Massie SP005A East of Garden Hey Road, Saughall Massie SP013 West of Column Road, West Kirkby SP032 Little Storeton SP033 North of Rest Hill Road, Storeton SP034 Storeton Village SP036 North of Red Hill Road, Storeton SP041 West of Brimstage Lane, Storeton SP042 North of Poulton Hall Road, Spital SP044 West of Dibbinsdale Road SP050 West of Rivacre Road, Eastham SP053 St David's Road, Eastham SP059E Rear of Irby Hall SP060 South of Thingwall Road, Irby SP062 West of Barnston Village Historic England strongly advises that you engage conservation, archaeology and urban design colleagues at the Council to ensure that you are aware of all the relevant features of the historic environment and that the historic environment is effectively and efficiently considered in the policies, in the allocation of any site and in the preparation of the SEA. They are also best placed to advise on local historic environment issues and priorities, including access to data held in the HER. This will ensure that there is joined up and robust approach is undertaken to historic environment issues. Historic England would welcome a meeting to discuss the matters raised in this letter.</p>
DOR00850	<p>DEVELOPMENT OPTIONS REVIEW – PROPOSED GREEN BELT SITES FOR FURTHER INVESTIGATION, PARCEL REF SP058E Proposed further investigation into the use of the land West and North of 85 - 105 Pipers Lane, Heswall, including the rear gardens falling within Lane We wish to object strongly to any further investigations into the land referenced here, and object to the intention to develop this land in future. Road issues, i.e. traffic generation, vehicle access and road safety The proposed development would significantly increase traffic volume at the far end of Pipers Lane. Pipers Lane is not capable of handling even a small increase in traffic due to numerous single</p>

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	<p>carriageway sections, with road widening not possible along the length of the lane. The final section of the lane, beyond Redstone Drive, is in fact still only partly adopted, hence no lighting or maintenance of the road at this far end is provided, including during incremental weather. Furthermore, there is no pavement, and no opportunity to provide a pavement in many places. This further increases the road safety risk to pedestrians and the many recreational users, families, and dog walkers using Pipers Lane to access the Wirral way. The foot traffic, bicycle use and horse traffic along this lane make it extremely dangerous for traffic volume increase to occur, particularly along the partly adopted section of the lane.</p> <p>Traffic congestion is an existing issue on Pipers Lane with the current volume of traffic navigating the numerous narrow pinch points. Pipers Lane is the only access to Bush Way, Crossley Drive, Sandfield Park, Warren Way, Pipers Close, The Pipers and Redstone Drive. The quality of the road surface and infrastructure (many potholes, sinking road surface, minimal/limited street lighting) also do not support any increase in traffic. Considering the main access to Piper's Lane to be Delavor Road (the other option being Oldfield Drive, which is an un-adopted road in a bad state of repair), there are also road safety concerns at the junction of Delavor Road to Thurstaston Road and Dee View Road, which is a dangerous junction without clear right-of-way. We have witnessed numerous 'near-miss' incidents at this junction over the years as the number of dwellings it is servicing has increased without any significant work on the junction. The narrowing of Thurstaston Road where it meets Dee View Road due to the rebuilding of a garden wall has added to the problems at this junction.</p> <p>An increase in traffic volume would also increase noise and disturbance to wildlife.</p> <p>Pipers Lane is also not amenable to public transport to service the increased volume of residents.</p> <p>Impact on landscape - The proposed development would be a negative impact to the local environment landscape which is open and supports biodiversity and wildlife in the form of badgers, bats, and birds. All type of animals exist on the proposed development sites. These statements refer to multiple objections made to developments proposed on Pipers Lane in the past by the Wirral Wildlife and Merseyside Environmental Advisory Service, specifically referring to bat roost potential, conditions to protect badgers, and conditions relating to breeding birds. Despite the protection being reviewed recently, those of us who live at this end of Pipers Lane still hear badger calls at night occasionally.</p> <p>Light pollution - The proposed development would increase light pollution. Currently there are no street lights past 77 Pipers Lane to the west, and the area is therefore naturally dark. Developing the end of the lane would increase light pollution having a negative impact to wildlife.</p> <p>Layout and density of building and capacity of infrastructure</p> <p>SP058E indicates space for 62 dwellings (referring to option 58.4 detailed in the Summary of Initial Green Belt Assessment September 2018). This density of dwelling is out of character with the surrounding area and will have a negative visual impact as viewed from Wirral Country Park.</p> <p>The proposed development would stretch capacity of infrastructure, such as road drainage systems, as currently the road floods in many places during heavy rain.</p> <p>The number of schools, especially high schools, of which Pipers Lane is in the catchment area is very limited and an increase in the volume of residents will put significant pressure on these resources.</p>
DOR00851	<p>I wish to express my deep concerns and objections to the Council's proposed allocation of a significant amount of the existing "Green Belt" for housing.</p> <p>I would make the following observations:</p> <ul style="list-style-type: none"> • Wirral is a very special and rare environment in which to live and its precious semi-rural character is dependent upon a relatively small amount of Green Belt land that provides a vital buffer in preventing the peninsula from becoming a more or less continuous urban sprawl, like so much of the rest of the country. • Even allowing roadside development along green corridors will have a dis-proportionately damaging impact upon the perception of the Wirral as a mainly urban area relative to the small amount of land that might be sacrificed. • "When it's Gone It's Gone" - The Council is the long-term custodian of our precious environment. Governments come and go, and Planning Policies are equally ephemeral, and often proved wrong with the benefit of hindsight. • The Green Belt has for years been protected from short-term ideological political expediency - Once it is built on there is no going back - it is lost forever to future generations. Developers have no interest in the long-term good of the local environment - they are simply interested in maximising profit from the most valuable (scarce) sites and in moving on to the next scheme. • The application by Central Government of a standard formula across the UK is completely arbitrary and takes no account of actual local population characteristics. Wirral Borough Council's own 2018 Compendium of Statistics estimates that the current population of the Borough (322,800) is relatively static and only forecast to increase by 1.2% to 326,900 by 2028 and by only a further 0.4% to 328,300 by 2038. The only certain thing about any statistical projection is that the longer the period forecast, the less reliable it is likely to be. Assuming that the Council's own current population projections are correct, where is this supposed pent-up demand for housing coming from? • Any homes developed on Green Belt land are likely to be built in or around affluent areas where buyers can afford them anyway and have no impact whatsoever on easing the problem of first time buyers or young families being unable to get on the Housing Ladder. • The Council should concentrate on encouraging development of "Brownfield" sites within existing centres that enjoy better access to existing amenities and transport links. • Building more homes is not the solution to the "Housing Crisis". It is well known that many new houses are bought by affluent investors as Buy to Let investments, actually taking them out of the stock of new houses for sale. The answer is to make Mortgage Payments more affordable for first time buyers through longer mortgage terms, discounted interest rates with some share of any profit

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	<p>on sale or some other initiative that central Government should be considering.</p> <ul style="list-style-type: none"> • Appropriate in-fill development of large garden plots would enable more intensive development within existing residential areas. • Peel's "Wirral Waters" scheme is not progressing and unlikely to do so unless some real pressure is applied by the Council for them to implement their existing Planning Consent which, would if it ever comes to fruition, would alleviate much of the alleged shortfall in the Wirral's future housing provision. <p>If these proposals to allow development of the Green Belt proceed, the Council's slogan "Wirral - A Pleasant Place to Grow" will be pretty soon have a tragic and irreversible irony.</p>
DOR00852	<p>I am shocked and puzzled by the council's attitude towards the green belt when a number of brownfield sites are available. The council should not be pandering to the builders who prefer green belt land rather than brownfield sites. Brownfield sites may be more expensive to build on but the benefits of using these sites and improving the environment far outweigh the additional costs. With regard to site SP010A; this is a working farm surrounding an important habitat for wild life. Any development on this land would put this habitat at risk. The farm supplies fresh milk to locals as an alternative to mass produced products. Further development in this area would also put pressure on schools, doctor and dentists. I therefore ask you to reconsider these far reaching plans.</p>
DOR00853	<p>" We are writing to raise strong objections to the proposals to include many greenbelt sites across Wirral in the Council's Local Plan for housing development. Greenbelt sites should only be used as a last resort. They should be cherished not destroyed.</p> <ul style="list-style-type: none"> • The number of houses proposed exceeds the actual number required by ONS figures. • Wirral currently has thousands of unoccupied properties that should be utilised. • Use the brownfield sites for redevelopment. To develop these brownfield sites would bring investment to areas of the Wirral where it is much needed e.g. Birkenhead & Seacombe. This would result in bringing affordable housing to people that need it and would also result in providing a better environment in these areas. • Building on greenbelt sites will widen the divide between the poor and more affluent areas. As only luxury housing will be built on greenbelt land. • Peel Holdings should be encouraged to utilise the land they have been banking for housing with immediate effect. • Building on greenbelt will destroy the unique character of the Wirral. Wildlife habitats will be destroyed. • Infrastructure and amenities in many proposed areas will not cope with increased number of residents. • The population of Wirral does not require this amount of housing. Recent population analysis data do not predict a boom to Wirral population. • Building on greenbelt should be a last resort. It should be treated as a precious commodity not as an opportunity to line developers' pockets. • Keep Wirral villages as villages. <p>Regarding Irby</p> <ul style="list-style-type: none"> • Irby should be kept as a true village. Joining Irby to Pensby, Thingwall & Greasy as proposed would make a huge urban mass. As Pensby already joins Heswall and Barnston is also down to merge too. • The local roads will not be able to cope. • There isn't enough spaces at the local primary schools • The local medical centre could not cope. • Irby has been allocated an unfairly huge proportion of the proposed sites (800+ houses) for such a small village. • Irby currently has a good mix of housing. It has a village atmosphere and community. This would be lost • The properties that back on to the horse field on Thingwall Road have small gardens at a lower level than the field. • Harrock Woods benefits from having open fields surrounding it providing a natural source of food for the wildlife that live there. <p>I trust that you will take into account people's views before you destroy this beautiful part of the world. I understand that extra housing is needed but all other options should be considered and utilised before green belt destruction."</p>
DOR00854	<p>"Please accept the following as my formal response to the Local Plan consultation:</p> <p>The Wirral Peninsular includes areas of outstanding natural beauty, and very importantly the areas currently designated as greenbelt contribute to the natural beauty of the area. It is my view that every effort should be made to build on brownfield sites, and bring empty properties into use before any thought is given to releasing greenbelt land for development. Once greenbelt land is released for development it is lost forever for future generations of Wirral residents.</p> <p>I understand that the Wirral Waters site, owned by Peel Holdings, has planning permission for over 13,000 homes, but Peel Holdings are delaying full development of the sites they own. Because greenbelt is so very important in maintaining the character and beauty of the Wirral, consideration should be given by the Council to using its compulsory purchase powers to purchase and then develop Wirral Waters to meet current and future housing targets, and as a result protecting land that is currently designated as greenbelt. Why should the profits of a large company such as Peel Holdings take precedent over protecting our precious greenbelt? Alternatively, perhaps Peel Holdings can be persuaded to speed up the development of the site as originally promised by them.</p>

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	<p>In relation to the greenbelt sites that have been identified for potential development, although I consider them all to be important, I have particular concerns about the "following proposed greenbelt sites:</p> <p>SP061 - North of Gills Lane SP062 - West of Barnston Village SP064E - North of Whitehouse Lane</p> <p>These areas of greenbelt form a natural gap between the settlements of Thingwall, Pensby and importantly Barnston Village, which is currently surrounded by open countryside. To build on this land would destroy the separation and character of Barnston Village, effectively merging it into other settlements and creating an urban sprawl, and for this reason it should be protected.</p> <p>Also, the road infrastructure in these areas will not support the significant increase in traffic that further development would inevitably bring. Barnston Road, leading into Arrowe Park Road, is already very busy particularly during morning and evening commuter times, and there are already long traffic queues on Arrowe Park Road down to the Arrowe Park traffic lights, and on Woodchurch Road leading up to the Arrowe Park traffic lights. Also, the ""Barnston Dip"" on Barnston Road past the Fox and Hounds "</p> <p>"Pub is very narrow and cannot take significantly more traffic. The Gills Lane junction with Barnston Road is already a very dangerous junction given its proximity to ""Barnston Dip"" and is not at all suitable to an increase in traffic.</p> <p>I am also of the view that the target set by the Government for development in Wirral does not reflect the actual housing needs, which are significantly lower. The population of the Wirral has remained relatively static over recent years and only a very small increase is projected over the period of the Local Plan. When houses are advertised for sale, they often take a long time to sell and this does not suggest that there is a great unmet demand for additional housing. The Council needs to challenge the targets set by Government for housing needs on the Wirral.</p> <p>In summary, everything should be done to protect from development the greenbelt land that we currently enjoy. The Wirral is a beautiful place in which to live, and development on our greenbelt would have a real negative impact on our Borough and the natural beauty of the Wirral. For the reasons stated above I urge our Council to do everything it can to protect this precious commodity. "</p>
DOR00855	<p>Re: Wirral Council's Overdue Local Plan</p> <p>Wirral's Green Belt, with its splendid views, walks and recreational areas, wonderful bio-diversity and the very distinct identities of its various communities, were key reasons why we and many other residents chose to live on the Peninsula and raise a family. Its time Wirral Council stopped blaming everyone else and delivered a Local Plan through a process which gives its residents real participation and reasonable time to determine what is needed and how it should fit in and around THEIR communities. Instead, there is an apparent determination to release Green Belt and calmly announced that developers and the Council see greenfield development as simple, quick and lucrative. This is just NOT acceptable. It is a flawed approach that must change.</p> <p>We understand that independent professionals, with a different objective and approach, have demonstrated there is NO need to release ANY Green Belt land to provide in a timely fashion even the original, inflates 'Housing Need' let alone the much lower requirement in line with the latest official growth forecasts.</p> <p>We therefore demand that the people are heard and that the current process is altered to allow proper involvement of Wirral's Residents, free from the present headlong rush, in order to ensure community identity and our glorious green belt are retained for the continued delight of Residents and Visitors alike, and more importantly for future generations to enjoy.</p>
DOR00856	<p>OBJECTION TO RELEASE OF WIRRAL GREEN BELT</p> <p>Wirral's Green Belt is precious – it is one of only fourteen nationally. I have the strongest objections to its release to housing developers. I take issue with release of all the proposed land parcels, those sites around the M53 corridor – SP 030 to SP 055 – are of particular concern for the following reasons:</p> <ul style="list-style-type: none"> • Wirral Council's own findings and recommendations in its Core Strategy for Wirral: Spatial Options Report 2010 <p>With reference to that report: Broad Spatial Option 3 – Urban Expansion, (specifically 3A Development of East of M53 Corridor) concluded that this option showed the least alignment with the Council's spatial vision and identified that that scenario necessitated additional controls on 7 of its 11 objectives: Social Inclusion, Transport Accessibility, Local Distinctiveness, Green Infrastructure, Countryside & Coast, Climate Change & Public Safety. The report also cited concerns of significant implications for the scale & pace of delivery of the wider economic, social & environmental benefits associated with regeneration at the heart of the urban area.</p> <ul style="list-style-type: none"> • The geographical uniqueness of Wirral <p>Wirral is the only metropolitan borough that is a peninsula. Bounded by water on three sides gives Wirral nowhere to spill – other metropolitan boroughs are able to expand into surrounding areas. Wirral's coastal heritage provides nationally and internationally important wild life habitats and needs protecting by those charged with the planning system.</p> <ul style="list-style-type: none"> • Wirral exhibits one of the sharpest gradients of rich & poor in the country and building on Green Belt does not solve the affordable housing crisis <p>Wirral has 10 areas (LSOAs) in Birkenhead and Wallasey in the bottom 1% most deprived in England (IMD 2015). The Campaign for the Protection of Rural England (CPRE)'s 2018 annual report finds that 72% of homes built on green field land within the Green Belt in 2017 were unaffordable by the government's definition. Development of Wirral Green Belt will render it a commuter dormitory of Liverpool, accentuating its already significant net outflow of daily commuters.</p> <ul style="list-style-type: none"> • Inadequate infrastructure – roads, schools, hospital capacity – to support expansion <p>In the last 5 years Merseyside has had a poor record on the roads – the number of children killed and injured on cycles were 3 times the national average and the number of pedestrians involved in</p>

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	<p>road traffic accidents were the worst nationally. More recently concerns have been levelled at Wirral Council over its road safety performance (wacm.org.uk)</p> <ul style="list-style-type: none"> • Reputational damage to Wirral's nationally recognised quality of life <p>Studies commissioned by the Centre for Economic & Business Research in 2015 & 2017 found Bebington to be the most desirable postcode in England based on “green spaces, employment prospects, good schools and affordable housing”.</p> <ul style="list-style-type: none"> • Protection of farmland and the provenance of Wirral produce <p>Wirral is developing as a “foodie” destination – it boasts a Michelin-starred restaurant (the only in Merseyside and Greater Manchester); award- winning butchers (including the UK Butcher Shop of the Year 2018) who rely on Wirral pastureland; superb farm shops which supply Liverpool's fine dining restaurants. Notable amongst these is Claremont Farm. Claremont is also establishing itself as a community hub with a thriving restaurant, evening social events, cookery schools and well-being classes. It is extremely concerning that it is the desire of the trustees of Claremont's land to develop certain portions currently protected by Green Belt. Such a move would threaten the viability of the farm, its eligibility for Environmental Stewardship and its ability to provide an educational role for the borough's schools.</p> <p>Moreover, I dispute the need and the strategy adopted by the Council, particularly:</p> <ul style="list-style-type: none"> • The requirement to build 12,000 homes over 15 years <p>The Strategic Housing Market Assessment (SHMA)'s “objectively assessed housing need” numbers are flawed – they are based on aspiration rather than need and result in unrealistic target numbers for local government. The assessment also ignores the specific needs of particular demographics e.g. older people who wish to downsize & younger people who wish to rent small flats, inflating the need to build additional family housing. If we were to assume two working adults in these 12,000 new households, that equates to an increased workforce of 24,000 – roughly equivalent to a new Unilever setting up and reaching its current employment numbers in the region every year for the next 10 years – at a time of full employment and when Wirral's population is at best static. That is not a realistic scenario.</p> <ul style="list-style-type: none"> • A figure of 12,000 new homes (even if required) could be met from development of existing brown field land <p>The CPRE's annual State of the Green Belt report (Aug 2018) finds that local authorities with Green Belt have enough brown field land for 720,000 homes nationally. Locally on Wirral, there are currently 5-6,000 vacant properties plus 6,000 planned by Peel at Wirral Waters alone within the Council's plan period – a tally of roughly 12,000 homes, the Council's target, satisfied by brown field.</p> <ul style="list-style-type: none"> • The focus for any additional housing should be on completion of existing planning permissions not on release of new land <p>The Local Government Association finds that the number of houses that remain unbuilt, despite receiving planning permission is soaring (up by 16% nationally in 2017 vs 2016), The target figures nationally and locally exceed the reach of the house building sector and are almost twice the number built in the economic boom of 2007. With increased targets nationally, more planning permissions are granted on green field sites but building rates remain the same. The result is no change to the number of new homes built but developers now have the choice of more profitable land i.e. Green Belt.</p> <ul style="list-style-type: none"> • The need to redefine Green Belt boundaries <p>Moving Green Belt boundaries is only meant to be done under “exceptional circumstances” (National Planning Policy Framework 2018, para 136). This strategic shrinking of the Green Belt, as a way of getting round its protected status, is as harmful as building on the Green Belt itself. In Wirral Council's latest proposals, the M53 is now being considered as a “durable feature” in contradiction to the additions made to its UDP in 2000. The net result is that, in effect, land to the east of the M53 – Storeton, Clatterbridge, Eastham, land parcels SP030-SP055 – will be consumed, ending up as “urban sprawl”. At a Council Development Options Review consultation meeting (10th Sept, Port Sunlight) a defence of this strategy was that a number of sites such as the Dibbinsdale, Eastham Country Park and various golf courses would “clearly not be built on” but were contained within the parcels of land generated by the methodology. The accompanying rationale was that “you can only ask once” for changes to Green Belt boundaries during a plan period, the apparent consequence being to propose a drastic loss of Green Belt land (nearly 25%).</p> <ul style="list-style-type: none"> • The basis of the methodology adopted in Wirral's Strategic House Land Availability Assessment 2017 and the validity of the “algorithm” to identify Green Belt parcels <p>The SHLAA 2017 applies criteria identified in the Methodology for Baseline Viability Report 2013 to the selection of Green Belt sites. The 2013 methodology was developed with Green Belt out of scope – the present application outside its original context is not valid.</p> <p>Consequently, key criteria within the methodology's three dimensions of Suitability, Availability & Achievability are skewed towards rating Green Belt land as highly attractive – “Suitability” scores are low when demolition is involved, favouring virgin land; “Availability” scores are high when there is a “willing developer”, which there reliably is for Green Belt sites; “Achievability” assessments were derived from the input of developers and estate agents – the parties whom the Council identified as stakeholders. With Green Belt in scope other bodies such as the CPRE would need to be included and other criteria developed.</p> <p>I question the approach and response of the Council to challenge also evidenced at the Development Options Review consultation meeting, 10th Sep, Port Sunlight:</p> <ul style="list-style-type: none"> • The level of assurance the Council requires from Peel to lock Wirral Waters' numbers & the measures being taken to secure this <p>The position stated was that a “better level of assurance is required from Peel to guarantee 6,500 before I can present this” to the minister responsible. The Council does not appear to have pro-</p>

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	<p>actively engaged with Peel to this end.</p> <ul style="list-style-type: none"> • A lack of vision and integrated regeneration plan <p>The gauntlet thrown down by Central Government could be the opportunity to put real fire under stalled plans for the regeneration of Birkenhead and environs (Settlement Areas 1-3). Some simple options come to mind:</p> <ul style="list-style-type: none"> • Dedicate the dock area to high density living. The current plan includes Belong Village, a low density dementia care home, whilst laudable is surely not the best fit if Wirral Waters is to emulate its Salford Quays cousin as a world class business, cultural & residential area. 25 years after the Quays' rebirth, Salford saw its property values rise faster than any other town or city (including London) in 2014 • Reverse Birkenhead's slide into a ghost town – this year has seen the closure of M&S with House of [council officer] likely to follow – by attracting residents back to the urban area where infrastructure exists. • Make creative use of the Council's CPO powers and relocate low value businesses (e.g. auto yards around Green Lane station/Queens St, CH41) into the industrial zones, freeing up residential land more in-keeping with the immediate neighbourhood • Rationalise Council satellites currently occupying generous plots (e.g. former school now Pensby's Children's Centre in Fishers Lane, CH61) into Birkenhead and concentrate its footprint in the urban area. Re-purpose surplus council land (e.g. former Town Hall complex in Bebington, CH63 which runs to several acres) into residential developments • Re-designate the large amount of car park space in Birkenhead (e.g. around Bridge St, CH41) as land for housing or relocated businesses • "Brown field is difficult" <p>The view the Council officer expressed that "...a lot of work has to be done to make that viable" does not convey a will to make it happen. The Council needs to make clear why that work will not be done rather than simply assuming it should not be done. The successful development of the former refuse site at Bromborough Pool into King's Hill is a great example of such a challenge being met.</p> <ul style="list-style-type: none"> • A lack of transparency <p>Proposing sites that contain land that "will not be built on such as Eastham Country Park" but are included because the parcel is churned out by the "algorithm", means that in reality the sites for consideration are fewer. The sense this conveys is that the Council and developers have their eyes set on a number of key sites, principally the M53 corridor, with the hope that the fact is disguised in the noise created by "decoy" sites.</p>
DOR00857	[SAME AS DOR00455]
DOR00858	<p>I am writing to protest against proposed building on our precious Greenbelt. I regularly use lever causeway and surrounding areas to walk my dog, keep fit and spent quality, free time with my family. I can't imagine the detrimental change that will be caused to the environment. Increased pollution and noise from traffic, congestion and damage to an important conservation area. Wildlife will be displaced by the destruction of prime agricultural land- never to be regained. You must consider what you are doing and consider the long term impact NOT short term rewards.</p>
DOR00859	<p>I wish to express my fierce opposition to the proposals put forward to release huge swathes of precious Green Belt land on the Wirral for housing development.</p> <p>The Green Belt is a vital space for the wellbeing of every citizen on the Wirral that should be cherished and protected for future generations. We live in an increasingly stressful world – only last week it was reported that Wirral NHS has one of the largest waiting lists for access to mental health treatment in the UK [(https://www.bbc.co.uk/news/health-45895541)]. There is significant and growing evidence on the mental health benefits of green spaces and yet Wirral Council is proposing that we build on yet more of our precious Green Belt space. What madness is this? [(https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/357411/Review8_Green_spaces_health_inequalities.pdf)]</p> <p>Wirral Council has a duty to all its citizens to protect and maintain our local green spaces. I cannot understand or accept why the Council is proposing to build on the Green Belt when there continues to be sufficient Brownfield site building opportunities elsewhere within the peninsula?</p> <p>Moreover, I feel that it is disgraceful that Wirral Council, its employees and elected representatives have taken so long to produce a new Local Plan, which appears to be based on questionable figures to satisfy unrealistic and overinflated targets.</p> <p>I chose to live on the Wirral and raise a young family here because of the beautiful green spaces that surround us. It makes me sad to know that this is now under threat and I am frustrated that the pleas of local residents to stop a new Local Plan being steam-rollered through seem to be being ignored.</p> <p>I implore that the substantial opposition of local residents is listened to and heard and that the current Local Plan process is altered to take into consideration the views of the people, in order to ensure that the Wirral Green Belt is retained for the continued benefit of residents and visitors, and more importantly for future generations to enjoy. It may be stating the obvious, but once the Green Belt has been built on, we can never get it back.</p>
DOR00860	<p>I would like to add my objection to the proposed reclassification of Green Belt land, especially in Eastham Wirral, for housing and industry.</p> <p>I object to urban sprawl of my local village, the increase in traffic, pollution and congestion.</p> <p>I object to the fact that green spaces will decrease, the destruction of trees and woodland will occur and there will be severe encroachment on the local countryside.</p> <p>Eastham had contributed enough to housing and industrial needs of the Wirral and the historic village especially should be protected.</p>

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	<p>I object to the fields at the back of Lowfields being built on when there is already planning to build on the Clifton Avenue flats area. Schools, local GP surgeries and walk in centres will become more overcrowded. Hedgerows, woodland and associated wildlife and plants will be destroyed.</p> <p>The places I specifically object to the reclassification of are:</p> <p>SP047 - South of Eastham Rake</p> <p>SP048 - West of Lowfields, Eastham</p> <p>SP049 - South of Mill Park, Eastham</p> <p>SP050 - West of Rivacre Road, Eastham</p> <p>SP051 - East of Rivacre Road, Eastham</p> <p>SP053 - St David's Road, Eastham</p> <p>SP055 - East of Ferry Road, Eastham</p> <p>SP054 - North of St David's Road, Eastham</p> <p>Also as a member of staff at Clatterbridge hospital I object to the reclassification of Green Belt at the following:</p> <p>SP040 - North of Clatterbridge Road</p>
DOR00861	<p>As a resident of Saughall Massie I am extremely concerned about the Local plan to build on Green Belt land and wish to strongly OBJECT to these outrageous plans.</p> <p>Why build houses on protected green belt fields when 'Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified' ?? There are plenty of brown field sites crying out for proper redevelopment and would support the need for housing in the UK.</p> <p>Intensive housing development around Saughall Massie would create even more traffic and associated hazards. The area has already seen devastating traffic collisions in the past few years with catastrophic impacts on local families including the death of a child, known personally to my partner. I myself recently suffered a crash due to the horrendous amounts of traffic currently in the area. Do we really want to increase traffic further and the likelihood of this happening again?? I for one do not and object wholeheartedly. Removing the green belt protection from our village would immediately cause huge encroachment into the countryside (one of the five purposes of having the green belt is to PREVENT this from happening.) Air pollution would also be increased and as a society committed to protecting our planet for the well-being and health of our future children, I believe this is something you have not considered, another reason I strongly object to your plans.</p> <p>Saughall Massie is a beautiful residential area with an agricultural character and landscape. My house backs onto the farm and looks at the beautiful fields and cows and to take this away from myself and other residents is an outrage!</p> <p>We have already lost part of our protected countryside to the new Fire Station being built - tell me why we should lose even MORE protected land when Wirral does not currently have a housing need that justifies releasing more green fields. Taking away our fields and closing down a family farm that have been here for years is unjustifiable.</p> <p>Your plans to build completely ignore ALL of the 5 purposes of the Green Belt and I cannot believe that it is in any way acceptable or justifiable to go ahead with your plans.</p> <p>Strongly object to your plans and take this opportunity to save the protected fields of Saughall Massie, it's unique agricultural character and heritage.</p>
DOR00862	[SAME AS DOR00455]
DOR00863	<p>As a resident of Saughall Massie I am extremely concerned about the Local plan to build on Green Belt land and wish to strongly OBJECT to these outrageous plans.</p> <p>Why build houses on protected green belt fields when 'Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified' ?? There are plenty of brown field sites crying out for proper redevelopment and would support the need for housing in the UK.</p> <p>Intensive housing development around Saughall Massie would create even more traffic and associated hazards. The area has already seen devastating traffic collisions in the past few years with catastrophic impacts on local families including the death of a child, known personally to myself. Do we really want to increase traffic further and the likelihood of this happening again?? I for one do not and object wholeheartedly. Removing the green belt protection from our village would immediately cause huge encroachment into the countryside (one of the five purposes of having the green belt is to PREVENT this from happening.) Air pollution would also be increased and as a society committed to protecting our planet for the well-being and health of our future children, I believe this is something you have not considered, another reason I strongly object to your plans.</p> <p>Saughall Massie is a beautiful residential area with an agricultural character and landscape. My house backs onto the farm and looks at the beautiful fields and cows and to take this away from myself and other residents is an outrage!</p> <p>We have already lost part of our protected countryside to the new Fire Station being built - tell me why we should lose even MORE protected land when Wirral does not currently have a housing need that justifies releasing more green fields.</p> <p>Taking away our fields and closing down a family farm who have been here for years is unjustifiable.</p> <p>Your plans to build completely ignore ALL of the 5 purposes of the Green Belt and I cannot believe that it is in any way acceptable or justifiable to go ahead with your plans.</p>

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	I strongly object to your plans and take this opportunity to save the protected fields of Saughall Massie, it's unique agricultural character and heritage.
DOR00864	<p>Please regard this as an official objection to the proposed planning permission for the development of Barnston Dale green belt area in Heswall.</p> <p>The current proposal diminishes our green belt which is in place to prevent neighbouring towns merging into one another, safeguarding the countryside from encroachment and assisting in the urban regeneration by encouraging the recycling of derelict and other urban land.</p> <p>Once established, green belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified - this is simply not the case in the Wirral!</p> <p>The development at Wirral Waters, which has planning permission for 13000 homes, along with Brownfield site availability and the 6000 empty dwellings that exist that could be brought back into habitable use will more than suffice the requirement of 12000 new homes by 2035. There is space for 18000 homes on Brownfield sites.</p> <p>The current council proposal fails to reflect the true housing needs in the borough and is fraught with misinformation and inconsistency. Again this renders the need to build on Barnston Dale and other local green belt sites null and void.</p> <p>Metro Mayor Steve Rotherham has pledged a Brownfield first approach to new housing developments across the city region, which includes Wirral. I urge the Council and Steve Rotherham to significantly increase their efforts to work with developers such as Peel Holdings to start development of Wirral waters and to use all the powers that they have at their disposal to ensure that such sites are completed..</p> <p>With the availability of Brownfield sites such as Wirral Waters there is no need to move the Green Belt boundaries and deny the enjoyment of outdoor space for future generations.</p> <p>In today's fast paced society it is becoming increasingly evident that time outdoors is not just beneficial but crucial for the health and well-being of children . The school which borders Barnston Dale Heswall primary benefits from playing fields which are extremely well used by the school and local clubs on a regular basis. The children love the fields and woods and it would be detriment to their health and well-being and their education for the preservation of wildlife and the appreciation of maintaining their environment if they were to lose their current level of green outdoor space.</p> <p>The current proposal is unnecessary with the resources already available within Wirral. It is wrong to make Wirral into a sprawl of concrete, while other neighbouring counties are still enjoying a much higher percentage of land at green space and countryside.</p>
DOR00865	<p>I would like to raise my objections to the potential building on greenbelt land in and around the Bebington area and wider Wirral as a whole.</p> <p>I currently work as a Plant Operations Director for a large multinational company and would like to use an analogy from the workplace as to why building on greenbelt is a weak and lazy approach to creating a short term fix, to a long term problem. It's weak and lazy because it chooses the easy, quick route which leaves further problems for the future, rather than making the difficult and hard work choices that would, however, make the future more sustainable and pleasant for everyone.</p> <p>If my regional director was to ask me to build 20% capacity into the site I run and promptly handed me £5M to achieve the task, the wrong thing to do would be to not question the motives or data he was using to request the capacity, but to simply get to work installing a new machine which would give me that capacity. Quick, easy, but ultimately weak and plagued with future failure.</p> <p>By installing a new machine I lose a lot elsewhere in the business.</p> <p>1) First and foremost I need to recognise that I am a leader of people and the mental well-being and motivation of those people is what actually drives profit in my business. I fail here on a number of levels if I just go and install a new machine. The people running the new machine may be contented for a while, until they begin to see my funding wasn't sufficient to give them all the services they need to run that new machine well, then recognise that all the other people I have running all my other machines become demotivated by the lack of investment into the rest of the site. All told, long term, I get a reasonably unhappy workforce in all areas despite my best efforts to give the business something shiny and new.</p> <p>2) I am unable to get the best out of the new machine if I'm not also given funding to improve all the other aspects of the project. Without improved warehousing, material handling, welfare (lighting, heating, cooling), services (boilers, water and power infrastructure improvements), I can't get the best out of that machine and it begins to fail on its promise of 20% capacity. It does this because if I can't get the materials to and from it fast enough, nor provide it with the right services to function well, it begins to produce inferior quality and customers ultimately choose not to order work from that machine. The only way to combat that is to then run low margin work just to use that new machine capacity.</p> <p>Ultimately, the best approach would have been to choose the hard way out of the problem. Use the funding to help me understand the root cause of my poor capacity in the first place, use the money to systematically address performance issues in the older plant and invest in / update the infrastructure which has been neglected and is the reason for the capacity loss. If I took the hard decision to fix the bigger issues, I'd find I'd have a happier workforce, they would have been part of the solutions, they would have seen investment in their older machines and infrastructure and the effort put in would achieve the capacity increase needed without just slapping in a new machine then brushing my hands off and walking away from the problem. Your solution to build on green belt is so similar to this work analogy. Opening up large quantities of greenbelt to stick a plaster on a bigger issue is not the cure and by doing so, you open the area up to a plethora of other problems and systematic failure.</p> <p>Once you build on that green belt to satisfy the request of your superiors without challenging the reasons why or sources of data, you create a permanent scar on the country that can never ever be reversed. Greenbelt is finite. It will only ever diminish and you have the power and responsibility to protect it by choosing the hard fixes, not the easy fixes. Please remember this.</p> <p>If you build on greenbelt you will :</p>

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	<p>1) Lose the well-being and motivation of your people. People in the new homes will quickly become unhappy when they realise the road networks, services, bus routes, waste facilities and emergency services have not been addressed to look after their long term well-being and will either be unhappy and stay, or look to move again long term, driving people and money away from the area. The transport links in the areas are already at saturation point, in peak times I can sit in traffic for 30 minutes to travel 1 mile, what do you think that will be like with another ten or twenty thousand cars in the area? Don't even get me started on crime rates and police resource.</p> <p>2) Add to this the wellbeing of the people already in the area. Those of us who treasure the greenbelt will become unhappy at the loss of their recreational space and landscape which attracted us here in the first instance. We too will either choose to stay and be unhappy because we have no other choice, or again, you risk driving people and wealth out of the area.</p> <p>3) The third group of unhappy people are the ones where the majority of the housing problem lies, social housing. By not addressing the many thousands of abandoned homes, rent hikes on the underprivileged which forces them out of their homes and deeper into poverty, by not addressing police funding and anti-social behaviour in those areas and instead ignore it, hoping a clean slate will fix what you can't find the energy to fix. It won't work and those socially deprived areas will also feel worse off as they see you invest in something else when you should have put energy into fixing the root cause instead. It seems totally wrong that I can drive down street after street of empty boarded up housing and yet you are now suggesting to build on fresh green belt instead of dealing with these empty properties.</p> <p>All told, this is simply a bad decision. By doing this, you diminish the quality of the area and just like the work analogy, you drive people away and the overall house value with it. The region becomes less affluent and you lose as a council because of it.</p> <p>You also have to recognise the class divide you instil by managing land the way you propose. With most of the greenbelt land to be used coming from the east side of the M53, you can clearly see how one side of the motorway will become poorer and less appealing, while the other side becomes more affluent and attractive. I don't understand why council would wish this on its area and contribute to class division. Ultimately, I plead with you to do what you are here to do. Make the hard choices, do the difficult work, fix the root causes, invest in where it's failing, tackle the empty urban, brownfield and industrial areas we drive past every day and make those areas work to meet your quota.</p> <p>I would just add that I work on the waterfront along with a large portion of Peel Holding land. The buildings next to my place of work have remained empty and derelict for decades. These buildings are completely left to rack and ruin are a scar on the landscape and a huge health and safety concern. These buildings are literally falling apart and prime for development. Can we honestly say that we have applied the due diligence and required pressure on businesses like Peel to either compulsory release their land for the greater good or encourage development negotiations in the interest of both government housing and Peel Holdings as a business. My fear is that again we have taken the weak and easy route out of that debate and we choose not to challenge the huge quantities of land that Peel Holding have, because we are weak and we don't have the people's wellbeing in our hearts. It feels like we always want the easy route out, regardless of the future cost.</p> <p>With an improved system and process to tackle the real issues, you create sustainability for the future, you improve the well-being of your area and the people in it because we see you invest in the years of neglect, rather than to continue to neglect it and build new, hoping the old problems will go away.</p> <p>Please don't choose the easy option and build on greenbelt. There's no going back once you've ruined it and it won't fix the long term problem of housing. Keep the greenbelt intact for all of us and our future generations to come. We owe it to them to work on the difficult choices, not the easy ones that might make their lives worse than ours.</p>
DOR00866	<p>I oppose the greenbelt land being built on to the extent suggested for a number of reasons, they are as follows. I believe it would endanger wildlife around the area, we are supposed to be planting trees hedgerows etc due to the greenhouse effect not cutting them down, the roads are already congested increasing amount of homes will create huge amounts of congestion population etc; the increase in population will result in already overstretched emergency services let alone spaces in hospital beds, we only have one A&E. Supposedly affordable homes being built is myth, the proposed areas will not create affordable homes they will be far too expensive for the average families. I think there are far more suitable places to build around Birkenhead that would result in affordable homes, when travelling around Wirral the amount of derelict buildings that can be seen is evidence of this if we are desperate for housing why don't we build up to date flats around areas where the infrastructure such as roads shops are already in place this would save time and money in building roads shops schools etc, I think that there is more money to be made by the council/authorities in taxes if the proposed areas are built on and this is real reason of the proposed build.</p>
DOR00867	<p>Subject: SAVE THE GREENBELT</p> <p>I write with very grave concerns regarding the development and building on Wirral's greenbelt Land, and the devastating proposal by Wirral Council.</p> <p>The main purpose of the Greenbelt Policy is to protect designated land around large urban centres from urban sprawl as well maintaining the areas of forestry and agriculture, also providing a habitat for wildlife. It stops increased car use, also stops the neglect of brown land sights and dilapidated buildings. Greenbelt also includes significant local biodiversity - the variety of plants and animal life which is considered to be of great importance. It also protects heritage sites. Its trees, plants and open spaces soak up our carbon emissions as well as providing recreational space.</p> <p>Without greenbelt land our villages and towns would merge thus losing all identity.</p> <p>Two thirds of our greenbelt is agricultural land and is being depleted at an alarming rate. We are losing almost 7 dairy farms per week in England and Wales. This must stop. We only produce two thirds of our food in the UK and with leaving the EU we should be more efficient.</p> <p>The current tenants of Greenhouse Farm, Greasby, are the second generation of tenants. The Farm has been passed on to them from parents who originally took the farm on in 1961. A lot of loyal staff are employed on the farm with a wealth of experience.</p>

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	<p>The wildlife on the farm is rich and varied. It has no voice but ours. There are Owls (Barn, little and Tawny). Common and Harvest Mice and Shrews. There is also an abundance of Sparrows, Robins, Wrens, Tits, great flocks of Starlings, Chaffinch, Greenfinch, Rooks, Crows, Magpies, Cuckoos, Pheasants, and Herons. Berwick's swans and little egret seem to use the land as a resting place. There are birds of prey including kestrels, Sparrow hawks. Swallows and House Martins come in their droves every spring from wintering in South Africa to their nests on the farm to breed and feed. Other wildlife present on the farm includes Frogs, Toads, Newts and Foxes. At dusk there is an abundance of Bats.</p> <p>Greasby is one of the oldest settlements in the country, originally called Gravesberie rich in heritage and artefacts, relics have been found in a copse of trees on the Above farm land dating back to 8500BC. Now on show at Liverpool Museum. This is the land due to be developed with plans for 534 homes, and just a ring fence to protect this precious site! Absolutely scandalous.....we also do not have the infrastructure to support this. Our GP's surgeries are full, same day urgent appointments now impossible to get. All local Primary Schools are oversubscribed and Arrowe Park Hospital cannot always meet with the 4hr A&E targets and is regularly working at full capacity with non-urgent operations and procedures being cancelled.</p> <p>We have heard sufficient statistics to know there is enough brown belt land and empty property to meet with the Government's requirement of houses to be built. There is space for 18000 houses on Brownfield sites on the Wirral, of which Wirral waters, Peel group can deliver as written in their recent letter to Wirral Council. Yet developers are lobbying the council to release land from Green Belt for house building. There are also over 3000 plus empty homes on the Wirral. The number of required houses has since been revised and is considerably less than first quoted.</p> <p>At a meeting at the Greasby Community Centre a worker who deals with people who are homeless or who live in poor housing in Birkenhead, said the type of houses they are proposing on greenbelt will be far too expensive for the people who need them. The Council needs to build affordable homes in affordable area like Birkenhead which will improve the area and facilities on brownfield land. But the proposed developments on Green Belt land will be executive homes, as this is prime land, commanding a high price. Of course developers will be queuing up to get in on the act.</p> <p>At that meeting the 4 Political Parties local candidates, Labour Conservative, Liberal Democrats, and Green Party, were of one voice. Also everyone at the meeting on a show of hands said a resounding NO to any use of Green Belt Land on the Wirral.</p> <p>I urge you to be responsible and think again.</p> <p>You are elected servants of people who put our trust in you to do the right thing. These are People's lives you are dealing with causing a lot of misery and anxiety. What you are proposing will rip the heart out of the Wirral. This proposal is very clearly driven by money, as per the meeting at Wallasey Town Hall 8/9/18 which was attended by hundreds of Wirral residents. Please do the right thing for Wirral and DO NOT let this proposal go ahead.</p>
DOR00868	<p>I'm writing in response to the proposed development on the green belt land on the Wirral - most specifically at Barnston Dale and bordering Heswall Primary School. I would like to raise my objections to the proposed development of the green belt land for the following reasons:</p> <ul style="list-style-type: none"> • The roads around the school are already beyond their capacity during school drop off and pick up times - they are narrow roads, not designed for the volume of traffic that they are presently experiencing and on occasions the safety of our children has been compromised with cars parking on the pavements and on corners in order to allow the traffic to continue to flow. • The presence of construction traffic during the recent small development of 3 dwellings near the school on Downham Road North contributed to the compromised safety of our children - large construction vehicles were often present and had to pass across the pavement on a common route to school for many of the children. Construction vans were consistently lined up in rows of 4 or 5, all parked up on the pavement so that our children, parents and grandparents, especially those with pushchairs, were required to step into the road and therefore risk their safety • In today's fast paced society it is becoming increasingly evident that time outdoors is not just beneficial but crucial for the health and well-being for our children. The school benefits from playing fields which are extremely well used by the school and local clubs on a regular basis. The children love the fields and woods and it would be a detriment to their health and well-being if they were to lose their playing fields and green outdoor space. • In present state, Heswall Primary school, being the closest school to the proposed development, is already at capacity. What plans are in place to provide schooling for the extra children which the proposed development on Barnston Dale would inevitably bring. Are there plans in place to provide extra amenities such as doctors surgeries and hospitals too • last winter, routine operations were frozen at both Arrowe Park and Clatterbridge for an extensive period of time due to inability to keep up with emergency requirements - what would happen if there were even more families in the area requiring these services. Do we have the policing resources to cope with a population increase in the local area? • It has been suggested that the dwelling requirements in Wirral for the next 15 years should be downgraded due to the recent figures released by the Office of National Statistics and in light of this new information can the council give an undertaking that green belt boundaries will not be redrawn. • The development at Wirral Waters, which has planning permission for 13000 homes, along with Brownfield site availability and the 6000 empty dwellings that exist that could be brought back into habitable use will more than suffice the requirement of 12000 new homes by 2035. There is space for 18000 homes on Brownfield sites. • The current council plan fails to reflect the true housing needs in the borough and is fraught with misinformation and inconsistency. Again this renders the need to build on Barnston Dale and other local green belt sites null and void. • The current council plan fails to meet the urgent need to regenerate and direct investment into the urban areas away from green belt. • The current council plan diminishes our green belt. Greenbelt is in place to prevent neighbouring towns merging into one another, safeguarding the countryside from encroachment and assisting in the urban regeneration by encouraging the recycling of derelict and other urban land. Once established, green belt boundaries should only be altered where exceptional circumstances are fully

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	<p>evidenced and justified - this is simply not the case in the Wirral!</p> <ul style="list-style-type: none"> • Metro Mayor Steve Rotherham has pledged a Brownfield First approach to new housing developments across the city region, which includes Wirral. I urge Wirral Council and Steve Rotherham to significantly increase their efforts to work with Developers such as Peel Holdings (who own Wirral Waters) and to use all the powers that they have at their disposal to ensure that such Brownfield sites are brought forward for development. With the availability of Brownfield sites on Wirral there is no need to move the Green Belt boundaries and build on the very land that makes the Wirral what it is. <p>Your current plan is so unnecessary with the resources already available within the Wirral. It's unnecessary to make Wirral into a sprawl of concrete, while other neighbouring counties are still enjoying a much higher percentage of land at green space and countryside</p>
DOR00869	<p>We strongly object to any building on land that is currently green belt on the Wirral. We feel that the whole character of the area around Lever Causeway will be changed by unnecessary development that will increase air and noise pollution (affecting people's health) due to the increased traffic. The traffic is already very heavy in roads like Mount Road. Wildlife will be devastated, including buzzards who hunt in this area (as well as red kites, which we have spotted recently .) The semi-rural environment of Higher Bebington favours a variety of wildlife which would be drastically reduced. Higher population of residents will lead to an increase in visitors using Storeton woods increasing pressures such as further soil erosion and habitat destruction. The physical nature, history, and character of the area will be profoundly changed to a more heavily urbanised area leading to a degradation of the environment for the local residents. Development of existing brown field areas on the Wirral would be more beneficial, improving those de-industrialised areas so negating the need for unnecessary development in Higher Bebington and the green belt. Developers would prefer to build expensive executive houses in the green belt because that is more profitable rather than on potentially polluted land elsewhere and so allow them to justify not building affordable housing where it is needed.</p>
DOR00870	<p>I object to the local plan on the following grounds</p> <ol style="list-style-type: none"> 1. There is sufficient land in urban areas to build on - the council needs to prioritise working with Peel Holdings to ensure that they build the developments that they had undertaken to do. This should be a council priority. 2. 12,000 homes are not needed - the population is in decline - the only increase is for suitable housing for older people who want to live in an area accessible to shops and utilities- not in semi-rural areas. 3. The sites either side of Lever Causeway are huge - this is a historic site of interest and makes a lovely walking / cycling route between East and West Wirral. Developing this area will cause unrestricted sprawl and merge the district areas of Higher Bebington, Prenton and Storeton. 4. The elevated position will destroy the views from the motorway which are currently green and pleasant. 5. The overall allocation of land to be developed is disproportionately biased in favour of West Wirral. 100% of the green belt land to the East of the motorway could be built upon. This does not support the delivery of the Wirral Plan which focuses on 'narrowing the gap'. How is this fair? People living in Rock Ferry or Birkenhead will have to travel a significant distance to see a green vista which is acknowledged to be good for mental health as well as providing free facilities for exercise.
DOR00871	<p>The Wirral is blessed with beautiful countryside , that has as long as I have been alive , been the envy of many , we have the coast line , with many shore areas , that give us the chance to enjoy the freedom to walk , play , participate in sports . We also are close to 2 cities a plus for shopping and sightseeing for visitors . But mostly we have our greenbelt areas . As we drive we can appreciate the changing hedge rows , and the changing colours of the fields , from crops and grass . How lovely is it to be held up by the cows being taken in for milking and out to grass in the spring . The later bit raises a question , we as a country are holding our breath to see where the future will take us . As far as I am aware we as a country buy milk from other countries , not to mention crops [next time you shop , I ask you why do we import so many veg when , we have the land to grow our own] . We really should be forward thinking , we will still need cows , and land for crops especially if the powers that be go ahead with the plans . WE can't afford to lose this natural space .</p>
DOR00872	<p>I object to the release of green belt land to build new houses.</p> <p>What is the point of land being in a green belt? I was under the impression that it is to remain green, i.e. not built on.</p> <p>The amount of land to be taken is too much.</p> <p>I hope Wirral Council can persuade the government to reduce it as it will be a great loss to the community.</p>
DOR00873	<p>We object to the release of the Green Belt area of Lever Causeway, Mountwood, and Bebington for building development.</p> <p>The Green Belt classification has ensured that this area of natural beauty remains intact and provides an ideal area for exercise, relaxation and an atmosphere that has drawn many people to the area. It is also the reason for ensuring the type of lifestyle enjoyed in the Wirral, instead of being consumed by a "concrete jungle"- which is unnecessary.</p> <p>There are several other locations that are suited for development that could still fulfil the quotas required for new housing and to ensure that the green belt area remains protected into the future and allow more people to enjoy it.</p>

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	We are keen to protect the natural heritage (as well as prime value!) of the area.
DOR00874	<p>Object to any plan that allows building on Green Belt land on the Wirral Peninsula.</p> <ul style="list-style-type: none"> • Green Belt was introduced to stop urban sprawl and prevent towns merging together. • It allows the population to enjoy the countryside and fresh air. • Historic towns and villages should be kept separated to preserve their character. • Green Belt ensures more urban sites are developed first including brown field sites and derelict houses refurbished. <p>Building firms (including Peel Holdings) must be forced to build on the land they already own, including brown field sites. If they refuse, then the land should be compulsory purchased at a reduced price by the council and resold to a firm who will complete the build.</p> <p>Peel Holdings seem to be blessed with support from local councillors which enables them to do anything they want on the Wirral! They need to build on their Dockland site as proposed. This would produce all the homes required under the national plan.</p> <p>Any extra housing around small villages will inevitably put a strain on local services and roads. All of which are already straining to cope with the current population.</p>
DOR00875	<p>Strongly object to the council plans to build on green belt land on the above. According to the Governments own National Planning Policy Framework “Green Belt boundaries should only be altered where exceptional circumstances are fully evident and justified” The recent approval and build of the new Fire Station in the vicinity was an ABOMINATION and completely flouted these rules despite absolutely watertight reasons against it. Do you know we were called “snobs” for objecting by the local labour councillors at the planning meetings my husband and I attended at the Town Hall? What kind of people are we up against here? Have you seen the fire station site?! Please do not let it happen again. Let the developers may more for developing the plentiful brown field sites, I am sure they can afford it.</p> <p>My family and I live [in local area]. One of the reasons we bought the house was that [family members] suffer from chronic asthma and by removing the Green Belt protection from our village would immediately cause huge encroachment, additional traffic on our already busy roads (which people use as a cut through - I am sure the fire engines will do also, very dangerous). All this will increase air pollution which will be detrimental to our condition.</p> <p>We also believe that it would be difficult to sell our house and may also decrease the value. We bought this house as an investment for our future, having paid significant amounts of taxes (at the higher rate!) all our lives.</p> <p>When is all this going to stop? How much longer do we have to fight to live quietly and comfortably in our own house and to ensure common sense prevails?</p> <p>Please do not let any of this go ahead around the fields of Saughall Massie.</p>
DOR00876	<p>Objections to the potential building on Lever Causeway Green Belt land (SP030). My reasons for this are as follows;</p> <ol style="list-style-type: none"> 1.) There is sufficient land in urban areas to build upon which should be being utilised first. 2.) The population projection does not warrant for 12,000 houses. We do not have the infrastructure for jobs, schools and local transport to warrant this many houses. 3.) It will spoil the character of the area. 4.) Lever Causeway and its open spaces provide an area for relaxation and exercise for innumerable local residents as well as wildlife. You agreed to build the path that now runs down Lever Causeway which many people use for exercise and just general walking enjoying the views. Lots of dog walkers use this path too. Lever Causeway fields are home to an abundance of wildlife including; moles, pheasants, foxes and birds. To destroy their homes is completely unnecessary. 5.) Unrivalled views will be destroyed, irreparable damage to its setting. 6.) Increased traffic and major congestion. I cannot understand how this will be managed as mount road and the roundabouts at the top of Lever Causeway are already very busy. 7.) Acres of prime agricultural land of arable use will be lost. 8.) Damage to Mountwood Conservation area adjacent. 9.) The sites either side of Lever Causeway are huge. Once released from Green Belt, building could extend to Storeton village, causing unrestricted sprawl, with historic Storeton and Bebington merging. 10.) Use the Wirral's already empty 5,000 properties and the already existing space on brownfield sites for 18,000 homes. 11.) There is an error in your Summary of Initial Green Belt Assessment September 2018. On page 52 the agricultural land use for SP030 has been classed as pasture and horse grazing. In fact, the land under SHLAA1819 on site SP030 is actually used for farming arable, and has been for many, many years. Recent soil reports show the site as containing very good quality soil. SHLAA1819 has already had a crop harvested this year and is currently growing winter wheat. The land further down Lever Causeway between Marsh Hey Covert and Little Storeton Village is also being farmed. Therefore a very large proportion of SP030 is actually used for arable farming and not horse grazing as indicated. At a Council Meeting on 15 October, Motion 3 was voted on and carried unanimously. The first paragraph of this motion reads, "This Council requests that renewed importance should be attached to the protection afforded to agricultural land as the responses to the Local Plan are considered. Land that is currently in productive agricultural use should not be removed from the Green Belt in view of the need to safeguard future food supplies."

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	Also, as this parcel of land abuts Marsh Hey Covert, and covers an area between Marsh Hey Covert and a copse behind Stanley Avenue, the notes should also include that the area may include supporting habitat, as there is evidence of badger activity, owls and bats in this area. The areas also give protection to other local wildlife whose natural habitat will be eroded by any development.
DOR00877	<p>The Green Belt in Wirral should NOT be built upon. As an Irby resident I was horrified to discover the number of Green Belt areas very close to my home that had been identified as suitable areas for redevelopment. I was further disgusted to find out that in the ward of Greasby/Franky/Irby, 4 out of the 5 identified areas of Green Belt land were in Irby alone. As a Wirral resident for the whole of my life I have chosen to remain in the local area, to work in the local community and have my family here. I chose to live in Irby with my family as it is a small close-knit community, in an area surrounded by green fields providing my family and I with immediate access to the outdoors. This will be destroyed if the area that we use for family exercise, relaxation and fresh air is removed forever. My garden is a haven for local hedgehogs, bats and owls and I fear these animals would be lost forever in the local Irby environment if ANY Green Belt land is redeveloped. As a nation we are suffering from an obesity crisis, so removing any local areas of Green Belt that are currently used for exercise and health benefits will only lead to an increased pressure on the already stretched local NHS services. BUILDING ON IRBY GREEN BELT LAND MUST NOT HAPPEN. Currently the villages of Irby, Thingwall, Pensby and Heswall are separate, with each having its own very different and unique feel. I bought my house in the Irby area solely, and NOT as part of a larger local area. If I had wanted to live in any of the other separate areas I would have bought a house there. I resent that I may be made to feel part of a much larger area if the local Green Belt is built on and all these areas become joined. Building on these Irby Green Belt areas goes completely against point 2 of why we have areas of Green Belt land – to keep the separate identities of towns and to stop individual towns from merging.</p> <p>The Green Belt areas identified for redevelopment in Irby could theoretically have over 2,000 homes built on them. Irby does NOT have the amenities to support an increase of possibly 5,000 – 10,000 people as it is a small community. It has only 2 primary schools – 1 of which is C of E aided, full to capacity and with a religious based entrance criteria. Neither schools have the capacity to take many more children. There is only 1 secondary school that is already popular and in demand by families both within and outside the local area. Irby village has NO doctors or dentist's surgeries. Parking in Irby Village is extremely limited and the village becomes extremely congested at the weekend. Parking is often dangerous and creates limited clear access through the village. The main road through Irby village is busy and dangerous, and at peak times it is very difficult and challenging to drive through. I worry greatly about the safety of primary and secondary school children, and their families walking through Irby village during peak times</p> <p>Building any new houses on the Green Belt land in Irby will NOT create the affordable housing that Wirral council insists that it needs.</p> <p>The wider local area, that includes – Gayton, Heswall, Barnston, Brimstage, Pensby, Thingwall, Irby, Greasby and Frankby have no access to Council leisure facilities - that include swimming pools, fitness suites and indoor sports halls. It is unacceptable to increase the population in these areas without having the ability to provide adequate facilities for the local residents. Wirral is a unique area with a geography that is completely different to that of any other part of the UK, with many areas being of significant archaeological interest. As such, it's needs should not be determined by a government based in London, who have no realistic understanding of the actual needs of our local area, but by the local community of Wirral. It has now become apparent that the initial government estimates of the need for Wirral to build over 800 new homes per year (12,000 homes over the 15 year plan span) were wildly over inflated, even exaggerated, and that in reality the realistic figures are more like 500 homes per year (7,500 homes over the 15 year plan span). The initial figures were over exaggerated by both the ONS and Wirral Council. As a council Wirral should stand firm AGAINST the need to build any houses on Green Belt land.</p> <p>It is completely unnecessary to release ANY Green Belt land to be built on. There are plenty of disused, run down houses and other council owned properties that can be upgraded and released back into the housing stock. Wirral council need to be upgrading far more than the 200 per year that has been quoted as the number they are managing to add to the local housing stock each year. Wirral council seems to recently have adopted the policy, in whatever it introduces (recent parking charges at beauty spots around Wirral), to: – initially overstate the case, then draw back from initial figures/charges, and finally claim credit for changes being better than were originally planned, but have still been implemented to some degree. Wirral council MUST accept that the need for detailed planning consent for 6,500 homes on Wirral Waters is actually NOT needed for these housing figures to be included by the council. The 2017 Appeal Courts Ruling states that developments need only be 'reasonably possible', not even 'probable', and certainly not 'certain' of proven deliverability. If these figures are included by the council then NO Green Belt land should be allowed to be redeveloped. The council MUST apply this ruling.</p> <p>We are at a turning point for this council's success. The council needs to listen to the views of its residents, think VERY carefully about the legacy they are creating for our communities and ensure that the Green Belt land the council was originally determined to protect, remains free and undeveloped for generations to come.</p>
DOR00878	Concerns about immigration living in a country where the roads are constantly congested, where the NHS cannot cope with the number of patients that use it, where schools are overcrowded, where the police can no longer protect us, where there is (apparently) a housing shortage. We do not need our green belt defiled
DOR00879	<p>Objections to the proposed plans for building on the Green Belt .</p> <p>In particular either side of Levers Causeway, Storeton Village and along the ridge of Mount Road taking in Storeton Wood, Jack's Wood, and Brackenwood golf course</p> <p>Wirral doesn't need the urban sprawl of 12000 houses .</p> <p>There is sufficient land in the Urban areas including brown field sites and Peel Holdings who should be made to up hold their planning application.at Wirral Waters which increased substantially the land value. The area will be fundamentally changed. The area of Levers Causeway, Storeton Woods a Brackenwood Golf course and Storeton Village area is used for recreation. There would be a loss of visual amenity. There sites of historic important ,Storeton Hall (Grade 2 * listed unique medieval building),existence of an Anglo Saxton settlement in Red Hill and the battle of Brunanburh</p>

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	<p>and the historic tramway in Storeton Woods. Increase traffic. Loss of large amount of agricultural land.</p> <p>We owe it to our children and grandchildren to preserve this. If we don't they will ask why we allowed to happen and what we did to prevent it.</p> <p>[Poem cited]</p>
DOR00880	<p>Argue that a managed increase in housing density rather than using green belt land can satisfy an increase in demand for housing in Wirral:</p> <ul style="list-style-type: none"> • Using green belt land for housing is a political decision as is changing the housing density in Wirral • Once green belt land has been developed, it is gone forever; an approach that focusses on increasing housing density offers a more flexible approach, if not necessarily an immediate short-term solution • The detail behind population growth impacts the type of housing required in future years • The variability of population growth over the next 15 years could mean that the expected demand does not materialise, especially given the unpredictable impact of both major global macroeconomic and local economic issues. <p>The Review indicates that 12,000 homes are required to be built in a 15-year period, approximately 800 per annum, from now until presumably 2034.</p> <p>Population trends published by the Office of National Statistics indicate approximately 330,000 people on Wirral in 2034.¹ There is some variation in the estimates that have been produced in 2012, 2014 and 2016. 2018 forecasts are not available yet, but the difference between the highest and lowest estimates is about 1.1% or 3,500 people. The composition of the population, though, is changing over time. The following charts indicate the fastest growing group represents people over retirement age (>65) with over a quarter (27%) of Wirral's population belonging to this group by 2034.² Analysis of the types of family groups indicate that single person households have the largest growth (an increase of 14%).³ This is reflective of overall trends in UK population change with an increasing proportion of elderly retired people, many of whom will become single person households. The family groups that represent the employed and consequently wealth generators for the Wirral are either in decline or at best static over the next 15 years. Based on the central government increase of 800 dwellings per annum, the forecast number of dwellings on the Wirral for 2034 is approximately 166,000. This gives a figure of 2.0 people per dwelling in 2034 compared to a current average of 2.14 for 2017.⁴ It is also interesting to note that the 1.1% variation in population mentioned earlier is equivalent to approximately 1,800 dwellings (i.e., 2¼ years' housing growth) if we assume an average of 2 people per dwelling. The rise in the number of households over the next 15 years therefore appears to be generated by the demand caused by an increase in predominantly single retired elderly people.⁵ While there is no expectation that all of this group may be willing to vacate their own properties that they may have lived in for many years, the demand for housing is likely to be for smaller, more compact and manageable properties, rather than the continuation of growth of housing for larger, younger families. An increasing number of elderly people may also require assisted living support, reflected in a 36% increase in Wirral's institutional population over the next 15 years.⁶ Wirral's population growth is rising due to an increase in the more vulnerable and less mobile section of the population. Development of "edge of town" housing filling in areas that currently represents green belt land does not seem to meet the requirements of the group that generates this expected rise in population.</p> <p>Green belt development will be further away from those urban centres that hold access to shops, medical facilities and public services, as well as the already established bus and rail routes that are most often frequented and needed by this section of the population. The lack of transport infrastructure means that green belt development leads to more commuting and to more isolated communities. The requirement for individual travel by car becomes increasingly more difficult for this group of people as they age. The issues of car parking restrictions and car parking charges in Wirral are already well known to residents. Advocating a policy that requires even more car journeys appears perverse, especially as it generates even more air pollution.</p> <p>[Graphs & References added]</p> <p>Wirral Council has published a set of responses to FAQs to support its Development Options Review, one of which states: "Increasing densities over those already built into the calculations would be likely to have a detrimental impact on the character of existing urban areas of Wirral which are not already protected by existing density controls or heritage designations like conservation areas." The responses to FAQs also state that: "National planning policy sets out five purposes for including land within a Green Belt:</p> <ul style="list-style-type: none"> • To check the unrestricted sprawl of large built-up areas; • To prevent neighbouring towns merging into one another; • To assist in safeguarding the countryside from encroachment; • To preserve the setting and special character of historic towns; and • To assist in urban regeneration, by encouraging the recycling of derelict and other urban land." <p>The statement "likely to have a detrimental impact on the character of existing urban areas of Wirral" attributed to increasing housing density can be applied equally as effectively to the use of green belt land. Building housing for the most senior groups on the edge of urban areas is likely to cause problems in accessing services that are at least a couple of miles away and would require either car journeys or more extensive investment in public transport services. Wirral appears not have any plans to extend or increase the local bus network, especially given the reduction in central government subsidies for public transport. The requirements of an increasingly elderly population are for more convenience and less travel. The use of green belt land and the resulting "urban sprawl" does not seem to meet these requirements. If housing density were to increase, this would meet the likely demand for smaller homes with fewer rooms per house. This does not mean that</p>

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	<p>that many large blocks of apartments or flats are the solution. There are studies that have formulated the advantages of increasing housing densities in a managed way., although the references are not meant to be an exhaustive or necessarily representative list. The council and its planning officers will have access to a wider variety of information on this topic, but the rejection of increasing housing density appears to ignore the possibility of meeting some of the requirements of the population for access to local infrastructure and improving community cohesion. The average density of residential addresses surrounding newly created residential addresses for Wirral is 28.8 addresses per hectare, compared with other North West authorities that are also classified as major urban conurbations of 30.5. Wirral appears to have a policy that requires a housing density of around 20-30 dwellings per hectare (dph), although this does differ by specific area or zone within Wirral. Increasing the target density could allow the development of more affordable housing on current brownfield sites or already identified areas for further development. As stated previously, this does not necessarily mean building large blocks of apartments or flats, but rather the development of more discrete, relatively low-rise units with a housing density around 35-40 dph. If the forecasted growth of 7,390 houses could be developed within exiting developed areas without using green field sites, this would lead to a density of around 35 dph by 2034. The well documented demise of the high street and forthcoming closure of major retail units across the borough provides further opportunity for redevelopment. Numerous shops and premises in Wirral's urban centres are either closed or appear to be used for temporary or short-term occupancy. It is feasible that these urban centres can be regenerated to support mixed environments close to existing services and infrastructure.</p> <p>It is unknown at this moment what effect Brexit will have on future housing needs, but any exodus of EU nationals from the UK in the next few years could have consequences for the migration of employed people across the UK chasing vacant job opportunities away from where they currently reside. It is unlikely that many of these job opportunities will be in Wirral in comparison to other areas of the country, as Wirral has 2.5% of the population who are EU Nationals, in comparison to 6.2% and 5.8% for the rest of England and the UK, respectively. If there is considerable migration of working age people and families away from Wirral to satisfy any future demand for vacant employment elsewhere, the requirement for new housing will diminish. Once green belt land is developed, it is impossible to return it to its previous state. Housing density can be controlled over time, although significant changes do require extended periods of time. If the population of Wirral does not continue to grow, or grows at a much slower pace, the development of green belt land for purposes and/or families that do not or will not exist could exacerbate the number of vacant properties already on Wirral, which stands at 4,900 or 3.2%. 4,900 represents 66% of the 7,390 properties required to be built by Wirral according to current central government objectives. In summary, the building of new housing on green belt land away from required amenities and infrastructure appears short sighted and unnecessary, given:</p> <ul style="list-style-type: none"> • the variability of the population estimates, which seems to require rework every couple of years • unknown or unpredictable nature of employment prospects for the region due to current macroeconomic uncertainty • the population increase due mostly to an increase in single elderly retired people.
DOR00881	<p>Major concern is the potential impact of the proposals on The Wirral's Green Belt and as a consequence on The Wirral as a whole. The Local Plan would affect all of us in some form, not least the loss of The Wirral's unique character which makes it so special for everyone - whether living on the peninsula or visiting to enjoy its amenities and character. The proposals would have adverse impact on practical day to day matters, for instance infrastructure, education, health facilities, transportation, leisure and the environment. The concerns which underpin our objections include:-</p> <ol style="list-style-type: none"> 1. The validity of the housing targets which have been set by central government using a standard formula which has been applied across the UK, rather than by reflecting the specific requirements of The Wirral. 2. Local population growth figures do not substantiate the housing targets being used. 3. Currently there are 16,000 planning applications that have been granted on brown field sites; with a strategic plan to support these developments, there would be no need to extend building on to existing green belt land. 4. Peel's Wirral Waters Scheme should be supported strategically in terms of infrastructure to enable their targets for housing units to become a reality. This would provide a significant number of housing units with an even greater potential in the future, with the key benefit of being part of a wider Regeneration of a multi-use nature in an area of The Wirral which could become a valuable asset to the community as whole. 5. Land values in any released Green Belt would largely result in more expensive homes being built, rather than developers building mixed developments with affordable homes. There is plenty of evidence of high land values on the Wirral, particularly in those parts of The Wirral where most of the Green Belt lies, and where high land values lead developers to build more profitable, expensive homes. 6. The scale of development anticipated in the Local Plan in relatively isolated greenfield sites, would result in a lack of facilities, e.g. regular public transport, shops, schools, health care facilities, etc., leading to fragmented infrastructure and further economic strains on the wider community. 7. No apparent account being taken of the existing potential for increasing housing availability through initiatives to release empty houses on to the market. 8. Adverse impact on The Wirral's unique characteristics through loss of biodiversity and public amenities, including access to open spaces, woodland and footpaths. 9. Employment prospects are likely to be best served by development on brown field sites and areas requiring regeneration, both during the development phase and thereafter through extension of

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	<p>the critical mass of existing neighbourhoods.</p> <p>10. That the Council appears to have a view that higher value houses will bring higher Council Tax revenue without seemingly recognising the overriding need for affordable homes, and that overall there is potentially greater revenue potential from higher density housing and associated mixed development use on attractively developed brown field sites.</p> <p>We should be grateful if these concerns and observations are given consideration in order to protect The Wirral's Green Belt and to provide a Local Plan more suited to The Wirral's own specific requirements to the advantage of the wider community .</p>
DOR00882	<p>PARCEL REF SP058B</p> <p>Support proposal to correct the anomaly of our rear gardens being included in the green belt, where our homes are not - refers to Option 58.2 detailed in the Summary of Initial Green Belt Assessment</p> <p>Wish to have rear gardens included in the urban area, therefore the green belt boundary corrected to use the Wirral Way as the clearly recognisable feature which is readily recognisable and likely to be permanent. Boundary correction will ensure a green belt boundary consistent with the existing pattern of development of Pipers Lane, Heswall on this date.</p> <p>PARCELS REF SP058C, SP058D, SP058E</p> <p>Object to the intention to develop this land in future.</p> <p>The proposed development would be a negative impact to the local environment landscape which is open and supports biodiversity and wildlife in the form of badgers, bats, and birds. All type of animals exists on the proposed development sites. These statements refer to multiple objections made to developments proposed on Pipers Lane in the past by the Wirral Wildlife and Merseyside Environmental Advisory Service, specifically referring to bat roost potential, conditions to protect badgers, and conditions relating to breeding birds The proposed development would increase light pollution. Currently there are no street lights past 77 Pipers Lane to the west, and the area is therefore naturally dark. Developing the end of the lane would increase light pollution having a negative impact to current residents and wildlife. The proposed development would increase traffic volume on Pipers Lane. Pipers Lane is not capable of handling even a small increase in traffic due to numerous single carriageway sections, with road widening not possible along the length of the lane. Furthermore, there is no pavement, and no opportunity to provide a pavement in many places. This further increases the road safety risk to pedestrians and the many recreational users, families, and dog walkers using Pipers Lane to access the Wirral way. Traffic congestion is an existing issue on Pipers Lane with the current volume of traffic navigating the numerous narrow pinch points. Pipers Lane is the only access to Bush Way, Crossley Drive, Sandfield Park, Warren Way, Pipers Close, The Pipers and Redstone Drive. The quality of the road surface and infrastructure (many potholes, sinking road surface, minimal/limited street lighting) also do not support any increase in traffic. Considering the main access to Piper's Lane to be Delavor Road (the other option being Oldfield Drive, which is an un-adopted road in a bad state of repair), there are also road safety concerns at the junction of Delavor Road to Thurstaston Road and Dee View Road, which is a dangerous junction without clear right-of-way. An increase in traffic volume would also increase noise and disturbance to residents and wildlife. Pipers Lane is not amenable to public transport to service the increased volume of residents. The proposed development would stretch capacity of infrastructure, such as road drainage systems, as currently the road floods in many places during heavy rain. The number of schools, especially high schools, of which Pipers Lane is in the catchment area of is very limited.</p> <p>There are 4 primary schools and 2 high schools within reasonable distance, and an increase in the volume of residents will either require additional schools or increase the intake numbers in future years, to the detriment of our children's education.</p> <p>SP058C indicates space for 18 dwellings (referring to option 58.3 detailed in the Summary of Initial Green Belt Assessment September 2018). This density of dwelling is out of character with the surrounding area and will have a negative visual impact as viewed from Wirral Country Park.</p> <p>SP058E indicates space for 62 dwellings (referring to option 58.4 detailed in the Summary of Initial Green Belt Assessment September 2018). This density of dwelling is out of character with the surrounding area and will have a negative visual impact as viewed from Wirral Country Park.</p>
DOR00883	<p>Dismaying that despite the repeated opportunities to establish a plan for the Borough it has taken the precipitate action of the Secretary of State to galvanise the elected and appointed officers into a course of action. The process has been rushed – an enormous number of documents require examination if one is to make any sense at all the Council's intentions. Inadequate time has been allowed. Surprising, at the very least, that the consultation process has not been revised in light of the new information that has come to light (by intrepid examiners of the wider picture), namely the reduction in the target, undisclosed numbers for unoccupied properties and the assertion by Peel Holdings that they project many thousands of homes will be built as part of Wirral Waters. This would be appear to be a flawed consultation</p> <p>First plea is that the cordon of protection for the existing coastal margin West of the Wirral Way be maintained. The Wirral Way is a precious resource for all residents of Wirral, and a part of the national cycle network. Allowing the level of development that is unsuitedly posited in Appendix 16 would turn the Wirral Way into little more than a back alley, and the impact of housing development on Green Belt land between Target Road and Cottage Lane in Lower Heswall/Gayton (including SP099-SP104) would almost certainly result in massive impacts on sites of biological importance, not to mention risk of flooding and strain on an already inadequate sewage system. Pertinent to this, the issue of sewage is a continuing concern for the residents of the lower portion of Seabank Road. However, one could add inadequate and unprovable access down Station Road and Wittering Lane, pressure on local school rolls (already with waiting lists), hazard to all users of the Wirral Way along Davenport Road, amongst others.</p>

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	<p>The designation of any development in this area as in-fill is spurious at best and contradicts the edicts about protecting the green belt and precious open spaces for biodiversity, wildlife and (imagine) growing crops to feed the people! It is clear from previous exhortations that the development of green belt should be an absolute exception, when all other options have been exhausted one would reasonably expect. Nevertheless, there is a requirement for affordable housing across the UK and we must as a country address this but it is certainly not the motivation behind some of the alterations to land classification being suggested in the documents presented by the council for the green belt area of Lower Heswall and similar green belt areas around the Wirral, notably Irby/Pensby, Irby/Greasby and Thingwall/Barnston where swathes of green belt are at risk from development that would change the character of these communities for all time. The changing information that has been uncovered however suggests that our council is set on a course, since: the initial demand of 12000 homes over 15 years has now been revised to 7500 (not disclosed); the council has not disclosed that there are in excess of 4500 unoccupied properties in the Borough; Peel Holdings refutes the council leader's claims that it has downgraded the target for properties it intends to provide as part of the Wirral Waters project; Wirral has demographics that are unchanged over many decades and the projection is that it will remain thus - how can these not be relevant to the consultation. I would be surprised and disappointed if you did not have all of this information within your grasp. If there is need for development then it should be entirely focused on Wirral Waters. This has the possibility to meet the demand for affordable housing that would never be met by executive homes built on the green belt agricultural land of Lower Heswall.</p> <p>On behalf of all the residents of Wirral you MUST make all efforts for a successful outcome of the Wirral Waters project – this is the prize – and will be the most suitable legacy for future generations to thank you for. That means looking beyond the next chamber vote or election but doing the RIGHT THING. The positive benefit of urban regeneration of Birkenhead (and Liscard, for example) are essential. Sadly, Birkenhead is dying, yet has the potential for employment supported by amenities, public transport links and infrastructure that obviously flag it as the prime focus. One only has to consider the impact of the investments made in the East of London (The Dome, Olympics, and housing stock improvements) to consider that “sunny uplands” are a real possibility – precedence being the best measure of future outcome.</p> <p>It is more than clear that this is a rushed job, at best poorly (perhaps negligently) communicated and will undoubtedly raise suspicions of nefarious, background activity to release land from the green belt for high value developments. These observations will likewise encourage the residents and voters of Wirral to a heightened level of scrutiny of the elected and appointed officers of the Borough administration for any whiff of impropriety or inappropriate benefit.</p> <p>Such suspicions are raised further by the non-disclosure of the sale of agricultural land around Riverbank Road and Seabank Road to a property developer.</p> <p>My intention in this response is to encourage the maintenance probity and honourable behaviour befitting the officers involved.</p> <p>I am sure you will be aware of the pressure coming from Central Government for all local authorities to contribute a new plan for housebuilding. For Wirral this means 12,000 new homes. The consultation period ends on Friday 26th October. Because our property bounds one parcel of land subject to possible development we have received the attached letter. If yours does not, then you will not have been alerted!</p> <p>It is imperative that we as a community respond to this. The decisions made by our council and its planning officers will have a lasting impact on the local environment, coastal margin, its wildlife and the common amenity offered by the Wirral Way, not to mention the impact and strain on local (primary) schools, infrastructure (roads, sewage for example) and potential for run-off, flooding that could result. These are just some possible impacts but they are only a primer for your own concerns. The excellent original response made on our community's behalf (after the initial public meeting in Sep. 2017) is still valuable. Please feel free to borrow a copy from me. There are more recent briefing notes too that have been made available that deal with the up-to-date issues uncovered by the “Riverbank” team. The Heswall Soc. & Irby, Thingwall & Pensby Amenity Soc. websites http://itpas.org/page2.html & http://www.theheswallsociety.org.uk/green-belt.html can guide you on ways to respond. The land that is of most concern to us in Lower Heswall is to be found on pages 166-189 of Appendix 16 (on the Wirral.gov website – see original letter for the link). Again, I can let you borrow my copy. You can see the parcels of land from the associated maps and imagine how this would affect the character of the area. Otherwise, the documents are available at the library.</p> <p>You will see that these, on the one hand, have been earmarked for designation as greenbelt (high quality agricultural land) but on the other hand parcels SP099, SP100, SP101, SP102, SP103, SP104 are also listed with a potential “option” for “in-fill” village development of up to 117 new homes. That represents an increase of around 75% over all the properties on Davenport Rd., Park West, Manners Lane, Seabank Road, Riverbank Rd and Close put together.</p> <p>The contradictions of this are obvious but need to be pushed back.</p> <p>A separate but equally disquieting matter is failure of all politicians and planning officials to address the issue of Peel Holdings and Wirral Waters. The latest volleys in this have been an assertion by Peel Holdings that they will commit to more than half of central government's “demand” if suitable partnership with local govt. is achieved. It doesn't help to make this a political argument (a plague on all their houses perhaps!) but submissions to our local MP and the Secretary of State (James Brokenshire) may be beneficial.</p> <p>Related to this is the real data regarding the demographics of Wirral; its population has changed little despite the increase nationally. Thus, the figure from Central Govt. may be used as a Trojan horse for development by landowners/developers on precious greenbelt land that does not meet any of the needs of real priority, namely affordable housing, and which should be serviced by public transport, already have infrastructure in place, utilise brown field sites and be close to the opportunities for employment.</p> <p>I do hope you can make time to register your opposition to the proposals to release the farmland around us as ripe for potential development.</p>

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DOR00884	<p>Major doubts about Wirral Borough Councils prediction of housing needs and population growth. Wirral's own document " Compendium of Statistics 2018 (Table 1i) forecasts only 1.7% overall all ages population growth between 2018 and 2038. To put this in perspective overall historic actual data in the same document (Table 1h) shows a growth of only 100 people between 1996 and 2017, this being less than 0.1%. These figures are way out of proportion to the suggested increase in housing requirement/</p> <p>Based on the above figures Wirral does not appear to require development of anywhere near the area of greenbelt shown in the Consultation documents in order to meet demand. In any case, I consider that the huge derelict areas of Birkenhead need addressing before any Greenbelt is considered for release.</p> <p>Also, considering the demographic changes forecast for the Wirral, that is general reduction in population under 60 and increase over 60 , there is an urgent need to address the housing needs of the elderly population. In general this should mean higher density housing, closer to amenities, designed to deal with mobility issues, such as apartments / sheltered housing.</p> <p>Should any greenbelt need to be released, then as a last resort , I believe these sites need to be selected very carefully to ensure they are fully sustainable and within reasonable distance of good efficient "green" transport infrastructure. Typically that should mean they would be within about 400m of rail connections. I would highlight that many of the sites proposed around west Wirral proposed in the consultation appear too far from rail stations, meaning that residents would be largely reliant on less sustainable, and more polluting travel modes, such as cars and buses, and use of a congested highway network "</p>
DOR00885	<p>Object very strongly to the proposals to release any of the green belt land under consideration in Wirral for the development of housing, for the following reasons.</p> <p>1) Peel Holdings proposals for the building of housing in the Birkenhead docklands. Originally, Peel Holdings promised to build up to 13,000 homes in the dockland areas as part of their re-development plans. They now say that they are only going to build a relatively small number of houses on these brown field sites. Why can't they be compelled to build the extra houses? Are they in any way contractually obliged to build the full number of houses as originally planned? If not, why can't the council issue a Compulsory Purchase Order to buy back this land and build the required houses themselves? There is enough brown field land on Wirral to satisfy the requirement to build the 12,000 homes.</p> <p>2) Does Wirral really need an extra 12,000 homes? Who will occupy them and what new jobs will be created to attract the necessary number of new residents?</p> <p>3) What about the necessary services to support the extra residents? Additional shops, schools, hospitals, transport infrastructure will all be needed.</p> <p>4) Much of the attraction of Wirral for both residents and tourists is the open spaces: meadows, woodlands, attractive ancient villages. Many of these attractions would be destroyed or engulfed if these developments were to go ahead.</p> <p>5) Urban sprawl. One of the purposes of green belt land is to limit the spread of urban sprawl and prevent the various conurbations from merging into larger areas. If these plans were to go ahead, the areas of Prenton, Storeton, Bromborough, Bebington, Raby Mere and Eastham would become one large conurbation. The historic woodlands and parks of Eastham and Dibbinsdale park would all be destroyed.</p> <p>6) Loss of wildlife habitat. With the destruction of large areas of woodland, open land and hedgerows, the effect upon wildlife, birds and fauna would be devastating.</p>
DOR00886	<p>Having fully read all the now available information about the proposed changes to the present Green Belt land for house building, I would comment:</p> <ol style="list-style-type: none"> 1. Following the review of housing needs in the area, it is obvious that your original figures were wrong. 2. Road access to land west of the Wirral from the lower village is already far too little considering the two local schools. 3. The wildlife conservation area west of The Wirral Way, must be preserved at all costs. 4. There are many as yet unused Brown Site areas in the area. 5. Agricultural farm land West of The Wirral Way, is important if we are to support ourselves after Brexit! 6. There is already flooding in the area & this would worsen if even more land was built on. 7. We need to preserve this wonderful open aspect across the River Dee & to the Welsh coast. 8. The Wirral Way is a very busy pedestrian, cycle & horse riding path which must be preserved & made safe.

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DOR00887	<p>Not against building more homes, but I have significant doubts that the building of more homes in this area is the right move for anyone. I would be happy to back the idea if the council can show that significant investment will be made in local infrastructure, including parks, playgrounds, local conveniences, etc. In Spital we have no public park or playground. The public right of ways through the Claremont fields are the closest way my young children and I can experience nature. There are no playgrounds within a 30 minute walk of us, and that length walk is impractical with 2 under 5 years old. We have no post office within walking distance. There is a small GPs in what is referred to as the precinct, and many families use civic medical centre in Bebington, but these are both heavily subscribed and routine appointments take at least 2 weeks to secure.</p> <p>There are very few shops available locally not requiring taking a bus or use of a car. The schools here are fully subscribed. My son started [local school] this September and there are 2 full classes of 30 children, and I am told it is the same for the other years.</p> <p>Building more houses, inviting more families to the area, I have no problem with that. But when services and public amenities aren't put in to serve them it will cause significant negative impact on everyone, existing residents as well as new ones who find themselves fighting for school places, GP appointments and unable to access basic services such as the post office without a car or taking the bus. I know there are other areas being discussed, but I feel my point regarding investment in local infrastructure is still valid for these places, even if the specifics are different.</p>
DOR00888	<p>Disappointed in how the council have approached the production of this plan, and disappointment in the disregard the council has paid to the beautiful parts of the Wirral which were represented within red lines on a map. Your Council Officer admitted (Hulme Hall 10th September Consultation Meeting) that if all the land suggested on the map on the Birkenhead side of the M53 was to be released from greenbelt then 0% of the land currently designated as greenbelt on this side of the Wirral would remain. 0%! It is unbelievable that a council can produce such a ridiculous, thoughtless and lopsided plan.</p> <p>Storeton is a small village surrounded by greenbelt. The greenbelt is used for crop growing, grazing and leisure. The village attracts runners, walkers, cyclists, horse riders and we even have a Caravan Site which brings tourists into our lovely green peninsula. It provides a haven for wild life and residents of the locality alike. On any morning of the week, but especially the weekend you see people enjoying the scenery and the countryside which our village provides. People of all ages from all walks of life enjoying themselves. We even see groups of people visiting on English Heritage Tours from time to time due to the historic and archaeological significance of this historic village. A village which is so old it is mentioned in the Domesday Book of 1086.</p> <p>When you look at the 5 purpose of the greenbelt (source www.gov.uk) the disbelief and disappointment grows. It is difficult to imagine how Storeton has been surrounded in red lines in more than 1 map on The Draft Local Plan and whose heritage you seem to happily disregard.</p> <p>I would like to explore these 5 purposes within the context of Storeton.</p> <ol style="list-style-type: none"> 1. Check the unrestricted sprawl of large built-up areas - Unrestricted sprawl would undoubtedly be encouraged if the land around Storeton village were to be released from Green Belt. Sprawl from several towns in all directions. Once merged into Bebington the village of Storeton would not be distinguishable. 2. Prevent neighbouring towns merging into one another - Storeton is neighboured by Bebington, Barnston, and Prenton. <p>Releasing the areas indicated on the published maps would encourage the merging of Storeton with all these other villages/towns thus contrary to this purpose.</p> <ol style="list-style-type: none"> 3. Assist in safeguarding the countryside from encroachment <p>The countryside in Storeton is well utilised by not only leisure activities, but also by traditional countryside businesses. We have dairy farmers, livestock farmers and crop growing farmers as well and businesses providing services for the equestrian pastime. This strip of countryside also provides clean Wirral air for enjoying down time. Releasing this land from greenbelt will threaten these past times and industries to huge detriment.</p> <ol style="list-style-type: none"> 4. Preserve the setting and special character of historic towns <p>It goes without saying that enabling the unrestricted enlargement of Storeton Village will remove the charm of the place. The views across the locality are unrivalled. In 100 years', time it is imaginable that unless the Green Belt is reserved then Storeton will have been allowed to be changed irrevocably from a hamlet to a large town which cannot be distinguished from other towns around it. It seems such a shame that this could happen just because the planners were unable to use their imagination and our council had been incapable of working effectively with developers to build the homes needed to ensure a sustainable future for the peninsula in years to come.</p> <ol style="list-style-type: none"> 5. Assist in urban regeneration, by encouraging the recycling of derelict and other urban land <p>During the consultation period it has really made me aware of the areas around The Wirral which are being underutilised and where the council have been incapable of encouraging developers to build of brownfield sites. I was horrified to discover that the council are able to use the excuse that some brownfield sites are too small, or too contaminated and therefore cannot be considered "viable" alternatives to the cheaper option (for developers) of churning up the greenbelt. You have let us down. Elected and unelected - you have failed to work on making these sites viable. You have relied on Peel Holdings completing all their planned development of the waterfront to meet our housing needs and left other parts of the Wirral to accumulate small holes of development opportunity left wasting. So now it seems that it is preferable to leave these holes undeveloped and to start making life easier for developers. Developers are of course allowed to make money, but at the expense of our greenspaces? The council should be preventing this kind of cherry picking of land and not encouraging them. By releasing green belt land unnecessarily the council will not be discouraging the regeneration of urban areas of the peninsula. Finally, I would like to draw attention to the statistics which have been used as the basis of this Local Plan. My understanding is that the government provided the methodology to be used in determining future housing needs and the subsequent targets which have been used as the basis of The Plan. WBC used this methodology</p>

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	<p>without questioning it even when the outcome was massively higher than their own statistics held in the Wirral Compendium. On the 3rd September (at the Wallasey Town Hall Consultation Meeting) [council officer] admitted that WBC had not questioned the methodology or the results even though you are entitled to do so. In fact, [council officer] admitted that WBC was not aware that they had the option to question the statistics. I understand that [council leader] has subsequently written to The Secretary of State challenging the target produced from this methodology and that a more recent and more modest projections from ONS have been provided. May I request, that The Local Plan is based on realistic projections of population growth and housing requirements in the coming years and that the council continue to question any given methodology which does not seem realistic. I would also urge WBC to fight the 20% penalty that was served upon us as result of not producing a plan in line with government timelines over the last several years. The penalty is not fair on the people of the Wirral who were not aware that our Council had been letting us down in this regard. To close, I would like to thank you for the opportunity to express my opinion on this Draft Local Plan. I urge you to reconsider the elements which expressly impact the reduction in size of the greenbelt in all areas of the peninsula, but more particularly around the historical village of Storeton. I would also ask that you work with MPs and government to explore all ways of making brownfield sites viable to be built on. I will also be requesting my MP to assist you as much as possible to this end. Austerity should not be allowed to be used as an excuse for parts of residential areas to be left as wasteland.</p>
DOR00889	<p>Objection to proposed building on green belt site ref :- sp052 being as this is in a green belt area and conservation area this is why we moved to a village location and not a concrete jungle which you are planning. This village dates back to medieval times and is mentioned in the doomsday book ,we should be looking after our villages not making them part of a town environment. This is part of our heritage and should be preserved as it has been for hundreds of years.</p>
DOR00890	<p>There are some discrepancies in relation to the extent of the SHLAA site 17179 which should be addressed in the Council's assessment sheets. As can be determined from the above analysis the site has excellent containment in the form of permanent urban and natural boundaries which will prevent any urban sprawl as there will be a clear protectable boundary. The site would not lead to the merging of two towns as the site will just be a round off of the development form of Bebington and would not protrude from the Stanley Avenue development to the northwest. The site has the potential to be released in isolation or as part of a bigger land parcel to the north of Lever Causeway. Releasing the site from the green Belt would therefore encourage the development of sustainable dwellings in a location where they will be able to be incorporated with the local area without impacting the wider countryside allowing its boundaries to be defensible beyond the plan period. There are no prohibitive environmental constraints to preclude it from being brought forward for development, which would be vital when the Council undertakes a sustainability appraisal of its emerging local plan and preferred sites. SLHAA1779 is considered to be deliverable and available and should therefore be allocated for immediate release from the Green Belt. [Vision Statement and Appraisals attached] There would be no issue in removing part of the hedge line to make way for a suitable access point on to site. The site can be considered to be in a sustainable location with excellent access to local services and amenities within Bebington and surrounding areas. The proposed site was put forward in the 2016 SHLAA Call for Sites (site reference 1779). Within this it was stated that the proposed site has the potential to accommodate 119 homes. Within the Call for Sites assessment the proposed site was marked highly for everything apart from its Green Belt allocation and was therefore not considered to be suitable for new development. If the site were to lose its Green Belt allocation as proposed in the Land Allocations consultation then it would be suitable for new residential development and furthermore, it would be achievable within 5 years thereby contributing significantly to Wirral's housing supply. An updated appraisal with the inclusion of detail that has been gathered from the baseline studies conducted on site. SHLAA 2016 scored this highly as the proposed site is located in a residential area and there would be no noise or air quality issues which would affect any new residents on the proposed site. Again, the SHLAA 2016 scored this highly as the site is not identified as being of a high agricultural land classification, nor are there any major flooding issues on site. It would be appropriate to maintain the initial score provided. The site is not allocated as being employment land under the existing UDP and its location would not lend itself as being appropriate to be allocated in the future as employment land due to the residential nature of the area. The site has no green or open space allocation and it is not currently used for any recreational purposes. It would not be appropriate for any future designations of this nature. There are small patches of surface water flooding however, due to the large size of the site there will be plenty of opportunity and space to provide efficient flood mitigation and appropriate drainage techniques which will eradicate any further surface water flooding. Furthermore, an ecological appraisal has been conducted onsite which has concluded that the development of the site is feasible and acceptable in accordance with ecological considerations and the NPPF. The site does not hold any high ecological value and any future development would be able to implement reasonable action for the protection and long-term conservation of fauna. There will also be a good opportunity to enhance ecology for the local fauna.</p> <p>As discussed in the Green Belt assessment the proposed site does not contribute significantly to the purposes of the Green Belt. The proposed site has an identifiable and permanent defensible boundary which other sites across the Wirral identified for release do not have. This would prevent any sprawl in the future making the site safe to release with no future extension opportunities. Due to the matters discussed we believe the Green Belt Score should be higher than the zero published in the SHLAA 2016 as the site doesn't significantly contribute to the purposes of the Green Belt. Within the heritage statement it identified no major heritage constraints which would preclude the allocation of the site and that the requirements would accord with section 3 of the NPPF. Therefore, neither issues relating to built heritage (such as nearby conservation areas) or below ground archaeological are considered to be a major constraint and this wouldn't prevent the future development of the site. An initial review of the site location indicates that the potential development would be seen as accessible by sustainable modes of travel and likely succeed in achieving the minimum score required within the Accessibility Assessment, subject to a number of provisions within and outside of the site. The site can therefore be considered to be accessible and sustainable for new residents. Countryside Properties has quick build out rates ensuring that the site will be developable and deliverable within 5 years should it be removed from the Green Belt. The site would</p>

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	<p>be in a sustainable location in a primarily residential area which would be highly sort after. Within the appraisal it concluded that visually the site is relatively well contained within the local landscape and from recreational routes. Any new development would sit within the containment of the site and there would therefore be no detrimental impact on the landscape of the local area. The supplied suite of documents and this vision statement show that the site is more appropriate for development than initially identified within the SHLAA. Besides the Green Belt allocation, the proposed site would be appropriate for development and would be deliverable within 5 years. The site contains no policy constraints besides the Green Belt allocation preventing its future development. The site is fully enclosed and contained by the adopted road network which will help prevent encroachment in to the countryside whilst providing a clear physical feature which is likely to be 'permeant', (in line with para 85 of the NPPF). This is contained in all directions and therefore should be assessed as having a good defensible boundary. The site doesn't contribute significantly to any of the 5 purposes of the Green Belt as outlined in the NPPF and Local Plan. Based upon the supporting information we believe that the proposed site at Marsh Lane does not significantly support the 5 purposes of the Green Belt and its release from the Green Belt would be considered to be sustainable and in line with the NPPF to bolster housing requirements across the Borough. On current evidence, neither issues relating to built heritage or below ground archaeology are considered to be a major constraint. The potential route of a Roman road is recorded in the eastern part of the site, however the true line of the road is unknown. This may indicate some limited potential for Roman archaeology to be present within the site, however given the putative nature of the location of the road, this is not considered to represent a barrier to the allocation of the site. This appraisal has assessed the potential impact of development within the proposed allocation site upon the significance of the Mount Wood conservation Area. The site is not considered to result in any harm to the significance of the Conservation, through changes to its setting. The appraisal has identified that there are no major heritage constraints which would preclude the allocation of this site and its inclusion in the local plan would meet the requirements of Section 3 of the NPPF.</p> <p>[Vision Statement, Site review, heritage appraisal, accessibility report, HER data, Ecology assessment, landscape and visual site appraisal attached]</p>
DOR00891	<p>Concerned generally, in regard to the scale of potential loss of Green Belt sites suggested by the Development Options review. Whilst we appreciate the need for the Council to identify suitable housing land, we would wish to ensure that the implications of such major changes to the Green Belt are fully understood by the Council, in order that a suitable planning balance can be reached. Is particularly concerned in regard to the following sites, which have direct implications for our properties:</p> <p>SP060 - South of Thingwall Road, Irby - This site includes land in National Trust at Harrock Wood. This land has been declared inalienable. This is a power conferred on the Trust by an Act of Parliament, which allows us to protect a site in perpetuity for the benefit of the nation. In practical terms therefore, this means that it cannot be developed, and we would strongly resist any development on adjacent land which would affect the special qualities which led it being declared inalienable. These qualities include landscape character, visual amenity, ecology and accessibility. Harrock Wood comprises remnant Wych Elm woodland with other hardwoods including oak, beech and ash standing alongside the Arrowe Brook. The Wood adjoins a small water meadow and with the adjacent farmland, helps to break up the urban environment and give an open feeling to the area. A public right of way runs through the Wood, linking through the adjacent fields, to the urban area beyond.</p> <p>Site SP060 lies within the 'Pensby and Irby Urban Fringe' Landscape Character Area, as defined by the Wirral Landscape Character Assessment 2009 (WLCA). Harrock Wood is recognised as one of the identified Key Characteristics of this landscape type. The WLCA notes that land cover is mostly farmland, with an ancient and post medieval field pattern. The open and expansive character, and value of the area as a local recreational resource is recognised. The suggested landscape strategy for the character area is 'Enhance'. Identified threats to the landscape include urban encroachment, loss of hedgerow and field patterns and increasing urban elements. Specific guidelines include, inter alia, the enhancement of field patterns, conservation of the wooded character of Harrock Wood, and conservation of the meandering wooded route of Arrowe Brook, including enhancement of its riparian vegetation along its route outside Harrock Wood. With regard to capacity to accommodate change, the WLCA notes that this character type is an important buffer between the urban edges. Welcomes the acknowledgement made by the Council, to 'Protect river corridors, Harrock Wood and public rights of way'. However, we are concerned that any development of this area would raise fundamental conflict with the landscape guidance outlined above. The setting of the Wood would be significantly compromised by development of the adjacent fields. We are also concerned in regard to the potential impact upon ecological networks, the significant increase in recreational pressure on the woodland, and the potential loss of archaeological remains.</p> <p>SP019B - East of Glenwood Drive, Irby - This site lies in close proximity to Harrock Wood. It contributes to its wider setting in terms of landscape character, and ecological and recreational connectivity. The site includes the Arrowe brook corridor and woodland along Limbo lane. This corridor is already developed along its western edge, and experiences adverse effects as a consequence. There are a number of ponds with surrounding copses across the site, which are valuable in both character in habitat terms. Limbo lane pond is locally designated as a Site of Biological Importance due to the presence of Smooth Newt. The site lies within the 'Thurstaston and Arrowe Park Wooded Hills' character area, as defined by the WLCA. This character area also includes Trust land at Thurstaston Common, to the west. Identified Key Characteristics include the series of wooded hills, the appearance of being almost totally wooded from high ground, and undulating farmland following long and linear patterns bordered by mature hedgerows and small belts of woodland.</p> <p>The ecological connectivity within the area is reflected in the reference to the series of small wooded brooks and streams which flow through the area, and field ponds. The quality of the area is considered to be 'Good', and a recommendation is given to 'Conserve', with emphasis given to managing key features such as wooded hills and the long linear field pattern. 'Selective viewpoints by Limbo plantation' are highlighted as key. Guidance is given for new development to conserve the existing field pattern. Again, we welcome the Council's reference to 'Protect Limbo Lane, woodlands and ponds and public and permissive rights of way'. However, given the potential scale of change, we are concerned that these measures would be inadequate. Development of this area</p>

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	<p>would undermine key features of the landscape, notably the long, linear field pattern. The visual impact upon receptors using Limbo lane, highlighted as a key viewpoint, would be significant. Unless protected by significant buffer zones, the habitats along the Arrowe brook corridor, and the field ponds, would be significantly compromised.</p> <p>SP059E - Rear of Irby Hall - As with the development of all of the proposed sites highlighted in this response, we are concerned in regard to the additional recreational pressure the development of this site would give rise to at properties in the Wirral. This site forms part of the wider setting of both Thurstaston Common and Harrock Wood. The current undeveloped nature of this site allows for views westwards from the urban area across the open countryside, and contributes significantly to a strong rural character in this part of Irby. Development would therefore result in a notable impact upon local character.</p> <p>SP013 - West of Column Road - This site also lies within the Thurstaston and Arrowe Park Wooded Hills character area, forming a key element of the range of wooded hills that form the backdrop to the area. It lies in close proximity to land at Caldý Hill, and is clearly visible in views westwards from Thurstaston Common, forming an important element in the setting of both.</p> <p>The established tradition of quiet enjoyment of the countryside has endured on parts of Thurstaston Common for over 100 years. Thurstaston Common was acquired by the in 1916 in memory of those who had Fallen in The Great War. We commemorated the 1916 donation thus ...“This stone was laid in 2016, the centenary of the donation of part of Thurstaston Common to the National Trust. Given in memory of Capt. Morton Brown Paton and others from the Hundreds of Wirral, who gave their lives during the Great War”. It is still possible to get the feeling of a wild and remote place on parts of the common, and imagine how Wirral once was in a time before major development when most of the uncultivated land was heath. The property provides a very important “Green Lung” for the communities of Merseyside, and contributes to a strong sense of place, due in no small part to the clear linkages to the heritage of the area. This is also true of Caldý Hill, with its wide views over West Kirby and the mouth of the Dee estuary to the Clwydian Hills. The LCA draws attention to the panoramic views which are possible from Thurstaston and Caldý, and the influence the higher ground in this character area exerts across the area, in forming a backdrop to views. Stapledon Wood is a designated Site of Biological Importance, indicating its high habitat value. A number of public rights of way traverse the site, linking to the surrounding urban area, (and Caldý Hill), highlighting its value as a local recreational resource. Clearly, this site is highly sensitive in both landscape character and habitat terms. Any development in this area would be highly visually prominent, strongly detracting from local character. It is difficult to see how ecological habitats and networks could be conserved. Development would also increase recreational pressure on both Caldý Hill and Thurstaston Common.</p> <p>SP058C - North of Ferns Close, Piper’s Lane, Heswall - This site lies within the Dee Coastal Farmland character area as defined by the WLCA. Identified Key Characteristics include the small and regular field pattern, and the coast, which is almost always visible in views. The character area includes the Wirral Country Park, and the adjacent landholding, Heswall Fields. It is valuable in terms of both ecological habitat, and as a recreational resource. The Wirral Way runs alongside Heswall Fields and the Country Park. The Trust regards the feeling of remoteness and tranquillity as a key quality of this area. With regard to capacity to accommodate change, the WLCA notes that some infill development could be accommodated where woodland would screen views of the urban edge, but that any development which rose above the tree line, or was visible on the skyline would not be consistent with the landscape character, as built form is rarely visible on the skyline. The LCA highlights further expansion of settlements into rural areas as a potential threat to the landscape.</p> <p>Development of this site would represent further encroachment into the open countryside. It is also possible, given the rising landform, that it would be visible from the sensitive areas highlighted above, to the west.</p> <p>Conclusion</p> <p>For the reasons highlighted above, we are strongly opposed to the removal of these sites from the Green Belt.</p> <p>[Map attached]</p>
DOR00892	<p>link from the 200+ children of [local] Junior School who want their voice heard and the right to say "no" to the use of greenbelt land.</p> <p>[you tube link to video]</p>
DOR00893	<p>Object to the release of Green Belt land for the purpose of housing development within the Wirral area.</p> <p>I understand that the Council must produce a Local Plan and that the government will impose one upon Wirral if they do not.</p> <p>Looking at the Government Standard Method which Wirral must use to allocate new housing - and using the latest ONS (2016) figures - requires Wirral to bring forth 7320 houses over 15 years (488 per year). This is significantly fewer than the 12000 over 15 years (803 per year) the Council are currently basing their requirement for Green Belt land release upon. Using the latest available ONS figures, there is therefore no justification for the release of Green Belt land since the necessary provision of housing can be made from using existing brownfield/derelict land, bringing the 4600 currently empty properties on Wirral back into use and the extensive new housing developments at Wirral Waters. Even though the 13000 proposed dwellings at Wirral Waters lie 7 years outside the 15 year Government window – it is quite ridiculous not to take this fully into account and could possibly even make Wirral Waters non-viable. In my opinion, the release of Green Belt land should always be an absolute last resort when all other options have been exhausted because once it is gone it is gone for good and by covering any green, we are stopping it from being productive for food purposes. We are already less than 50% self-sufficient in the UK which is, to my mind, a geo-political nightmare waiting to happen.</p>

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DOR00894	<p>Greenbelt as a whole and proposals for development of situated in the vicinity of Park West Riverbank Road, Seabank Road, Manners Lane North and South and Wittering Lane. The identified land has a rich history of being prime quality agricultural land. It is not just the significance of the land being agricultural that has us worried it is its significance in the biodiversity of the Dee Estuary. "The Dee Estuary is among the top 10 in Europe for overwintering wildfowl, such as wigeon, teal and various species of goose." (https://www.countryfile.com/go-outdoors/walks/hilbre-island-wirral/). The area is of enormous importance for maintaining the ecological environment for retaining the rich biodiversity. In addition the increased pollution, noise, air and loss of land references for ornithological species will take away our rich heritage as being the United Kingdom's premier birding location for wetland and shorebirds. The dee estuary in these areas has become a national outdoor attraction and area for nature enthusiast that we must protect. The Dee Estuary Birding is an active community with global links that uses this area for researching, monitoring, watching and photographing the rich and diverse ecosystem. (http://www.deeestuary.co.uk/index.html) The area is of high national and global importance signified by the Estuary being protected or listed under several schemes; Site of Special Scientific Interest (SSSI), Special Protection Area (SPA), Sensitive Marine Area (SMA), Natura 2000 site, Ramsar Site with large parts of the area being within the RSBP's Dee Estuary Nature Reserve. It is clear that the reasons why this land is designated Green Belt and is absurd to think development on this land is being considered</p>
DOR00895	<p>Strongly disagree that there is any need for Wirral Council to consider the redesign action of any belt land for development purposes, specifically Strategic Parcel 062. As the analysis paper attached clearly concludes, there is absolutely no case for building on green belt Strategic Parcel 062.</p> <p>[SAME AS DOR01052]</p>
DOR00896	<p>Grounds for our objection are:- There is no need to use green belt land as there is sufficient other land to build the number of houses required. There is plenty of available brown belt land where houses have been demolished that could be utilised to build these new houses. Good agricultural and grazing land would be lost at Lever Causeway spoiling views, increasing traffic and loss of rights of way for public access for local residents.</p>
DOR00897	<p>Views and objections in relation to parcels of land that are being proposed for future development or re-designation within the Wirral Local Plan and in particular the ones that affect our immediate area, namely green belt and agricultural land west of the Wirral Way in Heswall. Issue with the number of houses required</p> <p>I understand that the Councillor has declared that the Wirral will be required to build approximately 12,000 new homes by 2035 to meet Government targets. However, it has been highlighted that these figures are erroneous and misleading as the figure is based on incorrect calculations. The housing shortfall rather than being declared as 7,390 is closer to 4,990. Furthermore, taking into account the Wirral Waters projection of 6,450 homes plus some 4,500-5,000 vacant Council properties there is absolutely no requirement to build on Green Belt land or re-designate it for future purposes.</p> <p>Validity of the consultation process -It has been suggested that the Government have revised the number of dwellings that need to be built each year which would significantly reduce the overall number required over the next 15 years. However, it is understood that [council officer] has declared that there would be no revision to the Council's current arrangements. In addition the Council has failed to publish the 'Strategic Housing Land Availability Assessment (SHLAA)', the 'Broad Spatial Option Revised Assessment Report' and the 'Development Viability Baseline Report'. It is difficult to see how the consultation can be considered valid under these circumstances.</p> <p>The Council's 'Green Belt Review Methodology'</p> <p>In this the Council effectively states that it complies with NPPF2 which itself states, in Para 136, that "Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified...". It also instructs that the "strategic policy-making authority should be able demonstrate that it has examined fully other reasonable options..." and further states that "inappropriate development is, by definition, harmful to the Green Belt and should not be approved...". The council has had a good record, I believe, of protecting Wirral's Green Belt and it would be a travesty if it were to ignore its responsibility to the residents of Wirral by using Green Belt, especially prime agricultural land, to be used as infill development and thereby destroying the Wirral's special environment.</p> <p>In your initial green belt review Para 6.4 you state that "Land to the west of the Wirral Way has not been included, because the role of the Wirral Way in defining a clear physical edge to the existing urban area and the constraints associated with the national and international designation of the Dee coastline". Sliding in an appendix in which a re-designation of areas west of the Wirral Way is not open or transparent and the timing of some of the additions is suspect.</p> <p>Infill Villages and the environment</p> <p>The Council's position on infill villages is unclear but the fact that the criteria for assessment has not been released in time to be properly considered before the cut-off date for responses to the latest consultation is extremely worrying. The Council is trying to justify its position by claiming that parcels of land are pre-developed which is stretching the definition. The detail regarding numbers of dwellings, etc that could potentially be built on such parcels of land and the fact that certain parcels have been sold off by owners to developers would suggest that the Council has already been in discussions with developers and that these parcels of land are being primed for development even though it contradicts the Council's own green belt policies.</p> <p>Costal Zone & Agriculture - The principles for the Coastal Policy state "preserving and enhancing the character of the coast, in particular, its national and international importance for nature conservation". The parcel areas west of the Wirral Way are all located within the Coastal Zone. The policy also states that "protection of landscape quality particularly on undeveloped coastline is of considerable importance".</p>

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	<p>Considering proposals for development on agricultural land the local planning authority will seek to prevent i) the loss of Wirral's best and most versatile agricultural land and ii) the severance or fragmentation of a farm holding.</p> <p>Why is the Council abandoning such fundamental principles? Furthermore the Government is now placing greater emphasis on preserving agricultural land. Wirral should look to the future and help create a local farming community that avoids environmentally damaging transportation and boosts local produce.</p> <p>Infrastructure - It is not difficult to assess the damage to the local infrastructure if development was allowed west of the Wirral Way.</p> <p>There are only 2 ways out of Lower Heswall, up Station Road and Wittering lane. Station road is sloping, relatively narrow and comes to a blind corner when it meets Village road. Increased traffic would significantly increase pollution and could also become a major accident area. Station road also comes down to Davenport and Riverbank which are used as extensions to the Wirral Way and used by Horses, walkers, cyclists, etc. There would be an inevitable conflict between vehicles and the safety of the public and again the increase of pollution on the health and welfare of recreational users. I believe the Council has a 'Duty of Care' in such conflicts as well as a responsibility on improving air quality and reducing the borough's carbon emission footprint.</p> <p>Regeneration of Urban areas - I understand that one of the main purposes of the Local Plan is to regenerate urban land by the recycling of derelict and other urban areas. However, there appears to be reluctance by Council to put pressure on developers and builders to pursue this policy. The Council does appear to be under pressure from such developers to pick the more profitable path of re-designation of green belt land. I would expect the Council to prioritise its duty to residents rather than the profits of developers who do not reside in the borough and bring no financial benefit to it.</p> <p>Biodiversity and Environmental Impact - Green belt land west of the Wirral Way acts as a buffer for the coastal zone protection areas and offers environmental and wildlife preservation for protected species. It acts as an overspill during certain parts of the year for migrating birds that come because of the Wirral's wetlands. It's also recognised as an SSSI and the areas around us have official legal, international, European and national status. This land is also recognised as prime agricultural land which, as stated before, is covered by one of the Council's fundamental principles. If we lose this land to development we lose a recognised and important conservation area. Conclusion</p> <p>Wirral Borough Council has a duty first and foremost to its residents, their living conditions, recreational spaces and air quality. People move to the Wirral for a number of reasons which include its open countryside, coastline, varied options for recreation as well as its location close to Liverpool, Manchester and Chester for work.</p> <p>Wirral has a unique position in the Country and being a peninsular it has a climate that encourages biodiversity and has recognised national and international significance especially its coastline. If the council does not protect such areas it would jeopardise its own future and the future of rare species that could, due to climate change, potentially migrate here. The Wirral coastline could eventually become part of a world heritage site but not if proposals to allow green belt land west of the Wirral Way to be developed proceed.</p> <p>The Council has a duty to put the health and wellbeing of its residents before the profits of developers who are outside of the borough and who have no interest in the future of Wirral other than as a potential cash cow. There is a direct correlation between mental health issues and the lack of open space. If development of these green spaces is allowed then there will be a significant increase in mental health issues as both pollution and living conditions take their toll. This in turn would put pressure on an already stretched health service and lead to anti-social behaviour which, in turn, would affect policing, social and educational services. The future financial penalty to the borough would far outweigh any short term gain.</p> <p>Once green belt has gone for development it has gone forever. Future generations will pay the price for current short sighted policies and the price could be high indeed. We say that the Council should aggressively protect its green belt and protect the future of Wirral residents. We want the Wirral to be high on the list of places to live and see the redevelopment of brown field sites such as the dockland area as the way forward for regeneration of the Wirral.</p>
DOR00898	<p>Neighbours provided more details concerning the completeness of documentation and transparency in consultation. I find that missing, not issued or not available are the following documents associated with the Review :-</p> <ul style="list-style-type: none"> a. Strategic Housing Land Availability Assessment Update b. Broad Based Spatial Option Assessment Report c. Development Viability Baseline Report <p>These documents are fundamental in understanding the rationale behind the Local Plan.</p> <p>Further enquiries regarding current documentation reveal that 10 volumes comprising over 1000 pages exist regarding the subject. Given the time period allocated by the Council for consultation, missing documents and the sheer volume of documentation involved, I do not believe Wirral residents are a) in full possession of the facts, and b) will have had sufficient time to digest and provide a meaningful response within the time constraints. There appears to be some confusion with regard to the actual number of houses Wirral is required to build between now and 2035 and the subsequent roll out.</p> <p>In August 2018, the Councillor stated :-</p> <p>Government ministers have set a housing needs target for Wirral of 800 new homes each year for the lifetime of the plan. This means we must identify enough land availability for at least 12000 homes to be built in Wirral by 2035.</p> <p>Cabinet Member - Housing and Planning and Deputy Leader of the Council said :-</p>

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	<p>The Government have set Wirral a target, which means we must make enough land available to allow for 12000 homes to be built in Wirral by 2035. We know, and so do Government ministers, that we do not have enough brownfield or urban land to enable housebuilding of this scale. It is not possible to check the veracity of the housing requirement numbers, however there is a strong belief that the amount may be erroneous. All of the figures relating to the latest requirements must be clearly stated and broken down, reasoned, audited and published for transparency and clarity. This is not the case as at present. It has been stated that the Wirral Waters (Peel Group) have significantly reduced the house numbers to be built, in effect reneging on a promise given in 2010 to build 13,000 homes which has now been revised. Cllr says in his letter :-</p> <p>We have also had disappointing news from Peel Group, the owners of Wirral's largest brownfield development site - Wirral Waters. In 2010 they promised the then Leader of the Council they would build more than 13,000 homes, a number the Council was relying upon to meet future housing needs. They are now promising to build only around 2400 in the next 15 years. In the Local Plan FAQ's under the heading Wirral Waters, it is stated :- The Council's calculations currently provide for 1,100 units at Wirral Waters during the plan period. (Peel Group) communicated to the Councillor via letter on the 10th September, 2018 the following information regarding homes That Wirral Waters (Peel Group) would provide :-</p> <p>a) A minimum of 2900 dwellings.</p> <p>b) A build of 6450 dwellings in the next 15 years given Council support and cooperation which then leads on to their target of 13,000 homes. Also :-</p> <p>c) There are planning applications from Peel Group currently with the Wirral Council which with Council commitment could deliver about 1,000 new homes by 2022. And :-</p> <p>d) They do not recognise the Wirral Council figure of "2400" houses.</p> <p>e) That the Council reference to the project was misleading and inaccurate.</p> <p>There appears to be a significant confusion of figures. The disparity between Wirral Council and Peel Group is of such a magnitude as to warrant urgent independent investigation, given the fact that Wirral Council appear to have misrepresented housing figures and placed its own Green Belt under significant threat without recourse to establishing and auditing its own data used in producing the Wirral Local Plan - Development Options Review. Until this disparity is resolved, then the consultation process should be halted.</p> <p>2.4 Given the above, the council action must be to work with Peel Group in order to allow them to deliver on their original promise. I do not comprehend any reason for not doing this.</p> <p>3.1 I have not been able to ascertain an exact up to date amount for the number of unoccupied homes (Sep 2018), although a figure of 6,000 is mentioned in the Council notes dated 10th Sep 2018, Motions, 1. Green Belt Policy. I would urge the Council to continue its process of re-utilisation of these properties with vigour.</p> <p>3.2 I have not been able to ascertain how many homes might be built in total on brownfield and urban land.</p> <p>4.1 Items 2 & 3 demonstrate that there is not the need for Wirral to consider re-designating Green Belt land. There is clearly sufficient brownfield land available. The will to work together with brownfield developers however seems to be possibly missing. This needs to be urgently addressed.</p> <p>4.2 The Government's National Planning Policy Framework (NPPF2), Para 136, states :- Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified.....Para 137 of the same document states :- Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting identified need for development. Para 143 of the same document states :- Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.</p> <p>4.3 It has been shown above that sufficient undeveloped or under developed brownfield land exists in Wirral to meet its housing requirements. I do not consider that exceptional circumstances exist.</p> <p>5.1 Your letter (not received but copied from a neighbour), refers to :- A series of potential Infill Villages in the Green Belt are being considered near your property in the area along the Dee coast.</p> <p>5.2 Attention is drawn to the following Council's Initial Green Belt Review – Background Report September 2018 :- Item 2.11 of the report states : The National Planning Policy Framework states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open (NPPF Para 133) and indicates that the Green Belt serves five purposes:-</p> <p>To check the unrestricted sprawl of large built-up areas</p> <p>To prevent neighbouring towns merging into one another</p> <p>To assist in safeguarding the countryside from encroachment</p> <p>To preserve the setting and character of historic towns; and</p> <p>To assist in urban regeneration, by encouraging the recycling of derelict and other urban land (NPPF paragraph 134)</p> <p>(Note : Although the above statements still reads the same, NPPF is superseded by NPPF2)</p> <p>Item 6.4 of the report states : Land to the west of the Wirral Way has not been included because of the role of the Wirral Way in defining a clear physical edge to the existing urban area and the constraints associated with the national and international designation of the Dee coastline. Additionally, the Cllr writes :</p> <p>A Local Plan shapes the policies which guide and determine how a borough like Wirral can be developed and, if done properly, can protect the character of historic towns, help prevent urban sprawl and safeguard the countryside.</p>

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	<p>Both the above items in the Council Report and the written comment by the Cllr contradict the statement in your letter “A series of potential Infill Villages in the Green Belt are being considered near your property in the area along the Dee coast.” The contradiction regarding Infill villages continues thus :-</p> <p>5.3 Within the Summary of Initial Green Belt Assessment (September 2018), strategic land parcels SP096 and SP098 to SP106 refer specifically to land west of the Wirral Way. In each of these items shown under Commentary and Summary of Potential is the statement :-</p> <p>Not suitable for release from the Green Belt. However, within the same document, each of these items is identified as a :- new infill village in the Green Belt</p> <p>The number of dwellings have been identified most of these cases.</p> <p>5.4 Although NPPF2, para145, e) refers to limited infilling villages as exceptions, allowance of the development of this land in the Lower Heswall area does not in any way meet this criteria and would lead to urban sprawl.</p> <p>5.5 There appears to be a tendency to justify the status of infill villages by stating that parcels of land are pre-developed. As an example : The land between Riverbank Road and Seabank Road is described as being developed on 3 sides. The side that runs from Davenport Road to Riverbank Road (part of the Wirral Way) has one small bungalow, whilst the side that is Riverbank Road itself comprises 4 semidetached houses. Seabank Road is developed along its length. The statement developed on 3 sides is I believe misleading.</p> <p>5.6 The parcel areas west of the Wirral Way are identified as being within the Coastal Zone (Wirral UDP - 20). Map 8 identifies the boundaries, and Policy C02 (20.20 and 20.21) is applicable with respect prohibiting large scale development. The Principles for the Coastal Policy states : preserving and enhancing the character of the coast, in particular, its national and international importance for nature conservation Development will be permitted within the Developed Coastal Zone subject to the following criteria : the development requires a coastal location, unless the applicant can demonstrate that there is no alternative sites outside the Coastal Zone capable of accommodating the proposed development.</p> <p>The Policy also states : Protection of landscape quality particularly on the undeveloped coastline is thus of considerable importance When considering the area adjacent to my property Seabank Road and relating this to the Heswall Drainage Catchment Area (Wirral UDP - Water - 19, Item 19.19). Issues still arise regarding sewage drainage and smell particularly at the bottom of Seabank Road. This situation is not resolved. Additional sewage loading from major house developments, based on present performance cannot be tolerated. The layout and specification of roads adjacent to the above proposed sites will not support the additional traffic volume that would ensue. The safety hazards arising are likely to be severe. I have been unable to find a needs, impact statement, risk assessment or long term plan linked to these proposed changes. These items are required in order to provide a complete picture for reasoned assessment and consultation. It is very unlikely that the current occupancy levels of both St Peters Primary and Gayton Road Primary Schools will tolerate any further significant increase generated by increased housing in the Lower Heswall Area. I have been unable to find a needs, impact statement, education risk assessment or long term plan linked to these proposed changes. These items are required in order to provide a complete picture for reasoned assessment and consultation.</p> <p>In summary : There are both missing and misleading documents vital to the consultation process. These errors should be resolved quickly and communicated for transparency and openness. Housing numbers and requirements need to be clarified and communicated in a clear fashion. All of the figures relating to the requirements should be clearly stated and broken down where necessary, reasoned, audited and published for transparency and clarity. The disparity between Wirral Waters housing projection numbers and those used by Wirral Council in its consultation process must be resolved and communicated openly in order to allow residents to make considered decisions. The consultation process should be paused until clarification and verification issues are resolved There is clearly sufficient brownfield land available. The provision of a proactive attitude and cooperation with Peel Group (Wirral Waters) would firmly cement this item. This should be the primary focus of the Wirral Council with regard to housing requirements. The Wirral Council should continue its proactive approach towards empty properties. The use of infill villages appears to be a method of circumventing difficulties which might involve further public consultation. The contradictory statements regarding Not suitable for release from the Green Belt versus new infill village outlined above which are within the Summary of Initial Green Belt Assessment (September 2018) are confusing and misleading to the public.</p> <p>The instigation of infill villages in the Heswall area would negate the clear separation of settlement areas. As such the land would become part of the Heswall urban area and have a devastating impact on the character, appearance, spatial and visual views of the area in addition to the impact on wildlife, the environment, International and National constraints. There is no clear reason for development within the Coastal Zone. The implementation of infill villages west of the Wirral Way is unreasoned, against Policy and cannot be substantiated. Local infrastructure cannot cope with further development in this area. I would ask you to please consider all of the points raised and reach the same conclusion as I have with regard to the fact that the Wirral Green Belt land should remain intact, and that brownfield land should be the first option, even though developers do not see an easy profit in such land.</p>

DOR REF	RESPONSE
DOR00899	<p>Object to the release of SP042, SP043, SP044, SP045 land for housing development and any lands in the River Dibbin catchment currently on Greenbelt on behalf of the Friends of Dibbinsdale (Registered Charity) We take as our basis of objection several of the NPPF guidelines of harm types to be avoided as described below:</p> <p>Detrimental impact on the Dibbinsdale SSSI.</p> <p>Wirral has a particular problem in that it is a peninsula, surrounded by water on three sides, with most of its coast highly-protected by well-deserved environmental designations. The only ways out are into central Liverpool via tunnels, and at the south end into Ellesmere Port and Neston, Cheshire. It is therefore vitally important to wildlife, particularly terrestrial wildlife, that there are corridors for movement into and within Wirral, to enable movement in response to changing environmental conditions, and genetic exchange to avoid decline in isolated populations [170,171 refer to the need for coherent ecological networks]. These corridors are not currently marked in the Development Options Review, but have been identified in the Liverpool City Region Ecological study (see map of Core Biodiversity Areas). Corridors include the M53, railways, western coastal strip and the central Wirral Green Belt area, which stretches from the Cheshire West and Chester boundary up to the north Wirral coastal plain. It is vital that these corridors are protected from development that would obstruct wildlife movement. Detrimental impact on Protected Sites: core biodiversity areas & tree preservation areas. We object to loss of this parcel to housing development on the grounds of environmental sustainability and wildlife value. This is ancient woodland, given specific protection under the NPPF (175) because of its irreplaceable nature, species-richness and sensitivity to disturbance. We totally oppose any housing on the SSSI. We also oppose housing next to it, as development next to an ancient wood usually leads to its deterioration, because of disturbance and trampling, to which the ground flora is particularly sensitive. Destruction of an area of outstanding natural beauty. NPPF 180 refers the need to "identify and protect tranquil areas" from noise pollution and to "limit light pollution". Wirral already has very few areas that are not impacted by traffic noise and light pollution, with effects on wildlife, particularly invertebrates, owls, bats and other nocturnal wildlife. The central green corridor offers some of the best tranquil areas, and must be retained as such.</p> <p>Destruction of Heritage Assets: Lady Bridge is a medieval crossing point of the Dibbin (charter of 1276 in Rylands Library) within Dibbinsdale SSSI along with its Ancient Woodland. Dibbinsdale's history is very much a forgotten one, but none the less valuable. Our ancient woodland and the farmland that surrounds it on the greenbelt are part of the living landscape history of our area. It is what we were before industrialisation. The reason that Dibbinsdale Local Nature Reserve came into existence in the 1970's was that the people saw that it was important not to use it as a council refuse site or tip. The valley was going to be filled in by human waste. Is the future to be it is buried with houses instead? Flood Risk: site drains into Dibbinsdale SSSI to the south, a biologically sensitive flood risk area. Risk also of grey water / sewage contamination. On issues to do with flooding and water quality, Dibbinsdale is already adversely affected by excessive run off from a semi-urban environment. The management of the reserve has over a long period struggled to combat this. The River Dibbin receives the polluted run off of the M53 and much of the surrounding housing (the main sewer runs through the reserve) To increase the amount of housing in the area would have serious impacts on the ability of the systems drainage to cope. Effective Sustainable Urban Drainage Systems will therefore be required in all developments, with provision for their maintenance for the life of the development. This is not achievable. Social impact on people's health and services. More people means more traffic and possible congestion. Dibbinsdale's 'green lung' is under serious threat of contamination and over use. Wirral's green tourism will be under extreme pressure and liable to failure</p> <p>There is already a great health divide between the east and west sides of Wirral, and the east side contains some of the poorest wards on child poverty indicators in England. Easy access to open land from the eastern developed area (i.e. Dibbinsdale) is therefore important. For these reasons development should be spread between the two sides of Wirral, not concentrated on the east side. In conclusion, we feel that it is obvious that the more housing can be brought forward under the Wirral Waters scheme, the less need there will be to build on greenfield, especially Green Belt, sites. NPPF 137 states that the plan must make "as much use as possible of suitable brownfield sites an under-utilised land". NPPF 59 states that "it is important...that land with permission is developed without unnecessary delay". In the light of the case for re-evaluation of the number of houses that Wirral may need in the future (the estimated need being too high- re-evaluated by the Office of National Statistics) then we feel that brownfield sites would be perfectly satisfactory to fulfil that need for housing development. We feel that low density housing on greenbelt land is not the way forward.</p> <p>One matter that concerns us on reading the NPPF is the lack of reference to food supply. The NPPF refers to the need to retain the "best and most versatile agricultural land"[170], defined in the Glossary as grades 1, 2 and 3a. The Friends of Dibbinsdale supports this, and therefore objects to the loss of any farmland of this quality. [170a] refers to the need to protect soils: once soils are built on, they are lost to food-producing for the foreseeable future, as they would be difficult to return to a fertile state.</p> <p>The Friends of Dibbinsdale are aware that matters to do with green belt loss in this area are not just the concern of those involved in the nature reserve. All areas that are in the green belt which are also in the Dibbin catchment will affect us. Lowfields ,for example, on Eastham Rake, is another ancient woodland sited on the River Dibbin. Their waters are our waters obviously. And so are our concerns shared with The Friends of Lowfields. The reserve is not, nor wishes to be, an environmentally isolated wildlife island. The herons that fly overhead, the toads that migrate to our ponds, the badgers, foxes and hedgehogs that feed on our wild food, the kingfishers that feed on our fish and many more are represented in our appeal. Homes for us are a loss of homes for them. We oppose green belt development on Wirral.</p>

DOR REF	RESPONSE
DOR00900	<p>Plans to zone the village of Landican for housing development</p> <p>Pre-history</p> <p>1. Landican has been continuously occupied since the Stone Age. I have found heat shattered boiling stones which are a stone age relic in at least four locations.</p> <p>There is strong evidence for the existence of round houses in various places near the centre of the village. In 2006 an exploratory dig was conducted in one of the fields adjacent to the village. It found hazel charcoal in a sealed context which has been confidently dated to 2915 years before the present, equating to 1200 - 1010 BC. Subsequently, the University of Liverpool conducted a geophysical survey of the field, revealing several possible sites for round houses. In neighbouring fields ancient field boundaries betray their origins in the use of ox ploughing with the coming of the Iron Age. The lane leading to Storeton from Landican will date from at least as early as this period and probably back in the Stone Age.</p> <p>More Recent History</p> <p>2. The three farm houses in Landican at the Poplars, Home Farm and Old Hall Farm stand on the sites of Saxon long houses. At some stage people moved from round houses into long houses sharing the building with their cattle. In the 17th century with the coming of coal burning chimneys were added to these houses and the central fire place which burnt wood was abandoned. The beam at Old Hall Farm carrying the smoke hood is dated 1682. Also at Old Hall Farm there is a shippon built of sandstone which would have been the first building occupied by the cattle after they were removed from the farm house. Both Old Hall Farm and Home Farm have or had cess pits associated with the cattle more recently used as cellars. There were three thrashing barns built for the storage of sheaves (oats, wheat and barley.) One at the Poplars has since been demolished, leaving just a low end wall. The barns were originally oak timber framed on a sandstone plinth and have subsequently been rebuilt in brick, retaining the plinth. In the 19th century each barn had a horse driven thrashing machine replacing earlier hand thrashing.</p> <p>Present Day Considerations</p> <p>3. Landican Road was built in the 1930s to only half its intended width and without a footpath for pedestrians. Traffic has been recorded using it at 92 miles an hour. The older part of Landican Lane is narrow and winding with many blind corners and no provision for pedestrians. Both roads are used at rat runs by drivers avoiding congestion on the main roads. The sewer through Landican carries both surface and foul water and is overloaded in the increasingly wet weather we are experiencing. The Fender Valley Sewer Network is acknowledged to be overloaded. The failure of United Utilities to maintain the sewers over recent decades has not helped. The land at Old Hall Farm is used for grazing cattle which occasionally stray, as a result of people cutting the barbed wire and leaving gates open. Putting a development of thirty dwellings in the centre of the village would lead to potential conflicts. Farming is a noisy smelly dusty and muddy operation, none of which townspeople appreciate.</p> <p>More General Considerations</p> <p>4. By default, a national policy has been allowed to emerge of closing down farm yards, developing them for housing and then farming the land remotely from a remaining yard. This has meant that farm traffic has to use public roads, which are already congested, so adding further to the congestion. It is now clear that within the foreseeable future, large areas of productive farmland will be lost to the rising sea level. Planners should therefore place a higher value on open farmland than they might otherwise do.</p>
DOR00901	<p>My objections are firstly on the general principle and secondly on specific matters concerning Barnston Village where I live and have done so for the past 35years.I emphasise the word VILLAGE.</p> <p>GENERAL</p> <p>The stated need to provide 12000 Homes in the next 15 years appears to be based on a significant misconception of need.</p> <p>I support my statement by using Wirral Council's own figures contained in Wirral Compendium of Statistics 2018.</p> <p>Table 1H shows the population of Wirral to be static over the last 21 years.</p> <p>I.e. 1996. 322,700.</p> <p>2017. 322,800.</p> <p>Further analysis shows that the population in the under 49 age group is decreasing and the figures only remain in balance due to the increase in the 50 and over group who presumably already have houses.</p> <p>NEXT. I refer to Table 1 (1)</p> <p>Here, Council projections show projected population growth from 322,800 to 327,800 over 15 years and only to 328,300 by 2038.If these projections prove to be realistic it suggests a need for around 2000 houses not 12000.This number could easily be provided by use of available Brown Field Sites without the need to touch a blade of grass on our green and pleasant fields which contribute so much to our environment and the character of our villages.</p> <p>The Council should mount a vigorous challenge to Central Government to amend their recommended targets and go back to the drawing board with a more enlightened plan before it is too late.</p> <p>I now refer to Barnston Village, part of which is a CONSERVATION AREA, as is Barnston Dale. Barnston Conservation Society has already put forward a most comprehensive and detailed submission</p>

DOR REF	RESPONSE
	<p>aimed at protecting the nature and character of the village, so I merely add a few personal observations. Any development on site 0871 appears to include a need for compulsory purchase of Fairfield and Woodcroft. Bank Farm may be under threat for the same reason. This, frankly is a disgraceful proposal. We are not talking here about developments like a fourth runway for Heathrow Airport or the possible HS2 rail development the sort of projects which sadly can only be achieved with the aid of compulsory purchases. On the Wirral we have endless opportunities without knocking down EXISTING houses and destroying working FARMS.</p> <p>Then there are the logistical problems which would inevitably arise. Any developments involving sites 0870 and or 0871 would seriously exacerbate problems which already exist. The final 150 yard stretch of Storeton Lane as it feeds into the T Junction to B 551 is so narrow that 2 cars can barely pass. There is no pavement at all. Nervous drivers await the road becoming entirely clear before attempting to enter which can take considerable time at times of peak usage causing frustration and bad temper to those waiting behind. B 551 is already an accident black spot. It is a main thoroughfare to Arrowe Park Hospital, with the road also extremely narrow, steep and twisting as it passes The Black Horse public house. In turn the pub itself is only 3 feet or so from the road thereby preventing any possible road widening.</p> <p>It should also be mentioned that the site listed for possible development in Gills Lane also feeds into a semi blind T Junction of B 551 a mere quarter of a mile East of the Storeton Lane exit. Any physical inspection at peak times will clarify my comments.</p>
DOR00902	<p>Submissions on borough wide issues, settlement specific issues and site-specific issues having regard to clients land interests and a vision for a new residential development on land at Heswall. Plan is considered to be piecemeal and it is highly likely to result in a Plan which is unsound. Council has already selected some sites it proposes to be allocated for housing and has identified some Green Belt sites that warrant further investigation for housing. Decisions have been taken in the absence of a full evidence base being available and that approach essentially pre-determines the contents of the Plan. How does the Council know that the sites it has already proposed to allocate and those it has earmarked for further investigation for release from the Green Belt are viable, achievable or deliverable? The Council needs to have a complete suite of evidence base documents in place before commencing formal consultation. It is wholly inappropriate for the Council to be signposting respondents to a pressure group's web site as part of what is meant to be a fair and transparent consultation process. It would have been far more appropriate to have signposted respondents to the Planning Practice Guidance or for the Council to have produced a short unbiased guide itself.</p> <p>Housing need - standard method relies on past growth trends, which in the case of Wirral have been adversely affected by a record of persistent under performance with regard to housing delivery and a lack of Plan led housing allocations. Council's position does not recognise the potential change to the standard method that has been in the pipeline and does not take account the economic development factors. No allowance appears to being made by the Council for flexibility. SHLAA needs to be put in place before the Plan is taken any further. Concerns with regard to the housing land supply figures reported to Cabinet in July 2018 and copy of the appeal decision enclosed. The Council has made it clear that there is a shortage of land for development within the urban area to meet the needs of the local population and the economy; and that it would not be possible to meet these needs within Wirral without releasing land from the Green Belt. It is our view that exceptional circumstances exist. The Green Belt assessment is welcomed. The dataset needs to be more clearly set out to enable adequate consideration.</p> <p>Land South of Riverbank Road - Green Belt Parcel SP104 & SHLAA 1968 (map enclosed) Council's assessment concludes as 24% of the site's boundary is adjacent to the urban boundary then it is 'Not Enclosed'. We disagree and consider the site significantly more enclosed. Agree development would not reduce the existing separation, site would clearly result in some form of encroachment. Assessment states that SP104 is not suitable for release from the Green Belt.</p> <p>Commentary states that - The Wirral Way provides a clear boundary to the urban area in Settlement Area 7 and the more open coastline to the west. We fundamentally disagree with this as it is clear there is substantial existing development to the west of Wirral Way. Assessment goes on to recognise that the existing development to the south of SP104 could form a new Infill Village in the Green Belt along with a similar development opposite (4-14 Riverbank Road). The subject site (SHLAA 1968) could potentially have a single built up frontage on to Riverbank Road. The Council clearly recognise that the site is suitable for development despite some of the negative conclusions made in the Green Belt review. Whilst we welcome the principle of developing the frontage of the subject site there is an opportunity to develop the site further into the field as shown in the masterplan (submitted). This would take development in line with the existing dwellings to the south and deliver more dwellings in the Plan period in a sustainable location.</p> <p>Land North of Riverbank Road - Green Belt Parcel SP103 & SHLAA 1939. (Map enclosed). Council's assessment only 2% of the site's boundary is adjacent to an urban boundary and therefore classes the site as 'Not Enclosed'. We disagree with this rigid assessment. Site is clearly enclosed by defensible boundaries. Developing the site would not result in unrestricted sprawl as the site is contained by the coastline and surrounded by development / strong boundaries on three sides. We agree that developing the site would not affect separation. However, disagree with the conclusion that it would remove separation between SA7 and the coastline. Whilst the site is subject to a countryside use i.e. arable farming and developing the site would clearly result in some form of encroachment, as mentioned above, the site is enclosed by defensible boundaries.</p> <p>The site would be well contained by development that has previously been allowed by the Council in the past therefore any encroachment is offset and restricted. Council's Green Belt Assessment states that SP103 is not suitable for release from the Green Belt. For brevity we do not wish to repeat our views on this but refer to our conclusions on the matters under Land South of Riverbank Road above.</p> <p>One of the Options is to identify the existing properties 4-14 Riverbank Road as a new Infill Village with or without our client's land opposite (SHLAA 1968). We support the principles of releasing the land opposite the site along with the existing dwellings on Riverbank Road. However, there is an opportunity to take this further and release the whole of our client's land north of Riverbank Road to</p>

DOR REF	RESPONSE
	<p>allow a larger development as shown in the masterplan (submitted).</p> <p>Land South and North of Manners Lane - SP100, SP101 & SHLAA 1940 & 1941. According to the Council's assessment the southern site is classed as 'Rural' as none of sites boundary is adjacent to an urban boundary. We disagree with the rigid assessment. The site is clearly enclosed by defensible boundaries to the east by existing properties at Closeburn Avenue, Hilbre Avenue and Seafeld Avenue, to the south by the River Dee and to the north by Manners Lane. Developing the site would not result in unrestricted sprawl as the site is contained by these strong boundaries. The site is at least 'Partly Enclosed' according to the Council's methodology which we disagree with anyway for the reasons previously stated. The northern site is classed as "Not Enclosed". However, the site is enclosed to the south west by existing dwellings at Marine Drive, to the north by existing dwellings at Park West, to the south east by Manners Lane and to the Wirral Way. We agree that developing the site would not affect the separation. Developing the sites may be considered to remove separation between existing developed areas however the site clearly suitable for infill development as recognised by the Council under Options 100.2 & 101.1 in the Summary of Initial Green Belt Assessment. Developing the site would clearly result in some form of encroachment. The site would be well contained by development that has previously been allowed, therefore any encroachment is limited. The sites are suitable for infill development as recognised by the Council. The Council's Green Belt Assessment states that SP103 is not suitable for release from the Green Belt.</p> <p>For brevity we do not wish to repeat our views on this but refer to our conclusions on the matters under Land South of Riverbank Road above. One of the Options is to identify the existing properties 4-14 Riverbank Road as a new Infill Village with or without our client's land opposite (SHLAA 1968). We support the principles of releasing the land opposite the site along with the existing dwellings on Riverbank Road. However, there is an opportunity to take this further and release the whole of our client's land north of Riverbank Road to allow a larger development as shown in the masterplan (submitted). South of Banks Road & North of Wittering Lane SP098 & SP110, SHLAA 1938 & 1967. According to the Council's assessment the sites are classed as 'Rural'. We disagree with this assessment. The site is at least 'Partly Enclosed' according to the Council's methodology. Agree separation would not be reduced. Site would clearly result in some form of encroachment, as the site is partly enclosed by existing development and strong boundaries therefore any encroachment into the countryside is limited. Council's states that SP110 and SP098 are not suitable for release from the Green Belt but goes on to suggest under Option 110.2 that SP110 could form a new Infill Village in the Green Belt. We agree with the principles of releasing SP110 from the Green Belt and specifically our client's site. However, there is an opportunity to take this further and release more land south of Banks Road to create a larger, sustainable development which would contribute more to the Council's housing needs and deliver significant new community benefits. Future Green Belt Boundaries - Release of the site would ensure consistency with the emerging Development Plan's strategy for meeting identified requirements for sustainable development. It is unnecessary to keep the land permanently open. As discussed above, each individual site has a good degree of enclosure by strong boundaries.</p> <p>If an allocation is unsuccessful the land should at least be safeguarded in order to meet longer-term development needs.</p> <p>The boundary of the Green Belt could be clearly defined at boundaries adjacent to our site which are readily recognisable and permanent. the sites are enclosed by defendable features or existing development. Realignment of the Green Belt boundaries resulting in the removal of the sites from the Green Belt would accord with Paragraph 139 of the revised Framework.</p> <p>Safeguarded Land - Council has already signalled that it is unable to meet all of its housing needs. It is logical to conclude that any future Plan review is likely to reach the same conclusions. The Council should also be planning to safeguard land and remove it from the Green Belt as release is highly likely to be required in the future. If our client's sites are not allocated for housing they should at least be removed from the Green Belt and safeguarded for longer term development needs. The Plan should provide triggers which would indicate when the safeguarded land would be considered for release, through a Plan review.</p> <p>The Case For The Release Of Green Belt Land At Heswall - There is no reason why Heswall could not accommodate further growth. There are a range of amenities adjacent to the site including a number of primary schools, two medical centres, a collection of pharmacies and dental practices, a petrol station, a variety of pubs, cafes, restaurants, shops and a range of community facilities, churches, sports clubs and recreation grounds. A number of pedestrian routes connect Heswall to the Wirral Way coastal path and across the Heswall Dales Nature Reserve. Two bus services operate from the stops situated to the north of the site (at Banks Road and Broad Lane), with one bus running on a daily basis and the other on an hourly basis. A third bus service operates from the south of the site (at Riverbank Road) on an hourly basis. Heswall Railway Station is approximately 2 miles east of the site and provides regular services to Wrexham and Bidston, with trains from Bidston travelling to West Kirby and Liverpool. Nearby local facilities and public transport connections make the site a sustainable location for future development.</p> <p>Deliverability - Client has secured legal agreements with the landowner of the sites for their release from Green Belt and promotion for residential development. Client is committed to the sustainable development and can ensure permission is sought for a minimum of 410 new homes to help meet Wirral's housing need. If the site were released from the Green Belt, client would seek prepare and apply for planning permission immediately. The sites are suitable for housing development because they offer a suitable location on the urban edge of Heswall and are enveloped by existing development and the Dee Estuary. They can be developed immediately, have recognisable and defensible boundaries; have no identified environmental constraints; would deliver significant public benefit in addition to new housing including much needed affordable housing, highway improvements and wider network improvements, and enhanced biodiversity habitats and open space provision. They are highly sustainable and are within walking distance to local services and facilities located in Heswall. The submitted Vision Framework demonstrates that the sites could deliver a minimum of 410 dwellings which would make a significant contribution towards meeting the housing needs of Wirral Council. This technical work undertaken to date has not identified any restricting constraints for development. Development is therefore achievable. The site could be brought forward as a single entity or in discrete parcels thereby accelerating delivery. If the sites were allocated for development the Council could expect to receive a planning application within 6 months of the adoption of the Plan and subject to that application being approved it is highly likely that a</p>

DOR REF	RESPONSE
	significant number of the total dwellings proposed would be delivered within 5 years.
DOR00903	<p>My objection to proposals within the Council's current Development Options Review to include parts of Wirral's Green Belt as sites for development in its much belated Local Plan. Others better informed than I will challenge the Council's assessment of minimum need, (originally put at circa 12,000 dwellings over the 15 year plan period with a shortfall of 4,990) based on the Government Standard Method and 2014 Office for National Statistics (ONS) projections. This is despite a steady decline in population and contradicts a March 2018 statement by the Secretary of State that 'This is not an area of high housing pressure'. I understand that a recalculation of need based on the same method but using more recently published 2016 ONS figures (published during the subject consultation period) significantly reduces the assessment of minimum need to 7,320 over the same 15 year period with virtually no shortfall. Even so, I am assuming that the ONS figures reflect a national picture of population growth whereas Wirral has experienced the opposite. In calculating shortfall, I question whether the Council has made adequate allowance for the following:-</p> <p>Wirral Waters - I believe the Council has allowed in its calculations for just an initial tranche of 1,100 dwellings which the developer, Peel Holdings, expects to deliver within the next three years. Given that Peel have stated that they foresee delivery of as many as 6,450 dwellings over the period to 2035 (and more beyond then), for the Council to make no additional allowance here seems extraordinary.</p> <p>Planning Consents - Unless it's included in what the Council has allowed for Windfall Sites (see below), it also seems extraordinary that the Council doesn't appear to have included an allowance for sites, not otherwise categorised, that have been granted planning consent being brought forward for development. Surely there are statistics somewhere on which the Council could rely in making an allowance for likely conversion rate.</p> <p>Regeneration - I assume that the Council has already included in its calculations the 3,626 dwellings that it expects could be built on the various brownfield sites included in Part 1 of its Brownfield Land Register published in December 2017. By definition, the Council has determined these to be 'suitable, available and achievable'. That said, the sites listed barely scratch the surface of regeneration opportunities remaining within Wirral of which Wirral Waters is just one - one of the five purposes of Green Belt according to The National Planning Policy Framework July 2018 being 'to assist in urban regeneration by encouraging the recycling of derelict and other urban land'. Development on Green Belt may seem tempting compared with the time, money, effort, resource, skill and imagination needed to demonstrate the deliverability of a successful regeneration project but, unlike the former, the indirect value the latter generates in terms of regenerating sense of place and spin off into other sectors can be immeasurable.</p> <p>Changes of Use - In towns and cities across the UK there are many examples where residential use has brought new life to buildings previously used for non-residential purposes. For example, shops left vacant as High Streets shrink, and office buildings (particularly pre 1990) which have become functionally obsolete. For each, conversion to residential use now has Permitted Development status. With the growth of internet shopping in particular, we have already witnessed dramatic changes in the retail sector resulting in many closures - there are only so many charity shops! How and where we do business and advances in technology have accelerated the obsolescence of office buildings, a trend that will continue. Birkenhead alone offers many opportunities. I question whether the opportunities there or elsewhere in Wirral have been taken into account in the Council's calculations.</p> <p>Windfall Sites - The Council has included just 60 dwellings a year coming forward that are not foreseeable. That seems pretty small, particularly if this is where the Council has made allowance for sites that already have planning consent but have not yet been brought forward for development (see above). Also, across the Wirral we are seeing the trend for houses set in large plots being demolished and replaced with multiple units, often apartments, market driven by the high value of land for building and people wanting smaller gardens. I suspect these alone might approach, if not exceed, the Council's annual allowance. I see this trend continuing. Furthermore, I understand that the Council is able to include in its allowance for Windfall Sites, properties that have been brought back into residential use. I believe these amounted to 290 in 2016/17 alone and that the Council is targeting a further 1,250. National Planning Policy Framework states that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified. I don't believe the Council has demonstrated that any such circumstances exist. What does seem exceptional here is the Council's persistent refusal to prepare a Local Plan, doing so now in haste under threat of intervention and including ill-founded controversial proposals that would have a permanent and hugely detrimental effect on the Wirral and causing much distress to residents in the process. In needlessly reviewing the Green Belt, the Council appears blind to its significance. It's why many Wirral residents live and spend their money here and bring up their families. Many families have lived here for generations, often having left and returned. It's why visitors come here to enjoy the landscape, the internationally important Dee Estuary, the biodiversity and the many recreational opportunities that our wonderful peninsula has to offer.</p> <p>Not all residents earn their living here but live here out of choice because of what it is and commute throughout Merseyside, Cheshire, Greater Manchester and North Wales.</p> <p>I believe the Council has decided that the Wirral Way should be a high level boundary and that 'land to the west of the Wirral Way has not been included (in the list for further investigation) because of the role of the Wirral Way in defining a clear physical edge to the existing urban area and the constraints associated with national and international designation of the Dee Coastline.' It is therefore a puzzling contradiction that, presumably in an effort to circumvent Green Belt protection, the Council is suggesting that at some point during the plan period, the substantial area of Green Belt in Heswall that lies between the Wirral Way and the estuary and between Target Road to the North and Cottage Lane to the South be one or more 'Infill Villages'. Collectively these add up to a substantial area of what is largely agricultural land which would be lost to development that would largely obscure the estuary from view from the Wirral Way (particularly the Davenport Road section and large sections north and south of it) and devalue the Wirral Way's importance as a country park. It would destroy the openness already recognised by the Council as important to the Dee Coastline, destroy habitat, damage the recreational value of the area and put enormous strain on already limited and over utilised roads and other infrastructure.</p> <p>I know that in many ways I am simply adding my voice to the many submissions that the Council will receive in response to this consultation. I do so as one who was born and brought up here and, as</p>

DOR REF	RESPONSE
	<p>well as my wife, has spent almost my entire life living on the Wirral, working in Liverpool and bringing up our family here. The Wirral is special. We owe it to future generations to keep it that way. We overlook that at our peril.</p>
DOR00904	<p>Objection to your Development proposals in the strongest possible manner.</p> <p>Vineyard farm is a viable and valuable part of the local community and produces a range of much needed agricultural foodstuffs which serves both the local community and those further afield. Through the high quality of its land, Vineyard farmland provides significant and much needed high quality oxygen levels to enhance local air quality, thus meeting one of the demands of the recently published Agricultural bill (September 2018). This is only one of the reasons that it is imperative we obtain guarantees from the Council to protect our farmland from the clear greed of the local developers and their shareholders. I understand that at least one of the buildings on Vineyard farm is listed and subject to a preservation order. I am concerned that this will be at risk of irreparable damage in the event of construction. I am also aware that the site of Vineyard farm has a significant historical importance, both locally and nationally. My research has indicated that Vineyard farm could be the site of the Battle of Brunanburh (937AD), consequently it is important that we preserve this area for both the current and future generations. The infra-structure serving the population in the Poulton area is at its maximum now, and cannot be expected to meet additional demand without significant disruption and expensive upgrade. I understand that amenities serving the current housing demand would require major investment and improvement to meet any more. The proposed resulting disruption to the local community is intolerable. There is a wide range of flora and fauna which is enjoyed by many, throughout all seasons of the year, with each playing an important role in the food chain. This meets yet another target laid down in the aforementioned Agricultural policy. Vineyard farm provides sustained long-term employment for a number of local people, both on the farm and in the associated support services. Currently, the traffic levels in the Spital/Poulton area are rapidly spiralling out of control.</p> <p>Being a major access point to junction 4 of the M53 motorway, the area around Spital crossroads is struggling to cope, particularly during the weekday peak periods of 7:00-9:00am and 4:00 to 6:30pm. Additionally, owing to the fact that it is also a major access route to the Croft retail park in Bromborough, the ensuing traffic chaos continues throughout the weekend. Not only do we have a constant stream of traffic, but the resultant noise and fuel pollution is exacerbated, challenging the local air quality. Additionally, as a result of this, the accident rate in the area has increased markedly. We cannot tolerate any more. I understand that the local schools, general practitioners and dentists are currently at maximum capacity, with long waiting lists for many. For instance, as you are probably aware, there is a significant fall in the number of GP's available nationally, and Wirral is suffering like many other areas of the country. This will have a major impact on patient treatment, in this area. I am also aware of the fact that the local schools are over-subscribed. There are long waiting lists for all and this has meant that many parents are having to resort to driving their children to schools out of the area, causing even more road traffic chaos (see earlier). I understand that the recently updated and published analysis of housing demand for the Wirral peninsular for the period 2020 to 2035 is only 7155. This is a reduction of over 40% on the original and flawed estimate of 12000, suggested earlier. I expect this to fall even further, reflecting the reduction in the Wirral population.</p> <p>Net migration into Merseyside, including Wirral, is now falling and expected to continue (Liverpool Echo, 23rd February 2018), it was reported to be down by 1000 in 2017. Additionally, I understand that nationally, the birth rate from 16-24 year olds has also fallen (The Independent 20th November 2017). In addition to this, it is expected that Brexit will have significant further impact to reduce the population of the Wirral. As a consequence of this new forecast, an average requirement of only 477 units per annum, during this period will be required. At the council meeting on Monday 15th October, the deputy leader of the ruling labour group proudly announced that currently 200 houses per annum are being put back into the housing market by the council. I understand that the council have somewhere between 4000-6000 housing units under their control which can still be put back onto the market. The recent independent report by Sky News (Friday 21st September 2018) confirms that this housing stock is affordable and of sufficient quantity to meet current demand. Additionally, I understand that there are over 100 "brownfield" sites identified locally, many of these now under the control of Peel Holdings Group and other private enterprises, that could provide more housing units than is necessary to meet the shortfall. If the Wirral Waters project is eligible for "significant" government grants, why are these projects not being encouraged by Wirral Council? Further research has indicated that Magenta Housing also have around 1600 unused housing units under their control. Why are these not being utilised? What is going on here? I am also aware of a fall in the economic growth on the Wirral peninsular, and the long-term viability of some of the regions larger employers is unknown to us at the moment. For example, two of these are in motor industry (Jaguar Land Rover and Vauxhall Peugeot). Both of these employ a number of people from the Wirral, both directly and in associated supply industries. Both have recently announced and implemented changes in their production schedules. If either or both of these firms scale down or close production (BBC website, 11th September 2018), this will have a major impact on the local population and subsequent housing demand, causing many to leave the area. Additionally, there are no guarantees that the quantity of these jobs or employment skills would be replaced. It is clear that nationally we are fast becoming a service-based economy, thus producing need for less manual employment, and this is evident in our local industries too. Upon reviewing your published plans, it is quite clear that any housing project of this scale on this land would further eliminate the delineation between Spital and Bromborough. Both communities would lose their identities, thus becoming one large area of urban sprawl. Neither community want this to happen, as any development would only serve to mar the character of the area.</p> <p>Proposed damage to Dibbinsdale and its protected wildlife</p> <p>Previous applications to build houses in this area have highlighted the fact that damage and subsequent loss of local wildlife would be sustained. The area surrounding and adjacent to The Vineyard farm has been designated of significant scientific interest. Any large scale industrial building project will have a massive detrimental impact to the area. The local area sustains a variety of wildlife including</p>

DOR REF	RESPONSE
	<p>the rare red-legged Pheasant, Canada geese, Woodpeckers, Bats, a variety of birds of prey including Owls, Buzzards, Sparrowhawks. All of these species and many more, thrive and provide much pleasure for the local population, largely due to the vital oxygen producing high quality farmlands of Vineyard farm. Loss of this environment would have a major detrimental effect. As expressed earlier acres of valuable farmland would be decimated and this would be catastrophic for the local economy. The high quality soil and air quality currently produced would be lost forever, meaning that it would never to be recovered resulting in a major negative impact on the local economy.</p> <p>Access to the Vineyard farm area is predominantly via the Spital crossroads. However, there are also a large number of people who use the route via Dibbinsdale Road as a short-cut towards Junction 4 of the M53 and beyond. This route takes them over a small bridge over the river Dibbin. I am aware that civil engineers have previously deemed this bridge to be weak, and in view of the current volume of traffic using it, have designated it unsuitable for high volume traffic. However, on many occasions, I have also witnessed large HGV traffic using it, in contravention of local traffic regulations. This problem will only increase, in event of any building project, resulting in an increase in traffic of both HGV's and cars. Clearly, the bridge will not be able to sustain this, and will collapse, causing long term chaos and disruption throughout the wider region.</p> <p>During the Wirral Council meeting at Wallasey Town Hall on 15th October 2018 "I witnessed a clear majority vote of 59 votes to 0 in favour of Motion 3 "Keeping the builders hands off our farmland". In view of this, your observations would be appreciated.</p>
DOR00905	<p>1. Overall, both demand and supply figures presented as evidence by Wirral council have significant errors – demand has been over-represented, and supply under-represented. When these errors are taken into account, there is no credible evidence base to justify the exceptional conditions which would be necessary to alter the existing greenbelt boundaries.</p> <ul style="list-style-type: none"> • The ONS projections used are outdated and the more recent 2016 figures, published on 20th September 2018, are significantly lower. • The Background Document SHLAA April 2018 has not been published • the 'buffer' has been incorrectly ADDED to the overall total, rather than brought forward from later in the plan period • On supply, a 'Brownfield first' approach should be taken to protect unnecessary loss of greenbelt. The brownfield register for Wirral is not complete. • Historic and projected infill and windfall figures are insufficiently evidenced and should be properly investigated • Projections for capacity to be delivered through the Wirral Waters scheme on brownfield land over the plan period have not been adequately represented in the local plan consultation (as per letters from [Director of Peel Holding] to Margaret Greenwood MP, 13th August 2018 and [council leader], Sep 10th 2018). The Wirral Waters scheme alone could meet the majority of the housing demand projection in Wirral, without need for loss of Greenbelt. <p>In the light of the above, I would suggest that a new analysis of housing requirement and supply be carried out and subject to consultation.</p> <p>2. There has been insufficient consideration of sustainable development approaches, a key aspect of the NPPF guidance.</p> <p>Higher density housing in existing population centres, with smaller dwellings, well served by public transport and existing local amenities, would be a better solution to the housing challenges over the next 15-30 years (Build upwards, not outwards). The current housebuilding trend should be towards town centre flats, rather than detached houses in rural settings. This increases energy efficiency, and is more suited towards the requirements of an ageing population. Done properly, it also improves community cohesion and reduces social isolation. Co-housing developments, with passivhaus standard housing stock, with high housing densities, such as at Halton near Lancaster, are an example of the type of development that should be encouraged. Retrofitting existing housing stock to make it more energy efficient is of great importance if we are to slow the march of climate change. Development in the greenbelt takes away the imperative to improve the energy efficiency of existing stock, much of which - in the major population areas - is now around a century old. The resulting emissions are a significant contributor to climate change. Sustainable transport is vital. Public transport infrastructure in rural areas is already insufficient for current needs, requiring an increase in private cars, with associated parking and increased highway infrastructure demands. If additional housing were to be built on greenbelt land where there is no regular Merseyrail railway connection (or high-frequency bus service) within walking distance, people will be forced to use unsustainable transport options, causing an increase in vehicle emissions with public health and climate change implications.</p> <p>[Includes two attached letters] [Supporting correspondence to MP & Councillor attached]</p>
DOR00906	<p>We are being asked to comment on a Plan without knowing exactly which numbers will be used. The councillor has said at the Wirral West Constituency Meeting of 4 October that the Government will start a consultation exercise starting on 3 December, but the closing date for comments is 26 October. In fact, the draft report is being presented to Cabinet on 17 December when the actual housing numbers may still not be known.</p> <p>All brownfield sites have not been considered and the brownfield register is not complete. As there are sites in urban areas which could be built on before encroaching onto the Green Belt, Wirral Council are not complying with either paragraphs 119 or 134 of the NPPF. One of the purposes of Green Belt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. I cannot see much of this in evidence in this Plan. Peel Holdings have said that they can build up to 6,450 homes during the life of the Plan, but this number has not been used when calculating housing numbers. We have been told that the Council are currently waiting for Peel to submit their analysis to see how they can justify their numbers, so not only are we unaware of the housing requirement over the life of the Plan, we also do not know the realistic number of dwellings that can be built on brownfield sites. How can we be expected to make informed comments on the Plan when there are so many unknowns?</p>

DOR REF	RESPONSE
	<p>Sites SP030 and SP033 are areas being considered for release from the Green Belt. They are large areas, which if released, will have no protection from development. Urban sprawl will take place. This would violate the first purpose of Green Belt and also the third purpose which is to safeguard the countryside from encroachment. I am horrified to see that the site SP030 has an allocation of up to 1,467 houses which is totally unacceptable. Although it is said that other protections will be in place to stop development, there is no guarantee of this in the future, should the site be removed from the Green Belt's protection.</p> <p>SP030 currently serves 4 of the 5 purposes of Green Belt. Mountwood Conservation Area is also to the immediate north east of this site and any development would affect the setting of this area. Any building on SP030 will reduce the physical separation of Bebington SA4 and Thingwall SA7. It will also remove the physical separation of Prenton SA3, Bebington SA4 and Little Storeton.</p> <p>SP030 is one of the largest strategic land parcels in the Local Plan covering 150.95 hectares. To say 56% of this land is adjacent to urban area is misleading. This parcel of land covers a huge area. It needs to be considered by reference to its many constituents parts – none of which remotely reaches the 56% "test".</p> <p>Sites SP030 and SP033 are not in areas of highest accessibility as per appendix 20 of your Development Options Review Documents. 47.41 hectares of land, 31.4% of total area on SP030, are classed as being in the Liverpool City Region Core Biodiversity Area. 14.51 hectares of land are classed as LCR CBA on SP033, as per appendix 7 of the same document.</p> <p>There is an error in your Summary of Initial Green Belt Assessment September 2018. On page 52 (copy added) the agricultural land use for SP030 has been classed as pasture and horse grazing. In fact, the land under SHLAA1819 on site SP030 is actually used for farming arable, and has been for many, many years. Recent soil reports show the site as containing very good quality soil. In the summary of initial Green Belt Assessment for Public consultation, only 18.6% of the land in SP030 is classed as Best & Most Versatile Land. It would appear that this information is out of date and incorrect. The figure is much higher. SHLAA1819 has already had a crop harvested this year and is currently growing winter wheat.</p> <p>SP030 currently serves 4 of the 5 purposes of Green Belt. Mountwood Conservation Area is also to the immediate north east of this site and any development would affect the setting of this area. Any building on SP030 will reduce the physical separation of Bebington SA4 and Thingwall SA7. 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Therefore a very large proportion of SP030 is actually used for arable farming and not horse grazing as indicated. At a Council Meeting on 15 October, Motion 3 was voted on and carried unanimously. The first paragraph of this motion reads, "This Council requests that renewed importance should be attached to the protection afforded to agricultural land as the responses to the Local Plan are considered. Land that is currently in productive agricultural use should not be removed from the Green Belt in view of the need to safeguard future food supplies"</p> <p>As this parcel of land abuts Marsh Hey Covert, and covers an area between Marsh Hey Covert and a copse behind Stanley Avenue, the notes should also include that the area may include supporting habitat, as there is substantiated evidence of badger activity, bats and barn owls in this area. The areas also give protection to other local wildlife whose natural habitat will be eroded by any development. There are also 2 copses in SP030 which are covered under TPO 390.</p> <p>Any building on any of the sites SP030, SP035 and SP033 would affect the setting of Storeton Village. This would also violate another purpose of Green Belt which is to preserve the setting and special character of historic towns.</p> <p>Lever Causeway and the surrounding fields provide an area of outstanding beauty. The long tree lined road provides an unequalled visual amenity. The area is used recreationally by many people from all over the Wirral for walking, jogging, cycling and riding. Whatever time of day you visit this area, you will always see people exercising and spending their leisure time there. Wirral is known for its Green Spaces and this area is one of the most famous on the peninsular. It has historical significance as it was built by Lord Leverhulme in 1912.</p> <p>Green spaces are vital for our well-being and the NPPF reiterates this. Paragraph 91 states that planning policies and decisions should aim to achieve healthy inclusive and safe places which....c) enable and support healthy lifestyles especially where this would address identified local health and well-being needs for example.....layouts that encourage walking and cycling.</p> <p>Your notes on SP030 in your summary of initial Green Belt Assessment, state that part of the remaining open land between the urban edge in Bebington and the M53 Motorway is situated on a rising hillside visible from the M53 Motorway. The highest part of this area is on Mount Road adjacent to site SHLAA1819. Any building in this area will therefore have a disproportionate effect on the rest</p>

DOR REF	RESPONSE
	<p>of the area. The development will be highly visible to any remaining Green Belt and any views will be lost.</p> <p>To conclude, there is no need for any Green Belt to be released for development. Sites SP030, SP035 and SP033 should not be built on because of their exceptional beauty, public amenity and agricultural use. Exceptional circumstances have not been demonstrated to require the release of Green Belt.</p> <p>The whole consultation process the Council has followed is flawed, so flawed that could find itself open to a legal challenge.</p>
DOR00907	[SAME AS DOR00455]
DOR00908	<p>I loved living here because of its proximity to rural areas .</p> <p>Whenever we went anywhere away from town, as soon as we reached the Lever Causeway, we felt we were in the countryside, and were excited to get a first glimpse of the Welsh mountains. Greenery and a sense of space is really important for people who live in an urban area, and the view from Mount Road across the fields gives us just that, as do many other viewpoints in the Wirral. We MUST protect this for the next generation, so that they don't grow up in an urban sprawl, stretching from the centre of town right out to the surrounding areas of Bebington, Bromborough, Pensby etc across the Wirral, without any pockets of greenbelt.</p> <p>Wirral is lucky enough to have many scenic cycle routes, running routes and walking routes across these green belt areas, and these need to be protected at all costs.</p> <p>We have used these routes repeatedly over the years, first with our children when they were growing up, and more recently since our retirement, often walking out to Storeton Woods for example, or cycling to Thornton Hough and beyond. My favourite run from Oxton was out to Storeton Village and back.</p> <p>We are supposed to be encouraging people to do more exercise, and surely, they are likely to do LESS if they no longer have such routes available to them.</p> <p>Additionally, there would appear to be enough brown belt land available for new housing if it is required.</p> <p>We must stand up for the Green belt areas at all cost.</p>
DOR00909	<p>There is an error in your Summary of Initial Green Belt Assessment September 2018. On page 52 the agricultural land use for SP030 has been classed as pasture and horse grazing. In fact, the land under SHLAA1819 on site SP030 is actually used for farming arable, and has been for many, many years. Recent soil reports show the site as containing very good quality soil. SHLAA1819 has already had a crop harvested this year and is currently growing winter wheat. The land further down Lever Causeway between Marsh Hey Covert and Little Storeton Village is also being farmed. Therefore a very large proportion of SP030 is actually used for arable farming and not horse grazing as indicated. At a Council Meeting on 15 October, Motion 3 was voted on and carried unanimously. The first paragraph of this motion reads, "This Council requests that renewed importance should be attached to the protection afforded to agricultural land as the responses to the Local Plan are considered. Land that is currently in productive agricultural use should not be removed from the Green Belt in view of the need to safeguard future food supplies."</p> <p>Also, as this parcel of land abuts Marsh Hey Covert, and covers an area between Marsh Hey Covert and a copse behind Stanley Avenue, the notes should also include that the area may include supporting habitat, as there is evidence of badger activity, owls and bats in this area. The areas also give protection to other local wildlife whose natural habitat will be eroded by any development</p> <p>Watch the attached video as this is our traffic on a daily basis without any extra homes being built in our area! This would just become an absolute nightmare when trying to get out of our road to get the children to school and to go to work!!</p> <p>[Additional comments were provided in the form of a table & a video attachment]</p>
DOR00910	<p>The proposal suggested infill around Riverbank Road, e.g. between 5 and 7 to 9 Riverbank Road.</p> <p>My objection is based on the fact that development at the proposed infill location would destroy the openness of the Green Belt in this area.</p> <p>As a person walks along the road route of the Wirral Way at this location, a clear, far-reaching line of sight to open farmland and beyond to the Dee Estuary is maintained. Development along Riverbank Road between 5 and 7 Riverbank Road (or indeed on the opposite side of the road to that location) would block this view, as the gap between these properties is very large (over 200 metres). The proposal suggested that existing trees would mask any development but this is clearly not the case.</p> <p>It is also worth noting that the Riverbank Road access to the Wirral Way is the only location along the route of this path where a view along the estuary out to the Irish Sea is possible, thus development here would be politically as well as environmentally damaging.</p> <p>[Photograph of area attached]</p>

DOR REF	RESPONSE
DOR00911	<p>Wirral Borough council failed to deliver a local plan and failed to meet deadlines 6 times since 2004. Now they have 2 months to rush through a plan and consultations. Their plan is flawed and this site should not be built on for the following reasons:</p> <ol style="list-style-type: none"> 1. Wirral compendium of statistics for 2017 states that the predicted population increase will be less than 6000 by 2038. Therefore there is no reason why 12000 new homes are needed and WBC have not challenged the government's target of 12000 by 2035. This should be done before any release of greenbelt. 2. There are currently 4500-6000 empty houses in Wirral and other brownfield sites that with the developments at Wirral Waters would meet the actual demand. 3. Development is most needed in the rundown areas of north Wirral & new ferry. Building on this green belt land will not meet their needs. Most developments (approx. 84%) on greenbelt land are larger family or executive homes – very little is of the much needed affordable housing. 4. Building here will have a detrimental effect on the bats that live here. I have seen and counted over 35 bats fly in this field over the summer. The destruction of the pond in this field will severely affect the habitat of these bats as well as the birds that use it as an essential resource on their migrating flight pathway. 5. Building on the greenbelt with deprive Wirral of its 'Lungs'. Green spaces are required to counter act pollution and to benefit health and well-being. This particular field is accessible to all as it contains a public footpath and so should be conserved for all to utilise. 6. The impact of the infrastructure will be enormous – traffic congestion – not enough school places at both primary schools in Irby as it is and no GP surgery in Irby. Waste water is sent to Meols which will not cope with higher demands. 7. Greenbelt land is there to check unrestricted sprawl of large built up areas. We do not want Wirral to become 1 large conurbation. To lump Irby, Thingwall and Pensby together is wrong as they are separate places with individual character. <p>Greenbelt land is there to safeguard the countryside from encroachment and only exceptional measures can justify building on it, and there are none. Wirral Borough Council is adopting the easy option for the financial benefit of greedy investors and developers rather than planning for the needs and wants of the Wirral people.</p>
DOR00912	<p>I oppose and object to building on Green-belt land</p> <p>Despite hearing about the plan to build on the Wirral Green-belt I have recently bought a house on Mount Road, Bebington.</p> <p>Notwithstanding accusations of NIMBY-ism, understanding that housing may be needed, but I protest strongly, on the following grounds;</p> <ol style="list-style-type: none"> 1 for the benefit of all Wirral citizens, the green-belt provides, as it was planned to do, areas of open space for all to enjoy and benefit from 2 leaving Birkenhead on the B5151, direction Junction 4, Lever Causeway gives splendid views of the Wirral countryside, the hills of Clwyd, and in the distance, Snowdonia. This is a rare and amazing viewpoint. To obscure it with needless buildings is shocking. 3 needless building, because there is plenty of brown site land, both the dockland development area and recent slum clearance areas that should be used for low cost, affordable housing. 4 I hear that Birkenhead and the Wirral does not need more land allotting since (3) provides sufficient. 5 I hear that there is a decline in population due to the lack of employment, therefore housing for working people is not required, <p>This area is popular with walkers, cyclists, dog walkers and runners. Readily accessible from the build-up areas of Bebington, Oxtown, Prenton and Birkenhead generally.</p> <p>Fresh air, green views and exercise are all supposed to be good for health. Buildings, more traffic and pollution are said to be bad</p> <p>This was the intention of the Green-belt concept, and should be defended.</p>
DOR00913	<p>Object to the planning application for the building of houses on Lever's Causeway and the surrounding fields. The build would bring more traffic to an already busy road where tailbacks occur daily. The local wildlife will also be greatly disturbed. I hope that you take into account that, once Green Belt land is gone, it can never be returned! Wirral is famous for its open spaces and spectacular views. I therefore request that you deny this application.</p>
DOR00914	<p>Not satisfied with building a fire station in Saughall Massie I read with horror that plans are afoot to build over 900 dwellings on green belt and within the Saughall Massie conservation area. You don't need me to tell you the 5 purposes of green belt especially when there are brown field areas available. If you agree to these preposterous plans you will put the family out of their farming heritage and could lose Saughall Massie's village conservation area status which was granted in 1974. Apart from the increased traffic and air pollution together with the increased flood risk have you even thought as to where all these extra people are to find doctors dentists and schools in an area where schools especially are oversubscribed. Whatever the government say about the need for housing Wirral does not have the demand for extra housing especially as there are so many empty houses that should be used first. 40% of Wirral is currently protected within the Green Belt designation you seem hell bent on destroying our green and pleasant land. Shame on you.</p>
DOR00915	[SAME AS DOR00455]

DOR REF	RESPONSE
DOR00916	<p>Sent emails regarding my objections to Greenbelt land being re classified in order for it to become available for building.</p> <p>I feel strongly, that you should consider seriously the opinion of the majority of us, the general public.</p> <p>My reaction to news of valuable land in Lower Heswall being included in these plans was one of disbelief. Central government set out these plans for affordable homes, not executive homes built by greedy builders taking advantage of an opportunity! I have already submitted a lengthy list of objections, so have kept this brief.</p>
DOR00917	<p>Three main issues where I'd like to address my thoughts. The first being specific to what uses can be carried out on land identified for employment, the second being the proposed release of land from the Green Belt, surrounding Bebington and the third is the identification of High Quality Agricultural Land used for housing.</p> <p>My first point I would like to raise relates to the "Proposed Employment Allocations" document. I work for a renewable energy company and as part of my role, I have to identify suitable land near substations for certain renewable technologies. This is a technology which in its nature, is limited to where it can be located. The further away from a substation, the less viable the technology usually is. Many of the larger sub-stations are located in industrial areas where land has been identified for employment uses. I would suggest that "sui-generis" classes should be considered on such land. This is not made clear in the Proposed Employment Allocations Document and further guidance on Sui-Generis uses should be distributed to provide better certainty for both the public, developers and the Council when deciding applications. This is applicable across all of the land allocations, not just employment.</p> <p>Secondly, I would like to comment on the large amount of land identified in the Green Belt within the Bebington, Clatterbridge and Bromborough wards of Wirral. While I agree with the methodology behind selecting the sites, such as using enclosed sites and existing "boundaries", I do believe that in practice, this will lead to significant issues in these three wards, to which I wish to object. I accept that everyone in Wirral needs to accept their fair share of housing, I do question how fair Bebington, Clatterbridge and Bromborough's "fair share" is and I am concerned about the what the impacts are of such a large concentration of housing being proposed in one area? The B5137 Road for example, between Clatterbridge Roundabout and Spital Crossroads appears to be currently running at peak capacity from 7am – 9:30am then 2:30pm – 7:00pm during the rush hours and school runs. The junction with Brimstage Road (B5137) and Beechway for example is significantly congested and is dangerous enough as it is in its current state. Any increase in the net number of vehicles using these roads could seriously impact upon road safety in the area. Dibbinsdale Road between Vineyard Farm and The Dibbinsdale Inn in Bromborough is also of concern. More vehicles which will undoubtedly use this route which is likely to lead to accidents and/or severe congestion, particularly at the narrow and winding sections in the base of the Dibbin Valley. Provision of other services such as Schools, GP Surgeries, Food Shops and Dental Surgeries to name a few need to be considered, particularly at the level of housing proposed in one concentrated area between Bebington and the M53 Motorway. The current provision of services in the area is good, however these are nearing full capacity. By removing some sites from the Bebington area to elsewhere in the Borough would be favoured to reduce impacts on Local Services. This large concentration of proposed housing will have an unbearable impact on the area. Bebington's (and surrounding areas) CH63 postcode has been identified on two recent occasions as being the most desirable place to live and work in England. It begs the question that why is so much being proposed in the area which will change it. I fully acknowledge that some additional housing is needed. I am more concerned of how much there will be. I would strongly support that a CIL schedule is introduced as soon as possible to contribute to towards the cost of improving local services, particularly road infrastructure around Clatterbridge Roundabout and the surrounding "B" roads, as well as other essential amenities, before planning applications are approved on the new Green Belt sites.</p> <p>At Junction 4 of the M53, traffic regularly backs up onto the nearside live lane of the motorway, waiting to exit. This is due to congestion at the roundabout. Consideration of this is kindly requested by the Council and I assume Highways England have already been consulted on this.</p> <p>My final concern is that great swathes of High-Quality Agricultural Land (identified in the Initial Wirral Green Belt Review – Appendix 7) is being identified for housing. Once this land is formally identified as housing land, developers can build on this. Once houses are built, the agricultural quality of the land is decimated. At such an uncertain time, leaving the EU, I would be in strong support of protecting any High Quality Agricultural Land we have to protect food stocks and at the same time, retain / improve ecological features such as habitats and arboricultral assets in the field boundaries.</p> <p>I note in a recent article in the Wirral View (https://wirralview.com/news/council-leader-write-ministers-after-new-housing-figures-released), that new housing figures were released by Central Government. I support the Council Leader requesting a pause in the preparation of the Local Plan to ensure the figures are the most up to date. If it transpires that the Council only need to plan for 500 homes per annum, I'd fully support all "surplus" housing being removed from the areas of High Quality Agricultural Land areas as an immediate priority.</p>
DOR00918	[SAME AS DOR00455]
DOR00919	<p>Objections to the release of green belt land and have the following comments:</p> <p>Projected Population Growth</p> <p>No Government has determined how many homes are to be built by Councils since Labour's Housing Targets were abolished. All Wirral Borough Council's (WBC's) figures stem from the Office of National Statistics (ONS, a non-ministerial department, independent of Government, reporting directly to the UK Parliament). It is the ONS who have published revised figures recently, which are very helpful to the case against release of Green Belt and they should be correctly considered.</p> <p>WBC's own projections of Growth (of population and local economy) and those of their Consultants, together with ONS figures were applied to a Standard Formula (agreed by Parliament for all councils). WBC's Growth Predictions are exaggerated, a contention supported by the latest published data.</p>

DOR REF	RESPONSE
	<p>There is flexibility around the methodology of arriving at an 'Objectively Assessed Housing Need' (OAN) and Councils are urged by Government to challenge the 'formula' results in order that local and 'Exceptional Circumstances' are taken into account. WBC has NOT challenged Wirral's results in any meaningful way nor taken up the opportunities offered to discuss and develop the standard methodology, this should be carried out as a matter of course. Options for using inherent flexibility and arguing modification of the scale of Housing Need, though encouraged by national policy and the Secretary of State, had NOT been taken up meaningfully. 'Exceptional Circumstances' and historic Local Factors had NOT been pushed. WBC's past and current approach has led to widespread belief of a determination to release Green Belt to show some development is occurring and reap a financial benefit. This concern was heightened by the WBC Officer Presentations at recent Public Meetings and suggestions since the much lower ONS figures were released that some Green Belt will STILL be released. The Council has continued to argue its case (of inevitable and "enforced" release of Green Belt) even when there was updated data available (before the latest reductions) showing that their Growth assumptions were far too high, especially as the Local Plan process is required to keep up-to-date with relevant input figures. It did not keep up-to-date, this should be addressed.</p> <p>Brownfield Register</p> <p>Errors pointed out during WBC's Brownfield Register Consultation process have led to reductions of availability but few, if any, additions, with the Officer statement that those identified as additional would be reviewed/appraised next time ... i.e. in 15+ years. This approach is flawed and should be corrected.</p> <p>Wirral Waters</p> <p>WBC's response to enquiries why only 1,100 'Wirral Waters' homes were in WBC's Brownfield Site capacity figures was that detailed Planning Consent is necessary before schemes can be included. This is fundamentally incorrect and runs counter to the 2017 Appeal Court Ruling which made it clear to Councils, developers and others that developments only need to be "reasonably possible", not even "probable" and definitely not "certain" or of proven deliverability. This Ruling not applied as it will significantly tip balance towards NIL release of Green Belt? The Council has been had provided with its detailed appraisal of ALL Green Belt Sites within its Area (Irby, Thurstaston, Pensby, Thingwall, parts of Greasby, Barnston, Heswall) , using Criteria for exclusion from consideration publicly consulted upon by WBC and used in their Consultants' own Appraisals, plus the 5 Principles of Green Belt and other key factors in WBC publications. ITPAS's assessments (representing over 600 residents) and WBC's own Criteria for exclusion of Sites were almost completely ignored in the rushed and flawed shortlisting of 48 Green Belt Sites. This should be correctly reviewed and the shortlisting of the site re appraised.</p> <p>Generally</p> <p>Were the Council determined to protect Green Belt (as now claimed), why did it keep quiet for 2 years about its Consultants' conclusion in 2016 that Release of Green Belt land was inevitable? Surely, the Consultants would have been required to find circumstances where this was NOT inevitable, arguing a more reasonable, lower Growth Rate. Wirral Council are now compounding their lack of a 'Local Plan' with a rushed and flawed Review and Public Consultation. Their actions do not match their words about protecting our beautiful Green Belt on which the attraction and tourism of Wirral depend. On the contrary, the Council are still determined to release Green Belt for development even in the wake of much lower Growth Forecasts, from national and local sources.</p> <p>Wirral has vast untapped amounts of buildings and land outside of Green Belt to supply sufficient housing of all types throughout the Local Plan Period and beyond. To start with, Peel Holdings have confirmed up to 6,450 units can be delivered at 'Wirral Waters'. Yet, despite Officers confirming Phase One is "fully viable" due in part to a £6m Government Grant and New Homes monies, the Council have not included a single new dwelling in its First or even Second 5-Year Period and just 1,100 homes after 15 years, this approach should be corrected to reflect the potential of 6450 units. There are also thousands of Brownfield Sites and approved schemes, 16,000 existing planning consents and up to 6,000 empty houses to be brought back into use, plus opportunities for significant conversions, normal applications and 'Windfall' supply and more. Sadly, little is being made of such, whilst Officers appear happy to state that developers and the Council see greenfield development as simple, quick and lucrative. Their approach is unacceptable and needs to be corrected. The isolated nature of Green Field sites and access to facilities e.g. regular public transport, shops etc. has not been considered. The roads in and out of Irby, Pensby and Thingwall and the Arrowe Park traffic light junction will be incapable of accommodating any significant rise in road traffic densities. The impact upon core services such as schools, doctors will be severe if any extensive green belt development is carried out.</p>

DOR REF	RESPONSE
DOR00920	<p>I would like to lodge my objections to the proposed release of Green Belt land to developers for building of houses.</p> <p>I live on Thingwall Road, Irby, Ch61 3UD and the proposed sites to be released in close proximity to my property and general neighbourhood would have a detrimental effect on the local population living in the area.</p> <p>Firstly, there is no demand in the area for the additional housing and if the green belt land was to be released only executive style houses would be built in these locations, making the objective of this land release pointless. The infrastructure cannot cope now, the traffic and delays at Thingwall Junction / Landican Road during peak times is already unbearable. Loss of open green space will influence people's health, we already have an obesity endemic affecting the NHS service, no natural free space for walking and other leisure activities will increase this burden.</p> <p>My objections to the council releasing Green Belt land for development include the following points:</p> <ul style="list-style-type: none"> • Local population growth figures do not match the projected housing targets identified by the council/DCLG • A true examination would reveal the population of Wirral is declining. • Large number of empty premises and brownfield sites should be considered for development as a priority. • Planning applications that have been approved but not started because of harvesting by developers / agents, enforcement measures should be deployed to deter these actions by developers / agents. • Planning applications that are being delays, i.e., Wirral Waters (Peel) - Wirral Council should make this scheme a priority action and hold Peel Holdings accountable for delays and lack of action in redeveloping Wirral Waters. • There are declining areas of Birkenhead, Seacombe and New Ferry which are in desperate need of regeneration and improved social housing should be considered as first priority. • Lack of local and central government funding for infrastructure to maintain and upgrade the current infrastructure. • Existing facilities are stretched and underfunded, no margin exists for additional resource stretch cause by increase in local population. • Lack employment opportunities and dwindling industry in the area to provide employment for influx of population. • Limited employment opportunities for current population of Wirral. Only service industries which are low paid and underfunded available in local area. • Lack of investment by local and central government in local facilities, availability of which is declining. • Land values in my local area and others will not be sufficiently profitable to enable development of affordable houses, hence, executive more expensive homes will be built. • Isolated and remote nature of Greenfield sites and access to facilities, i.e., no regular transport routes and lack of local shops and amenities. • Total Loss of biodiversity and public access to open areas / spaces, e.g., access to natural habitats, woodland, footpaths, and bridleways. • Impact on wildlife in Green Belt areas. The Green Belt areas on Wirral are a precious commodity and under no circumstances should they be considered for release for housing that has been proven as NOT required. <p>Should these plans be approved then my family and I will have to consider migrating from the Wirral area, this is the consensus of others that have been consulted.</p> <p>This is a once in a lifetime decision that if allowed to go ahead will destroy the borough of Wirral for our future generations.</p> <p>PLEASE REJECT THE PLANS AND DO NOT LET THE GREEN BELT LAND GRAB HAPPEN</p>
DOR00921	<p>My objection to proposals being considered under the heading - Proposed Green Belt Site under the site reference SP050.</p> <p>It has been reported in the press & media that the Government has overestimated the number of houses needed, surely brownfield & urban sites would be sufficient.</p> <p>Why has the Peel Group been given planning permission without conditions being made that building should start within a time limit ? If the Peel Group fulfilled the obligation to build houses there would be no need to encroach upon the Green Belt. Is it not possible to rescind planning permission ? My family have lived in 2 Mill Hey, New Chester Road, Eastham since 1st July 1979. In the early 1980s Mill Estates who owned the Coach House & adjoining land, applied for planning permission to build a detached house on the adjoining land. I attended the Planning Meeting, the application was refused, the main objector was the Ministry of Transport who did not want extra traffic exiting on to the A41. After the afternoon consultation at Hulme Hall I spoke to a Council Official who confirmed the proposal to build 400 houses on site SP050. I told him of the previous application & pointed out that the volume of traffic was much more now than in the 1980s. Most households have at least one car, it could mean an extra 400 cars on the New Chester Road. I told him that it is difficult to make a right turn from the driveway, I usually have to turn left then do a U turn at the short strip of dual carriageway by Eastham Village Road. The Council Official replied that it would be up to the Highways Department to sort out the road traffic, he did suggest that there could be another roundabout !</p> <p>Recent research has shown that pollution from cars can hinder development in children, especially the under-fives & also can be a factor in early dementia. Site reference is bordered by the M53 and the A41, both sources of pollution. Can the sewer & drainage pipes cope with an extra 400 households ? When there is heavy rainfall the exit from Starbucks & Travelodge is flooded.</p>

DOR REF	RESPONSE
DOR00922	<p>The proposal of the new golf complex an absolute joke, you all are aware of the decline of people playing golf on the Wirral. Do I need to point out that Eastham Golf Club is about to close because of lack of support. It is an insult to the people of Wirral that you are all allegedly supposed to support Wirral and its residents in keeping Wirral a safe place from all the land grabbers and financial moguls of this world who just want to line their pockets at the expense of destroying people's lives along with their families.</p> <p>I myself and my family and my parents have lived and resided on Wirral for 100 years as have many other families and found it to be the finest place in the UK to live. And now we find that because there are people with money realising that this is the best place in the UK to live.</p> <p>Not only wanting something that nobody wants you are also looking to allow our green belt to be destroyed by people who have not got any shame in the way they conduct their methods to achieve what is most dear to them that is just pure GREED and PROFIT from destroying other people's dreams of living in the green open spaces of the Wirral.</p> <p>I would like to register my disgust and my disapproval for and behalf of all my family of any thoughts that you all agreeing to any plans to literally destroy the Wirral.</p> <p>All the facts and figures and all reports made suggest that it is not feasible what you are even considering. I have not seen or read anything that supports the ideas suggested. The services such as dentists ,doctors , shops and schools do not have the facilities to cope with any more as they are all heavily oversubscribed.</p> <p>I would appreciate a reply from you all that you have read and understood my families thoughts of the consequences that would catastrophic to the people of Wirral</p> <p>We Oppose the plans to build new houses on greenbelt land in Greasby My wife and I have been residents in Greasby for over thirty years we live at the top of Rigby Drive near to the three schools, in that time the volume of traffic has increased dramatically we find it extremely dangerous with the amount vehicles parking in the road also on the pavements. The access to our home at times is impossible our entrance is blocked by the traffic on a regular basis. The Police are always being called and we complain to the school on a regular basis who send letters out to the parents warning them of the dangers. We only have one Doctors Surgery which is difficult enough to get an appointment at and we will only have one Fire Station in the area when its finished and the others are closed. Should the approval of allowing the building of over 500 homes in the area of Rigby Drive be approved this would increase the dangers to people living in the area. The schools are full and the access to the said proposed area is already heavily congested. The site as you know is steeped in history it is a conservation area with the Greasby Copse and the Roman Road being listed listed in the doomsday book , the infrastructure of the area is just not viable to accommodate the proposal of releasing the green belt land. If you take the figures of the expert's statistics from Wirral Borough Councils Compendium of Statistics 2017 the projected population which as you know is produced annually by the WBC you can see that what is proposed is an actual fall in the population of Wirral up until 2030. These figures do not warrant the quantity of houses to be built. Therefore I would like for you to register our concerns that we oppose the plans to build on greenbelt land in Greasby also any area of Wirral as it would appear that is for greed of the developers and the councils way of generating more income and not for the need of the Wirral people to stay with as much green belt land. Think and Respect the Wishes of the Children and the Resident People of Wirral and not the Profit of the Developers who don't care and have no thoughts of anybody but themselves and lining their pockets. I would like if possible acknowledgement that you have received this complaint and reconsider any thoughts you have of selling of the land adjacent to Rigby Drive to developers to who can only ruin perfectly good greenbelt land.</p>
DOR00923	<p>Object to Wirral Council's Local Plan (2018) for the following reasons.</p> <p>1) Wirral's housing and employment needs were estimated and dictated by Central Government. However, in its Local Plan, Wirral Council does not consider sufficiently the adverse effects of proposing to build on Green Belt land, nor does it pursue all avenues of using Brownfield sites, foremost at Wirral Waters.</p> <p>In fact, the housing needs were scaled down recently, to almost half the original figures, as Wirral's demographic and economic trends had previously been overestimated.</p> <p>In addition, the owner of Wirral Waters (Peel Port) has now shown willingness to release some land for houses.</p> <p>2) I therefore urge the Council to remove all proposed building land allocated from the Green Belt and to re-affirm the original objectives behind the creation of Green Belt areas - to protect and safeguard countryside areas between settlements.</p> <p>3) Wirral being a peninsula, surrounded by open water on three sides, there is limited scope for growth in terms of more employment and housing space.</p> <p>The densely populated eastern side of Wirral along the Mersey needs open areas. These are provided by the central belt and the western pockets of Green Belt. These open stretches of land, including the corridor east of the M53, allow for informal recreation, on the quite generous provision of footpaths and in country parks. They must be retained in their integrity.</p> <p>4) Much of the Green Belt is high-quality farm land, has high landscape value and contributes to biodiversity.</p> <p>We cannot afford to sacrifice productive farm land when more, not less food is needed and as much as possible should be produced locally. It must be recognised that once agricultural land has gone, it is lost for good. Although "Green Belt" is not a nature conservation designation, by being open land it helps to retain areas rich in wildlife, whether it covers farm land, woodland, meadows, hedges, heathland or water bodies. Trying to retain or recreate comparable biodiverse habitats in housing or commercial developments is difficult, costly, often impossible. So keep Wirral's Green Belt as well as the wildlife-rich areas outside its boundaries!</p> <p>5) Allowing building in 'pretty' Green Belt areas would probably mainly attract high-cost housing and commercial developments, and not help provide low-cost, easily affordable homes and work places. In-fills in built-up areas and especially at Wirral Waters should provide such housing as well as employment buildings in sufficient numbers - sparing the Green Belt.</p> <p>6) Wherever buildings are erected, the effects of the associated infrastructure must be considered and displayed on maps, showing the necessary land allocation for roads, water, electricity, gas supply; if it is not, then the real loss of Green Belt land would be even greater than that allowed and displayed in the Local Plan. This is a further reason not to allow building on Green Belt land in the</p>

DOR REF	RESPONSE
	<p>first place.</p> <p>7) As for the pockets of land proposed for development inside the built-up areas, care must be taken that some green spaces are retained as 'breathing places', available for short walks and formal or informal play grounds for children.</p> <p>8) In connection with the Green Belt issues arising from the Local Plan proposal, I am very concerned that the Hoylake Golf Resort proposal to build 160 or more luxury houses and apartments on Green Belt does not feature in the Local Plan consultation! What is the reason for this? In the context of the objections given above, I do not accept at all that houses should be built in that Green Belt area (nor that a further Golf Course, let alone Resort is needed in Wirral).</p>
DOR00924	<p>SP050 West of Rivacre Road (Delivery report, May 2017 & proposed site access also submitted)</p> <p>Supports the proposed allocation of site SP050 (West of Rivacre Road, Eastham) ('the Proposed Allocation') for up to 960 new homes in the emerging Local Plan and it makes the case that new housing can be delivered within the first two years of the Local Plan and that it can be delivered in full within 12 years.</p> <p>Previous representations</p> <p>Previous representations to the Development Options Review to support the allocation by a Deliverability Report (May 2017), which remains up to date and is attached (appendix A). This report sets out that the site has limited potential constraints and can be delivered early in the plan period. The following should be reiterated:</p> <ol style="list-style-type: none"> 1. site is in flood zone 1, 2. small part (David's Rough) is a Core Biodiversity Area - masterplan retains this area (with a significant buffer zone) development has the potential to enhance biodiversity (170, NPPF); 3. site is not within a Core Count Area for the Wetland Bird Survey, 4. none of the Site is grade 1 agricultural land - in the interests of regional planning our view is that agricultural land classification should not be a significant consideration in Wirral, 5. we will be preparing a landscape and visual impact assessment as part of a planning application in 2019, 6. to the best of our knowledge, there are no public rights of way on the Site, although the development offers the potential to improve public access; and 7. the site is located within walking distance to Eastham Rake and Hooton train stations and is off the A41, which is well served by buses (every 15mins). Main access is from the A41 in close proximity to junction 5 of the M53. The proposed site access has been tested on the basis of the 960 new homes proposed in this submission and the potential allocation of other sites in and around Eastham (sites SP048 to SP055 inclusive (but excluding SP051). Our transport advisors have confirmed that the proposed four arm signal junction (shown in appendix B) could accommodate additional traffic generated from these sites. <p>Agreement with the landowner that requires a planning application for housing development on the Site be submitted for determination in early 2020. Planning permission could be granted in mid-2020, which is clear evidence that housing completions can begin on site within two years.</p> <p>From the list of proposed Green Belt sites, we note that there is sufficient land to accommodate this shortfall, however, in our view, some of the proposed sites should not have been included as potential sites as they should have been classified as being absolutely constrained, for example, but not limited to: Parcel SP016 (West of Meols Drive, Hoylake), which is the Royal Liverpool Golf Course; Parcel SP054 (North of St David's Road, Eastham), which is an existing country park; and Parcel SP108 (Land at Wallasey Loop), which is a motorway slip road.</p> <p>Many of the proposed sites for release from the Green Belt have indefensible long term Green Belt boundaries, for example, some of the proposed sites to be released from the Green Belt have boundaries adjacent to the open countryside with no physical features that are readily recognisable and likely to be permanent (139, NPPF). Examples of this include Parcels SP010A (East of Rigby Drive, Greasby), SP019B (West of Glenwood Drive, Irby) and SP064E (North of Whitehouse Lane). Generally, the proposed sites to be released from the Green Belt to the east of the M53 have stronger long term defensible Green Belt boundaries, notably the M53, than those sites to the west of the M53, many of which are adjacent to areas of open countryside with no physical features that are readily recognisable and likely to be permanent.</p> <p>We estimate that from the list of Green Belt sites, taking account for adjustments on sites with absolute constraints (including parts of sites), defensible long term Green Belt boundaries (A roads, motorways, railway lines and urban areas) and within a 20-30mins easy walk to a train station (2km), there is sufficient land to accommodate up to 5,896 new homes. The Green Belt sites that fulfil all these criteria are: SP039, SP040, SP042, SP043, SP044, SP045, SP046, SP048, SP049, SP050, SP052, SP053, SP054, SP055 and SP071. We believe that the sites should be released from the Green Belt and allocated for new housing as they represent the most sustainable options for future development. The total estimated housing capacity of these sites is 5,896 new homes and Wirral's shortfall is up to 5,894 new homes to be found on Green Belt sites, which will provide a sufficient supply and mix of sites (67, NPPF).</p> <p>The need to promote sustainable patterns of development should be taken into account (138, NPPF). We have demonstrated that there is sufficient Green Belt land to accommodate Wirral's housing requirement within walking distance of an existing train station, by which we mean within 2km (about 20mins). Train stations to the east of the M53 are better served than train stations to the west of the M53 and, generally, bus services along the A41 are faster and more frequent. First consideration should be given to release Green Belt land for development to the east of the M53.</p>

DOR REF	RESPONSE
DOR00925	<p>SP013 COLUMN ROAD, WEST KIRBY (Promotion document with plans provided)</p> <p>Initial Green Belt Review Revised Methodology - We agree with the identification of Settlement Areas and we agree with the division of the borough into the identified Green Belt Parcels. Although we appreciate the reasoning behind showing Flood Zone 3 within the accompanying documents, Flood Zone 2 should also be included to help inform the Council's forthcoming Sequential Test. Further borough-wide assessment of agricultural land quality is required. Using 'high-level' data, as shown in Appendix 7, will not be sound scientific evidence. The Council should bear in mind whilst preparing its Local Plan that agricultural land quality is primarily an economic consideration, not environmental. Provision of bus services along the A540 Column Road means that this corridor should also be included as an area of highest accessibility – particularly given its existing cycleway.</p> <p>Initial Green Belt Review Background Report - Agree that SP013 is highly enclosed and pleased to see this land is identified for further investigation. Dispute the tone of paragraph 5.3 insofar as the motorway and the railway line are not 'stronger' Green Belt boundaries than lesser roads or other built form. Column Road and Caldby Road provide very strong boundaries to SP013 that are clearly defensible, without extending West Kirby beyond its existing extent.</p> <p>Sites for Further Investigation - The sites identified for further investigation include very few unconstrained sites that have limited conflict with the purposes of the Green Belt, one of which is SP013.</p> <p>Many of the sites identified possess constraints that limit their potential development in a sustainable or sound manner:</p> <p>Flood Risk</p> <ul style="list-style-type: none"> • SP001 is trisected by Flood Zone 3 and Flood Zone 2 • SP004A incorporates land in Flood Zone 3 and Flood Zone 2 • SP042 includes land in Flood Zone 3 • SP043 includes land in Flood Zone 3 • SP044 include land in Flood Zone 3 • SP045 is bisected by Flood Zone 3 • The majority of SP048 is in Flood Zones 2 and 3 • SP060 is bisected by Flood Zone 3. • SP108 is primarily highway. The eastern section (beyond the highway) is predominantly in Flood Zone 2. <p>Conflict with the Purposes of the Green Belt</p> <p>We agree that Saughall Massie is detached from the main settlement areas, and therefore have concerns that any development on its edge would lead to coalescence with different parts of Settlement Area 5 and have great conflict with the purposes of the Green Belt. Several other sites would, if developed, encroach into the countryside and / or contribute towards urban coalescence. Some sites even include heritage assets that could be detrimentally affected by development.</p> <ul style="list-style-type: none"> • SP019B would extend the built form of Irby and Thingwall to the north and east • SP030 is unbound by urban form along its southern boundary • SP031 and SP033 are detached from any main settlement • SP037 is detached from any main settlement and would be an incongruous illogical development • SP041 is detached from a main settlement and would extend the urban area • SP044 includes heritage assets associated with Poulton Hall • SP049 and SP050 are not enclosed and would result in encroachment beyond the existing built-up area • SP054 would involve the development of playing fields; the site envelopes heritage assets • SP059 would potentially impact the setting of a Scheduled Ancient Monument • SP060 would lead to the coalescence of Irby, Pensby and Thingwall <p>Boundaries and Spatial Pattern</p> <ul style="list-style-type: none"> • SP010A's boundaries do not follow a road or railway and development of this site would inevitably lead to pressure for extending development further to meet a logical physical boundary • SP019B would not be bordered by logical, defensible boundaries • SP030 is unbound by urban form along its southern boundary • SP035 and SP036 are incongruous extensions beyond the logical defensible boundary provided by Mount Road • SP064E would extend the settlement to the north, without any defensible boundary <p style="text-align: right;">• SP051</p>

DOR REF	RESPONSE
	<p>Biodiversity and Landscape</p> <p>The development of SP016 will impinge on the undeveloped coast and will result in the loss of a world-famous, historic golf course. It is identified as a Core Biodiversity site (in the evidence base) and is adjacent to Ramsar site, SAC and SPA. It contains priority habitats.</p> <p>Other sites are constrained by the natural environment, including:</p> <ul style="list-style-type: none"> • SP042 includes a SSSI • SP043 contains a SSSI and a Local Nature Reserve • SP044 includes a SSSI • The majority of SP045 is densely wooded • SP047 is densely wooded • SP048 is densely wooded • SP055 is adjacent to a SSSI <p>Other Constraints</p> <ul style="list-style-type: none"> • SP061 includes a covered reservoir • SP108 is primarily highway • SP054 would involve the development of playing fields <p>Conclusion</p> <p>We acknowledge and appreciate the need for the Council to undertake a Green Belt Review. At this stage in the plan process, it is essential to undertake a comprehensive assessment of land's constraints and its function as Green Belt.</p>
DOR00926	<p>Writing to you regarding the proposed infilling within Thornton Hough and express my total opposition to any development. The proposed infill is directly on the border of the conservation area of Thornton Hough. Whilst the proposed development is not IN the conservation area boundary further development will drastically change the aspect of Thornton Hough. The village is a jewel in the heart of the Wirral and steeped in the history of area with its development down to one of the major industrialists of the age.</p> <p>It is vexing in the extreme that the expansion into the green belt is due to the unavailability of the largest brownfield site in the area that is the Wirral waters site. If the government can pressure the council into destroying the green belt in the Wirral surely they can put pressure on Peel to develop Wirral waters. There is no reason why it is not being developed other than Mr Whittaker waiting for the value of the land to go up.</p> <p>I therefore do object to all unnecessary expansion into the green belt that will totally and utterly ruin the Wirral and turn it into one big housing estate, when there is so much brownfield land available on the Wirral. Surely with Brexit looming we should not be destroying farmland we will need all the agricultural land that is available.</p>
DOR00927	<p>1. The Wirral Local Plan - Have Your Say! Booklet states on page 4 "Our Local Plan will help us deal with issues like these: Building the homes and businesses our growing population needs".</p> <p>The phrase "our growing population" is misleading since:</p> <ul style="list-style-type: none"> - From 1981 - 2015 the only growth that has occurred has been from 2001 – 2014 when a small increase from ca. 315,000 to 320,900 occurred i.e. an increase of only ca. 6000 over 13 years [1,2] - From 2014 - 2015 the population remained steady at ca. 320,900 [2] - From 1981 - 2015 the population fell from ca. 340,500 to 321,000 (decrease of ca. 9.4%) [1,2] - From 1991 - 2015 the population fell from ca. 334,300 to 321,000 (decrease of ca. 9.6%) [1,2] <p>Even taking the period 2001 – 2014 (when the population increased slightly) as a guide, this only represents a growth rate of 0.144% pa. Even if this rate continued every year until 2035 the population would still only reach ca. 330,300 by that year. In fact, The Wirral Compendium of Statistics 2018 projects that Wirral's population in 2038 will be 328,300 i.e. an increase of only ca. 7300 over the current population [3, page 14].</p> <p>Based on this population data, I cannot understand how building 12,000 new homes can be justified. There certainly doesn't appear to be any justification for building new homes on Green Belt land. Hence, how did the Government arrive at the figure of 12,000 new homes? What justification or analysis has the Government provided to justify this figure?</p> <p>I note that the Peel Group Wirral Waters project is intended to provide up to 13,000 new homes. Has this been taken into account when arriving at a figure of 12,000 new homes including 7000 on Green Belt land? Even without the Wirral Waters development, there appears to be no justification for so many new homes, but if Wirral Waters is included then building on Green Belt land makes absolutely no sense.</p> <p>2. The Wirral Local Plan – Have Your Say! Leaflet states on page 6 "An approach would be to be build on [Green Belt] land that is least good at doing the 5 things above", these five things being listed as:</p> <ol style="list-style-type: none"> 1. Stop large built areas from growing in an uncontrolled way

DOR REF	RESPONSE
	<p>2. Stop neighbouring towns merging into one another</p> <p>3. Protect the countryside from being spoiled</p> <p>4. Preserve the setting and special character of historic towns</p> <p>5. Help to bring life to urban areas, by encouraging developers to reuse derelict and other land</p> <p>This “least good” argument is nonsensical. Green Belt land by definition is already fulfilling the stated functions. The only way it will cease to be effective at doing so (i.e. become “least good”) is if the Council / Government allow it to become ineffective by building houses on it.</p> <p>3. The Wirral Local Plan Feedback Form states:</p> <ul style="list-style-type: none"> - “The Government has told Wirral to provide more homes” - “The Government... have instructed us to consult residents on releasing Green Belt land. If we don’t, they will do it for us” - “We understand this may be unpopular but we have no choice” <p>I believe that most residents are opposed to building on Green Belt land (certainly most residents in those areas that would be most directly affected). The last statement listed above from the Feedback Form comes close to acknowledging this (falling short of stating “will” rather than “may”). This begs the question – if most residents are opposed to building on Green Belt land but the Council has no choice but to build on such land (because it will be told to do so by the Government), then what is the point of the consultation exercise? Stating “we have no choice” appears to be tantamount to an admission that the consultation exercise is a sham.</p> <p>Finally, I would point out that Wirral Council is supposed to represent, respond to and serve local residents and not dictate to them what is to be done in their communities. I suggest that the Council stands up to the Government on behalf of local people instead of meekly acquiescing to Government pressure. We hear much talk from national politicians and local councillors about the importance of listening to the public and of local people being able to influence local issues. I would like to believe that on this important issue Wirral Council will demonstrate to Wirral residents that such talk is more than just empty words.</p>
DOR00928	<p>There is a compelling need to release Green Belt land for development, without which it will not be possible to meet the needs of the local population and the economy.</p> <p>Land to the north of Broad Lane, south west of Heswall (site plan enclosed) is an infill site, which is surrounded by built development on all four sides. Proposes the development of a specialist care facility for the elderly (Use Class C2), thereby addressing an identified need by catering for a specific and growing section of the community. Consider that the site represents an excellent opportunity to make a valuable contribution towards meeting unmet specialist housing needs, and that this represents an ‘exceptional circumstance’ which justifies an alteration of the Green Belt boundary. National and Local Policy requirements are summarised.</p> <p>Observations on the Methodology - Endorse the Council's approach of assessing smaller areas of land, assessing greenfield Green Belt sites against only the five NPPF ‘purposes’ invariably makes it difficult to distinguish between the credentials of candidate sites. Agree with the Council’s view only the first two appear to allow for an objective and robustly measurable differentiation between individual site. Firmly believe that decisions on which sites are best placed to meet identified needs should be informed by a broader range of factors, including the need to promote sustainable patterns of development</p> <p>Assessment Against the Green Belt Purposes - Council’s ‘Initial Containment Analysis’ records that the 22 per cent of SHLAA Site 943 is adjacent to the urban area. Very surprised by this analysis, because client’s site comprises a well-contained, infill parcel of land which is highly enclosed by existing built development on all four sites. Site is clearly an infill site, and therefore serves no function in preventing the unrestricted sprawl. Council has acknowledged that over three-quarters of the non-urban boundary is “comprised of strong and durable features that are already intact, well-developed and prominent in the landscape”. Site is very well situated in relation to the existing settlement and we believe that the low ‘urban enclosure’ score assigned to our client's site does not provide a true representation of the site’s excellent locational sustainability. A specialist residential scheme will not represent urban sprawl. We believe that the site does form part of the existing settlement area and the Green Belt boundaries in this area of Heswall should be amended to reflect the existing development in this area. We fully endorse the Council’s acknowledgement that there is potential for infill development at the site. Potential ecological considerations are not sufficiently understood at present for the site to be taken out of consideration at this stage, they could potentially be resolved through developer contributions. We agree with the Council that only Green Purposes 1 and 2 allow for an objective and robustly measurable differentiation between individual sites, insofar as the five Green Belt purposes are concerned. Site comprises a well-contained, infill parcel of land which is highly enclosed by existing built development on all four sites. We are therefore surprised that the council’s assessment records that only 22 per cent of the site is adjacent to the urban area. Notwithstanding this, we are pleased that the Council has concluded that the boundary strength is ‘strong’ and therefore it is acknowledged that the site benefits from existing durable and permanent features. It is therefore clear that a residential scheme at our client's site at Broad Lane will not represent urban sprawl.</p> <p>Rather than focusing only on the first two Green Belt purposes – noting again that the other three purposes are neutral – we believe that the Council should afford much greater weight to the merits of candidate SHLAA sites in its deliberations. Paragraph 138 of the NPPF advises that identified needs should be met in sustainable locations. The NPPF does not advise that decisions in which sites to release should be largely informed by measuring the proportion of a site’s perimeter that is coincident with existing settlement boundary. Accordingly, when assessed against the Green Belt purposes, there is no objective evidence for resisting the proposed release of our client's site at Broad Lane.</p>

DOR REF	RESPONSE
DOR00929	<p>Object to your plans for Wirral West and South on the following grounds:</p> <p>1_ it will permanently destroy a high percentage of green belt, previously under legal protection,</p> <p>2_ the demand case has not been made,</p> <p>3_ any houses built are very unlikely to be affordable by any but the affluent,</p> <p>4_ there will be years of local disruption, noise and pollution, both air and ground,</p> <p>5_ the private sector will expect the Council to provide essential infrastructure and services to residents that it cannot afford,</p> <p>6_ developers will sit on land for years having made grandiose plans, just as Peel Holdings are doing now,</p> <p>7_ the aesthetic heritage will be rendered ugly,</p> <p>8_ the quality of life of existing residents will be significantly reduced,</p> <p>9_ the semi-rural environment is what many residents came for and may leave without.</p>
DOR00930	[SAME AS DOR01052]
DOR00931	<p>Objection to the development of GB Land parcel SP013 (land adjacent to column road up to Stapledon Woods) should not be developed This land parcel has been included by landowners and developers as part of the SHLAA and is clearly a speculative/exploitative application and is not going to significantly satisfy the need for affordable sustainable homes. We believe the suitability assessment by the council should have rated this land as category 4 not 3 This land fulfils the stated purposes of retained inclusion in the Greenbelt which still apply under the NPPF(National planning policy framework) We comment on supporting these purposes as below:-</p> <p>Prevention of urban sprawl - This land prevents urban sprawl along the east side of settlement 6 maintaining openness between Stapledon Woods and the wooded corridor alongside Column Road and between West Kirby/Newton and the Caldys conservation zone.</p> <p>We do not rate this land as 'highly enclosed' due to the extent of the boundaries of woodland and field boundaries which will not be part of the proposed development.</p> <p>Merging of towns - The development of this land will have an unfavourable impact on the openness between existing settlements by bridging and merging open land between Frankby, Caldys and West Kirby/Newton.</p> <p>Encroachment - Development of this GB land would create discordant disruption to existing farming and animal husbandry still practised here.</p> <p>Preservation of special character - It remains important to preserve and enhance designated conservation areas. the building and development of this land adjacent to East Farm and the boundaries of the existing conservation area of Caldys would have a highly negative impact on its unique character.</p> <p>Assist in urban regeneration - Releasing GB land detracts from focussing on much needed development in existing and deprived urban areas.</p> <p>Agricultural Land - NPPF requires the saving of versatile agricultural land. the existing fields under the lee of Stapledon woods are currently productive and used for growing wheat and other crops and some organic farming is now being carried out in the lower fields. Looking long term the preservation and maintenance of valuable land should be supported for future generations to mitigate against the adverse impact of climate change and future food shortages.</p> <p>Landscape Character - The GB land protects and enhances valued landscapes. many people pass through the SP013 GB area be they visitors, local walkers, dog owners using Stapledon Woods appreciate how special and valued this landscape is to the community and the need for it to maintained.</p> <p>Physical/Policy Constraints - The substantial extra traffic from this land if developed and exiting anywhere between Caldys roundabout and Newton Cross Lane would cause disruption, delays, and make for higher risks of serious accidents. Especially since there is a busy secondary school within 1/4 mile of access to the proposed housing development. Such a development would have a negative impact on the rich variety of local indigenous wildlife especially woodland birds, bats and pond related fauna.</p> <p>Recent ONS figures would suggest that the projected housing requirement has been overstated and that with the cooperation of developers like Peel Holdings and other developers the housing needs could be met on existing brown field sites and areas of regeneration.</p>

DOR REF	RESPONSE
DOR00932	<p>OBJECTION</p> <p>Lowfields is a small area of woodland situated opposite Eastham Rake railway station. The most common trees here are oak, hazel, ash, beech, birch, sycamore and willow. The site is bounded by Eastham Rake road, the Merseyrail Wirral line, the M53 motorway, and the Mill Park residential estate. The river Dibbin flows through the entire length of the site, and is subject to periodic high flows and flooding. The terrain is uneven, with steep slopes and embankments up to the railway, motorway and residential areas. An electricity pylon with overhead power lines is situated within the site, and a main sewer underground. Historic waste landfill operations have also taken place in close proximity to the area.</p> <p>Botanical surveys carried out at the site in recent years have recorded in excess of 100 species, several of which are regarded as indicators of ancient woodland, including bluebells. Parts of the woodland have also been managed as hazel coppice.</p> <p>Lowfields supports a diverse range of woodland invertebrate and vertebrate species. The Dibbin has freshwater shrimps, mayflies and sticklebacks. A number of seasonal ponds also contribute to the ecological diversity of the site.</p> <p>The site also provides landscape value, particularly when viewed from the elevated M53.</p> <p>The site is mostly in the ownership of Wirral Borough Council (WBC), although part of it is in private ownership. We do not hold detailed records of the history or management of the site, but in recent times it has been managed by WBC, with occasional support from other bodies, e.g. the Mersey Basin Trust. The site is designated by WBC as a Site of Biological Importance (see later).</p> <p>The Friends of Lowfields Wood in 2016, Cheshire Wildlife Trust (CWT) agreed with WBC to establish a volunteer group to take on the management of the site in order to promote its conservation and accessibility for the local community. A variable number of volunteers have now been working regularly at the site for some two years. Progress has been good, and work carried out so far includes: repairs and improvements to the three wooden bridges over the Dibbin; provision, improvement and maintenance of steps and footpaths; coppicing and thinning of trees to open up the canopy and promote new growth, and control of invasive species such as Himalayan Balsam.</p> <p>The group has been successful in securing some funding to support this work. There is still much to do, and it is proposed to establish a more formal Friends group to facilitate this, and to raise further funding. The Friends are currently compiling a long term management plan for the woodland.</p> <p>This site is an enormously important ‘oasis’ for wildlife and biodiversity in an already highly developed area, as well as being part of a wider network of other sites around Wirral and Cheshire. It also has great potential as a resource for local residents and the wider community.</p> <p>Site of Biological Importance Lowfields is designated by WBC as a Site of Biological Importance (SBI), and as such is protected through the Unitary Development Plan (UDP) process under UDP Policy NC5: The Protection of Sites of Local Importance for Nature Conservation Policy. In particular: ‘...the Local Planning Authority will protect habitats of special local importance for nature conservation where they represent a scarce, rare or threatened habitat, good examples of habitats typical to Wirral, diverse or rich habitats which actively support a wide range of important species, or areas known to provide for the shelter, breeding or foraging of legally protected species.’</p> <p>‘Development affecting such habitats will only be permitted where the Local Planning Authority is satisfied that the continued ecological viability of the habitat or wildlife interest of the site can be adequately safeguarded by means of appropriate conditions and/or legal agreements.’</p> <p>‘Policy NC5 will normally require such sites to be preserved undamaged within the layout and design of development proposals.’</p> <p>National Planning Policy Framework (NPPF)</p> <p>We also refer to the recently updated NPPF (July 2018), which states that: ‘Planning policies and decisions should contribute to and enhance the natural and local environment by...protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan).’</p> <p>Supplementary note on the consultation process</p> <p>Whilst this document was in preparation, it was brought to our attention that our fears regarding Lowfields may be allayed to some extent by the fact that this ‘strategic parcel’ is in fact currently ‘zero rated’ for potential housing development. We believe that this should have been made more apparent in the consultation documentation.</p> <p>Notwithstanding this, our objection to the possible removal of this site from the Green Belt still stands.</p> <p>Conclusion</p> <p>For reasons set out above, the Friends of Lowfields Wood strongly object to the removal of this site (SPO48) from the Green Belt. We are particularly concerned at the possible loss of protection for an important Local Wildlife Site.</p>
DOR00933	<p>Strongly object to the following green belt areas being explored for housing developments: SP030 - SP036 (inclusive of), these proposals will negatively impact on the physical environment, the wildlife, the traffic and in turn affect the mental and physical health of residents living in the area. We need to protect our green belt areas as these are what makes Wirral, Wirral the leisure peninsular. Wirral prides itself on having a great balance between housing, business and countryside. There are many brown belt areas in desperate need of regeneration, these are the areas the local plan should focus on.</p>

DOR REF	RESPONSE
DOR00934	<p>Our objection to the proposed disposal of green-belt land for building 12000 houses over the next 15 years for the following reasons:</p> <ol style="list-style-type: none"> 1. There are sufficient Brownfield sites on the Wirral to build this number of houses plus. (The number of houses predicted to be needed by WBC is suspect considering the evidence raised by an independent report produced by [another respondent]). 2. WBC needs to have carried out by independent personnel an inquiry to determine the actual number of houses required and the result of that inquiry used to build houses on existing Brownfield sites and not Greenfield sites. 3. For WBC to say that CPO's for Brownfield sites are too costly or take too long to implement is a poor argument. It takes approx. 18 months to implement CPO's and apparently Wirral Waters has "Housing Zone Status" which makes it eligible for government grants to remediate and develop already vacant land. 4. Green Belt land is more attractive to developers and would be more profitable for them to build on. Therefore any houses built on Green land would mean fewer affordable houses being built. 5. There are more than 2,000 - 6000 empty properties available on Wirral which could be used initially for housing needs without having to commence building new properties. 6. The release of Green-belt land WBC proposes could support over 70000 houses when in fact we only need (according to WBC figures) 12000 houses. This is a scandalous means of raising revenue. 7. WBC need to conserve as much open space as possible for the people of Wirral and its future generations to enjoy. Once green spaces are built on its gone forever. What about the Brownfield sites? If Green sites are used the Brown sites will be left to become an eyesore and a blight to the residents of Wirral.
DOR00935	<p>Residents within Raby have chosen to live there because of its close proximity to the Green Belt. They have, therefore, paid a premium for that privilege when buying their property. Re-classification of the Green Belt and permitting its development with large estates (I have been led to believe that the intention is to increase the number of homes in Raby by 2,500, thus quadrupling its current size) would not only be detrimental to the natural beauty of Raby, the Mere and its surroundings but would reduce the attractiveness of the residential area. Consequently, residents would see a devaluation of their property. This could affect the revenues raised by the Local Authority when it comes to Council Tax charges. We would certainly request a review should the proposal be approved.</p> <p>Secondly. The current highway struggles at present to cope with the volume & size of traffic which consists of buses, large lorries and various smaller vehicles. Throughout the day our road is used by those living in Bromborough as a short cut to and from the motorway and by people who reside on the east/north east side of the Wirral who wish to avoid the Clatterbridge Roundabout on their journeys elsewhere. This is especially so at peak travel times. Their driving, at times, is impatient, too fast & irresponsible. I have experience of this first hand as my vehicle has been damaged on four separate occasions whilst parked on the road.</p> <p>Thirdly. The future occupiers of these new estates will require schools, shops and medical services. As these are of limited availability within walking distance, anyone new to the area will have to use motor transport (as most residents do now) to get to them. They may even have to look further afield. Further increases in road traffic would be inevitable. To expect Blakeley Road, in its current form, to cope with any future large increase in traffic would be both dangerous and foolhardy and must be considered before any change in Green Belt Status is removed. It would be logical to assume that a road widening scheme would have to be put in place from Raby Hall Road past the Mere to the junction with Thornton Common Road and, maybe, beyond. The junction with Thornton Common Road (a small bridge), which, at present, can only be navigated one vehicle at a time, would also need completely re-designing. The effect of all this on Blakeley Road and the area surrounding Raby Mere would be substantial as many of the trees currently established there would have to be removed. There would also be an impact on the health of the residents of Blakeley Road as there would be an increase in the vehicle noise & pollution levels. There would also be a problem in Raby Hall Road where at present traffic lights control a one-way system on part of that road. This would also need resolving. Whilst we understand the Local Authority are under pressure from Central Government to provide building land, the former should not encourage developers to 'cherry pick' land that suits them so that they can gain a quick profit. Nor should anyone be allowed to disregard the value of the Green Belt or the effect it can have on people's lives once removed. The Local Authority should encourage developers to purchase brown field sites. We believe that the impact on both the environment and the residential area would be disastrous. Furthermore, the cost of altering the highway infrastructure to cope with the changes could not be justified when it is considered that local councils are struggling, and will do so in future, to find money for even the most essential services. To conclude my wife and I do not agree with the proposal as we feel there must be areas on the Wirral better suited for development.</p>
DOR00936	<p>My opposition to planning proposals SHLAA 2024 and SHLAA 2025. With regard to SHLAA 2024, the library building is used throughout the week for a large number of activities for residents of the Wirral and outlying areas, including WI, ballroom dancing, bird club, keep fit for adults, keep fit for children and line dancing among others. I believe this highlights the important role the library building plays for the community, in terms of enabling people young and older to mix and socialise. Older people who might live alone regard the library and its activities as a lifeline, while children should not be expected to have to travel to a library further away. Transport links to other libraries for people who might be less mobile are limited. With this in mind, I am greatly disappointed by Wirral Council's suggestion for the library to be closed and replaced by residential properties.</p> <p>In terms of SHLAA 2025, the car park is at full capacity every day. This provides space for shoppers using Bromborough village and the employers of the businesses in the village. I would like to know what Wirral Council's proposals are for parking going forward. The village employs approximately 400 people, according to figures I am aware of. In my opinion, removing parking space in Bromborough village would seriously harm the village and the livelihoods of the people who are employed by the businesses in the village.</p> <p>I believe Wirral Council's development should focus instead on areas in Wirral South which require development such as New Ferry. There has been little effort to improve the centre of New Ferry</p>

DOR REF	RESPONSE
	following last year's gas explosion.
DOR00937	I strongly object to consideration of building on our green belt before exhaustive consideration to brownfield development is undertaken.
DOR00938	[SAME AS DOR00920]
DOR00939	<p>I object against all of the following plans</p> <p>SP054 SP053 SP052 SP055</p> <p>Eastham has lovely character and history. One of the main reasons I bought my house was because of the green spaces and treas. Housing or Industry will cause more traffic, school and doctors will become more overcrowded, Eastham has already contributed towards housing and Industry. The historic villages and green spaces should be protected</p>
DOR00940	<p>Levers causeway is part of the green belt on Wirral. It is beside the ridge line of Storedon wood which is believed to be the site of the battle of Bunnaburgh which was one of the decisive battles in the formation of England. To build on this land would be awful, there is lots of brown land available and a great deal of land was made available for building to Peel holdings who have yet build any houses, perhaps the authority should compulsorily purchase this land instead of destroying more greenbelt.</p>
DOR00941	<p>Objection to building on green belt. I feel there is no justification for Greenfield development whilst there are large urban areas that remain vacant. Also many of these Greenfield sites would attract very high prices in housing market and this does not meet the need for low cost family homes. Wirral greenbelt was put into the structure plan in the 1970's and at this point I can see no changes that would mean we should go away from this plan.</p> <p>Investment should be put into rundown areas. Maybe grants should be available for developments on sites that may need cleaning up before they can be used for housing.</p> <p>Greenfield sites that form boundaries to different communities are important, certain areas are becoming joined up, greasby. Upton etc.</p> <p>If the council is dependent on sites owned by peel holdings to meet the housing targets, what can be done to make peel holding either develop vacant land or make the land available for someone else to develop. The dockland area is an eyesore, surely there are some powers that the local authority can use to force the issue.</p> <p>If wbc does not agree with the targets set by central government they should continue to appeal against the target providing proof that it is not suitable for this area.</p> <p>The council should spend less time on convincing the public of the need for something and meeting housing targets for example Hoylake golf course development including a hotel and the developer gets to build very expensive houses on green belt land or a new sailing school on West Kirby prom along with a hotel on our carpark. These projects have left many members of the public thinking that someone is using a backdoor to development.</p> <p>I also think the council should identify empty homes on the Wirral, this information is already collected by different department for example the electoral register shows properties where there is no registered elector and the rates department should also have records of properties that are vacant.</p> <p>In summary, I am against development on the greenbelt, I think there should be some encouragement for developers developing brownfield sites and I would question the number of houses that central government state we will need in the future.</p>
DOR00942	<p>Objection to the proposed plan to build on the civic centre car park in Bromborough.</p> <p>There is simply nowhere else to park, the Coop car park is always full and shoppers would have to park in the streets which would be a congestion hazard.</p> <p>If shoppers decide it is too inconvenient it will put the whole shopping centre at risk of becoming uneconomic.</p> <p>Also I am a carer for my disabled daughter who is a wheelchair user and needs to use the disabled space in the car park.</p> <p>May I suggest a rethink ?</p> <p>Surely there are other sites which can be built on. I understand there may be a lot more land becoming available to build on .</p> <p>Also if the businesses in Bromborough close there are less business rates for WBC. It does not see to make economic sense ?</p> <p>Surely Bromborough village can be spared ?</p>

DOR REF	RESPONSE
DOR00943	<p>The parcel of land SP042 North of Poulton Hall Road should neither be released from green belt nor be developed on as it upholds the criteria intended for the purposes of green belt land.</p> <ul style="list-style-type: none"> • This land acts as separation between Settlement Area 4/Poulton/Spital and Settlement Areas 7 & 8. To release this land from green belt and re-classify the M53 as the new separation boundary (as proposed) would be precarious as the motorway is a man-made structure and could potentially be re-routed or re-defined leaving the merging of two or more settlements. • This land parcel, together with the neighbouring parcels, safeguard agriculture and countryside. Without these parcels of green belt land the boundary of Settlement Area 4 would be a motorway. There would be no countryside to the east of the M53, just built up areas and urban sprawl. • This area is part of the Clatterbrook and Dibbin Valley Landscape Character Area and the strategy is to enhance the character of the area. Destroying the wooded horizons, nature and farmland would be contrary to the guidelines. • Not allowing development on this parcel of land will encourage urban regeneration and will urge developers to recycle the brown sites in the run down areas of Wirral. • This land includes Claremont Farm, the tenants of which have built up a business which is appreciated by a large section of the public both from Wirral and beyond. The farm shop, café and social events such as The Classic Car Show and Farm Fest bring many visitors to this part of Wirral, not to mention the educational “Welly Walks”, bush craft skills and cookery classes. Claremont Farm is a financial and social asset to Wirral and should remain. • Plot SP042 is part of Liverpool City Region Ecologist Network whose ecological priority is to create new woodland to buffer ancient woodland. This land also comprises of a wetland area and deciduous woodland which is included on the Priority Habitat Inventory (England). We have spotted many species within the woodland which include foxes, bats, the red legged partridge, speckled and green woodpecker, gold finches, pheasants and lapwings in the field beyond. Even if the woodland area were to be left intact and houses were to be built around it, the process of construction would irretrievably disturb the wildlife. • The land as well as its surrounding land is potentially a site of historical note, reputedly being within close proximity of the Battle of Brunanburgh site. To develop on this land could destroy important evidence. This site should be properly investigated before any possible development commences. • Road access to and from this plot of land if developed would cause increased traffic congestion. There is no vehicle access from the site other than on Old Clatterbridge Road. Residential traffic would be forced to use this road together with the junction at the B5137. Traffic times are slow when turning east at this junction even now. However, more importantly, traffic turning right off the B5137 into Old Clatterbridge Road can currently cause tailbacks as far as the motorway slip road. Even with traffic control signals, tailbacks as far as the M53 would be inevitable with increased traffic. • In respect of Wirral as a whole, I understand that Central Government dictates the housing policy, however I think it should be the responsibility of our local council to challenge the Government with regards to their demands. Wirral, being uniquely a peninsula, doesn’t have the geographical luxury of surrounding overspill. Special consideration to the physical restrictions of the Wirral Peninsula should be taken in to account where future housing development and infrastructure are concerned. <p>Moreover, according to the List of the 326 districts of England (English Municipalities) by population, estimated figures for 2017 from the Office for National Statistics, Wirral is ranked just 30th out of 326 with a population of 322,800.</p> <p>Compared to districts of the same geographical area (using a range of ten districts with areas from 142km2 to 165km2 with Wirral being 157km2) Wirral district is ranked the second most densely populated area; second only to Bromley, a district of Greater London. To add to this, the conclusion of “Wirral SHMA and Housing Needs Study – Final Report” states that “The latest Experian forecasts indicate more optimistic levels of job growth compared with past trends, projecting growth of 7,730 over the plan period. To support this level of job growth a substantial amount of in-migration would be required, which would generate high levels of population growth (compared with the demographic-led scenarios) and housing need of 1,233 dpa (dwellings per annum)” Where is this job growth materialising from? Is it just Wirral or Liverpool and Chester too? If the latter, shouldn’t housing to accommodate this substantial amount of in-migration be assigned to Lancashire and Cheshire as well?</p> <p>The National Planning Policy Framework states that in achieving sustainable development, planning policies “should take local circumstances into account to reflect the character, needs and opportunities of each area”. In my opinion, local geographical circumstances are not being taken into account. The needs and opportunities of the area are not being considered within this plan and the level of development suggested will change the character of Wirral, turning a once jewel of a district into an over populated outskirts of two cities.</p>
DOR00944	[SAME AS DOR00455]

DOR REF	RESPONSE
DOR00945	<p>Object to the proposed plans, by Wirral Borough Council (WBC) to release 8sq miles of GREEN BELT land on which to build homes on Wirral. There is space for 18,000 houses on BROWN FIELD sites on the Wirral currently, more than enough to meet even inflated targets. The Government has stated that Wirral “is not an area of high housing pressure “ but one where over 80% of the house moves involve Wirral residents relocating within Wirral. WBC’s exaggerated ‘objectively assessed housing need’ which has led to the misconception that it cannot be met without some release of Greenbelt, stems directly from a wholly unrealistic projection of future economic & population growth & displays a staggering lack of recognition of local knowledge & historic trends. W.B.C’s figures show glaring omissions, errors & admitted failure to take into account higher densities of modern development which require a smaller land-take & can provide more homes without GREEN BELT being released for at least a generation. Development is most desperately needed in the run-down & declining parts of Birkenhead, Wallasey & New Ferry & should be ‘affordable housing’ built on the BROWNFIELD sites, NOT expensive executive homes built on Greenbelt. There are 6,000 unoccupied properties on Wirral, vast numbers of unused Planning Consents & Outline Planning Approval at Wirral Waters for dwellings to be built by Peel Holdings, all of which should be pursue by W.B.C before using our precious Greenbelt land!</p> <p>The Greenbelt is our Green Lungs which mitigates against Climate Change. Greenbelt development increases traffic & pollution & increases populations in areas without adequate infrastructure & services to cope. Our precious wildlife & woodlands will be lost forever! One proposed development local to me is the land on the north side of Thingwall Road between Limbo Lane & Arrowe Park. There are woodland copses here that are home to bats & owls, seen hunting over the fields where there are plans for building to take place. There are also newts & toads present in the ponds on the edges & in these fields. Once our Greenbelt is gone it is gone e for good!!!!!!</p> <p>W.B.C figures have now been proved wrong by new Office for National Statistics indicating a new target of 500 rather than 800 homes per year will be needed. WHAT ELSE HAVE WBC GOT WRONG?</p>
DOR00946	<p>Council’s consultation is predicated upon the understood Plan requirement of 12045 homes, and the identification of a number of sites which could contribute towards these and employment requirements. Initial assessments were reliant upon an evidence base which should have been made available for the interrogation. By consequence of these assessments being unavailable, it is not clear the extent to which the objectively assessed need will be met and also the robustness of the draft recommendation. Reserve the right to provide additional responses.</p> <p>Sites for Mixed and Commercial consultation - Only comprises three sites. There is little clarification in terms of the objectives for this allocation other than the brief phrasing.</p> <p>Site ELP094 comprises vacant land (0.47 hectares) north of Prenton Office Park - broadly supportive of the ambition to provide a more flexible allocation, However, given the proximity of the land to the south (and the clear potential which exists for this land to become inactive) then we consider that it would be appropriate to extend the allocation southwards to include the Office Park and the Total Fitness unit. we consider that it would be appropriate to extend the LSP094 allocation southwards to include the Office Park and the Total Fitness unit. This approach provides a more substantial site which increases it’s potential to deliver well-planned development to both meet objectively assessed needs but also to contribute to wider planning objectives and design standards.</p> <p>[site plan enclosed]</p>
DOR00947	<p>Releasing parcels of green belt cannot be justified, particularly in light of the most recent housing needs forecast for Wirral. Development is an important aspect of any local economy but any development needs to align with the needs of the local economy. In the case of Wirral the needs are clearly greatest on the east side, but of course this presents challenges in terms of viability. These challenges need to be addressed rather than pushed to one side in favour of releasing green belt where viability is less of a challenge. According to Government statistics Wirral Green Belt represents 46.61% of the land mass. This is comparable with other local authorities in the region, except Liverpool which only has 4.74% of designated Green Belt. What is not evident in any documents published by WBC or in the presentation given at consultation meetings is the percentage of land that is actually built on. These figures were published in November 2017 within the Corin Land Recovery Inventory. Wirral’s built on percentage is 43% and is one of the highest in England. National planning policy already allows for development on Green Belt, where a special case can be demonstrated. National planning policy also allows for development in Green Belt where gaps between existing dwellings are evident. The right decision for Wirral based on the most recent housing needs forecasts and the existing provision for limited development in Green Belt is to leave the Green Belt as it is. A good decision for WBC will be to revise its attitude to development within Green Belt to align with National Planning Policy, adopting a more pragmatic stance where it’s evident that applications fill gaps or improve sites that have been blighted by abandoned commercial activities. There are numerous modest sites of this nature sitting within Green Belt in Wirral. This approach will not materially detract from Green Belt but WBC will retain the ability to safeguard the Green Belt that is genuinely untouched by development. Retaining the current Green Belt is the right thing to do. The only way a case can be made to change it will be based on false information.</p>
DOR00948	[SAME AS DOR1052]

DOR REF	RESPONSE
DOR00949	<p>Wirral Borough council failed to deliver a local plan and failed to meet deadlines 6 times since 2004. Now they have 2 months to rush through a plan and consultations. Their plan is flawed and this site should not be built on for the following reasons:</p> <ol style="list-style-type: none"> 1. Wirral compendium of statistics for 2017 states that the predicted population increase will be less than 6000 by 2038. Therefore there is no reason why 12000 new homes are needed and WBC have not challenged the government's target of 12000 by 2035. This should be done before any release of greenbelt. 2. There are currently 4500-6000 empty houses in Wirral and other brownfield sites that with the developments at Wirral Waters would meet the actual demand. 3. Development is most needed in the rundown areas of north Wirral & new ferry. Building on this green belt land will not meet their needs. Most developments (approx. 84%) on greenbelt land are larger family or executive homes – very little is of the much needed affordable housing. 4. Building here will have a detrimental effect on the bats that live here. I have seen and counted over 35 bats fly in this field over the summer. The destruction of the pond in this field will severely affect the habitat of these bats as well as the birds that use it as an essential resource on their migrating flight pathway. 5. Building on the greenbelt will deprive Wirral of its 'Lungs@'. Green spaces are required to counteract pollution and to benefit health and well-being. This particular field is accessible to all as it contains a public footpath and so should be conserved for all to utilise. 6. The impact of the infrastructure will be enormous – traffic congestion – not enough school places at both primary schools in Irby as it is and no GP surgery in Irby. Waste water is sent to Meols which will not cope with higher demands. 7. Greenbelt land is there to check unrestricted sprawl of large built up areas. We do not want Wirral to become 1 large conurbation. To lump Irby, Thingwall and Pensby together is wrong as they are separate places with individual character. 8. This would cause disturbance to the Ancient monument at Irby Hall <p>Greenbelt land is there to safeguard the countryside from encroachment and only exceptional measures can justify building on it, and there are none. Wirral Borough Council is adopting the easy option for the financial benefit of greedy investors and developers rather than planning for the needs and wants of the Wirral people.</p>
DOR00950	<p>Concerns about your plans to build on the Wirral's green belt. I have studied the population forecast for this area up to the year 2033. According to the Wirral Intelligence Service, originally sourced from ETHPOP[1]; in 1996 the Wirral had 322,700 residents, by 2017 that number had increased to 322,800. By 2028 that number is predicted to be 326,900 representing an increase of approximately 4,000. Seeing as the population only increased by approximately one hundred in 21 years, where are these increase predictions coming from. Another data source, the Wirral Compendium of Statistics 2017[2], actually predicts a reduction in the overall population of Wirral, indicating a decrease of 6,544 individuals. With this being the case, it is perfectly clear that the actual number of houses required in this area is far less than the 12,000 stated by Government ministers and is being implemented by local council. In addition, the Wirral also has approximately 6,000 empty houses[3], which if occupied, would reduce this need even further. The proposal to merge Pensby and Irby villages with a sprawl of houses on our green belt is particularly close to my heart; 48 new properties were built a few years ago, on the Pensby Wood school playing field, opposite our house, and this has caused numerous problems with services including the disposal of waste and surface water. We have had two episodes of flooding due to the sewers not being able to cope with the additional volume going through them; also the increase in vehicular traffic in the area and associated parking problems have increased. We have lived in this area for the last forty-one years and have not had any of these issues before all the new houses were built. If they proceed to build new houses on the land between Pensby and Irby, how will all the surface water and effluent from these properties be dealt with? Peel Holdings, Wirral Waters holds over 500 acres of brown field sites in the Wirral area and have held this land for at least eight years, with a promise to build 13,000 new homes and develop this land; they have not, as of yet, built one house and have reduced the promised 13,000 properties to 2,400, which is despicable.</p> <p>We have been told they are 'land banking'; can nothing be done to make them use this land as promised, or give it up for others to develop it? We know it is this council's fault we are in this position, as they should have put forward a plan, as the government advised them to 13 years ago; which could have protected the majority of our green belt. Also the Labour council has plans to build a golf course on the green belt, which we don't need. The council have already wasted 26 million pounds of our money on plans, consultation fees, etc. for this golf course. They want to make the greenbelt available for this development and this is their way of ensuring this happens, whilst shifting the responsibility to the government for 'making them' use our green belt, when there is plenty of brown field sites not being utilised. On the Wirral there are already 13 golf courses, 3 boot golf courses and 2 pitch and putts, so the last thing we need is another golf course. The Wirral is only 15 miles by 7 miles or 60 square miles. This is a very small area, which already has problems with the amount of traffic and lots of areas flooding with surface water. Arrow Park Hospital is at full stretch and it is difficult trying to see a GP. Hundreds more people coming to the area will only put more pressure on these already stretched resources. The Wirral is only 15 miles by 7 miles or 60 square miles. This is a very small area, which already has problems with the amount of traffic and lots of areas flooding with surface water. Arrow Park Hospital is at full stretch and it is difficult trying to see a GP. Hundreds more people coming to the area will only put more pressure on these already stretched resources.</p>

DOR REF	RESPONSE
DOR00951	<p>Development should NOT occur on the land marked SP019B.</p> <p>The land behind the house where I live is rich in biodiversity with bats (it is the feeding area for those living in my neighbour's tree), birds (owls, buzzards, woodpeckers etc), migratory birds and not to mention the newts that are living in the local ponds. Building in the area would destroy the habitat and lead to a decline in the local wildlife population. The land is also productive farmland and is used every year for different crops by the farmer. Where would you propose that the farmer sows his crops if the land is taken away? It will ruin his livelihood. Where is the additional infrastructure that will be required for all these new homes? Thingwall Road is busy enough as it is - local dentist and doctors are already at capacity, as are local schools. the area would be overcrowded and would be turned from the generally quiet area to a busy and noisy town. The reason I moved to this area was to get away from dense housing and live close to the countryside for a more peaceful lifestyle.</p>
DOR00952	<p>Objection to the recent proposal for an infill village in the Green Belt at Barnston village and near to Woodlands Drive.</p> <p>My objection is both in general to the use of Green Belt for development and to the specific area at Barnston village and Woodlands Drive specifically.</p> <p>I am dismayed at the lack of proper preparation and inaccurate data being used for the proposals.</p> <p>Generally, the assumption is that the Wirral population is going to grow considerably over the next 15 years, hence the requirement for this additional housing.</p> <p>This is based on productivity growth calculations of hypothetical future industry growth and requirements, none of which can be supported in either historic or present real circumstances.</p> <p>The Wirral just does not have nor ever will have the industry levels hypothetically described.</p> <p>In fact ,history indicates this to be a flawed judgement.</p> <p>The population in the 1970's was circa 370,000 and fell over time to circa 310,000 in 2012. There has since been a slight rise to circa 315,000 in 2017 with data suggesting it is more likely to decline again rather than increase ,thus rendering the proposed housing increases via Green Belt as wholly unnecessary.</p> <p>Population levels continue to be far short of 1970 levels, any future requirements could be met via current proposed developments such as Peel Holdings and Persimmon, the redevelopment of existing Brownfield sites and the re-use of current empty housing stock.</p> <p>With regards to the land around Barnston village and near to Woodlands Drive, I object on several grounds.</p> <p>Gills Lane is wholly unsuitable to carry the additional traffic an infill village would cause being a narrow B road and it has a dangerous junction with Barnston Road.</p> <p>Barnston Road currently has high levels of traffic causing difficulty of egress for adjacent roads, especially at peak times and the creation of another village in the vicinity and the additional traffic would only exacerbate the current problems seen by many local residents.</p> <p>An infill village in this position would cause a merging of villages such as Heswall, Barnston, Pensby and Thingwall into a major urban sprawl without any delineation between them contravening one of the five principles.</p> <p>I hope you take my objections seriously and rule against the projected unnecessary development at Barnston village and near to Woodlands Drive.</p>
DOR00953	<p>Proposed developments Heswall local plan</p> <p>Response will apply to Greenbelt as a whole Riverbank Road, Seabank Road, Manners Lane North and South and Wittering Lane. This identified land is prime quality agricultural land, situated within current Green Belt Land Parcels and it is within the Core Biodiversity areas designated at appendix 5, the Map of WeBS Core Count Areas at appendix 6, the Map of High Quality Agricultural Land at appendix 7 and adjacent to the Flood Plain (save for Wittering Lane which falls within) at appendix 4. The land is also adjacent to Wirral Way, a designated site of biological importance. Wittering Lane is also designated as a site of biological importance. These are identified within Proposal NC6 of the Unitary Development Plan for Wirral. Proposal NC2 also designates the Dee Estuary Wetland of International Importance and Special Protection Area. In addition, NC4 also designates the Dee Estuary as a Site of National Importance for Nature Conservation. When the proposed review criteria is applied to this land, it is clear that the reasons why this land is designated Green Belt still apply and will continue to apply in the future. There are specific reasons why this land is currently designated Green Belt and it is important to point out that this land would not have been identified as land suitable for development, were it not for the local land owner wishing to sell prime quality agricultural land within the Green Belt for development. This was not in response to identification of a local social need and requirement for land in the specified areas, by Wirral Council; instead it is to provide the landowner and the developer the opportunity for personal gain by building and selling executive housing in an area where prices are and will remain at a premium. It is clear from the locality and current position of being land coming within the criteria outlined in paragraph 1, that Wirral Council will be unable to demonstrate exceptional circumstances required by the National Planning Policy Framework, to demonstrate the level of need required to be able to alter Green Belt boundaries. Further, any development of this area would have such a detrimental impact on the benefits of retaining the Green Belt status, when applying criteria, considering the adverse impact of development required by developers and land owners undergoing the site-specific Sustainability Appraisal, on meeting the assessed needs for new development at Appendix 8 that will be negated in full. The specified land will require more than simply a plan to re-house existing wildlife due to it being an existing wildlife corridor, essential for the preservation of protected species such as badgers, birds of prey, voles, foxes, hedgehogs, harvest mice, wading birds such as curlews and sheldrakes, amongst others, as it is within the European Bird Count protected areas. This is an area of Scientific Interest due to the extensive biodiversity of the area, required to protect the existing wildlife corridor Coastline development, if allowed, would have to comply with the criteria at Appendix 8. The area is not required to improve employment prospects, address multiple deprivations or promote accessibility of services. It will</p>

DOR REF	RESPONSE
	<p>not assist in meeting affordable housing needs in Wirral and the local area cannot sustain extensive re-development, as the local land layout and proximity to the coastline and the Wirral Way prevents it. Thus, any proposals can only be for executive style, larger properties. Such development will only serve to increase house prices by selling at a premium in a high value location. Environmental Protection and Enhancement of the area will suffer severe adverse effects should development be permitted in these areas as the Proposed Site Specific Indicator is “yes” to every question, thus excluding the land.</p> <p>The benefit will be personal to the developer and landowner and the housing created will not address the need for Wirral Council to comply with their obligations to provide more sustainable and affordable housing in areas of need. The cost to the Council of altering planning laws to allow for development in such a protected environment; both in terms of loss of wildlife and diversity and the effect on hundreds of people who access this land daily for recreational and health benefits; will far outweigh any gain other than financial gain for the landowner and developer.</p> <p>Wirral Council states at 6.14 “European Sites and Supporting Habitat that “ The Council has a legal duty to protect European Sites designated for their international importance for nature conservation. This protection extends to functionality linked land located outside the designated area that may contribute to the support of the species within them, including off-site roosting, breeding and feeding habitats for qualifying species.” As the specified land is within the designated European Site for WeBS Core Count Areas, this legal duty will extend to the specified areas which are the subject of this response and, thus, any development of the land put forward by the local landowner will be unlawful, unless the area was no longer required for nature conservation. There is no evidence that this land will no longer be required, as it is and remains an important area of special scientific interest and land required for the sustainability of the biodiverse nature of the area. This requirement far outweighs any benefit that could be gained from development of the area for housing. A further point to note is that if land is included without sufficient regard to the criteria at Appendix 8, including sufficient consideration afforded to what, if any, “exceptional circumstances” needed to allow for development, this will leave the decision to include the land open to a legal challenge via judicial review, of the decision.</p> <p>Paragraph 3.8 of the consultation at page 9 states ... “the Merseyside Structure Plan was adopted in 1980, the strongest overall emphasis has been on the promotion of urban regeneration, which, in response to previous consultation, remains the principal focus of the spatial vision and broad spatial strategy of the emerging Core Strategy Local Plan for Wirral”. It is well publicised that the development on the Wirral Waterfront known as “Wirral Waters” has not provided the numbers of housing units set out within the planning proposal. Addressing this issue should be a priority for Wirral Council. It is known that the Government has made funds available that will aid this development, so focus should be on addressing this immediately, ensuring developers deliver the numbers of units initially promised. This strategy would adequately and effectively address the obligation of Wirral Council to provide good quality, affordable and social housing for Wirral and address the requirement and need for urban regeneration in areas where social deprivation demands this. Extensive costs required to satisfy the requirements needed to change Green Belt boundaries in order to achieve a small number of high value executive style private housing, would be better directed to areas where development will provide lower cost, affordable housing and provide much needed social housing. In respect of the five purposes of including land within a Green Belt, the specified land is protected to safeguard the countryside from encroachment. Due to the location adjacent to the coastline and the extensive biodiversity of the area and benefit to all scientifically and recreationally, the requirement to safeguard this area from development far outweighs any gain to be achieved by including the sites within the Local Plan, thus allowing for development and permanent loss of the area and all the wildlife that exists. Hundreds of people access the area daily for leisure, recreational and scientific purposes and their need to continue with those activities must be considered.</p> <p>When compared with the small number of people who would benefit from being in a position to purchase high value housing within this area, permanently preventing access to the majority for the benefit of the minority, it is clear that the land should be retained as Green Belt to ensure the maximum benefit the land can offer, is retained.</p> <p>It seems little though has been given to the current infrastructure and the almighty costs of major civil engineering projects to support the Infill village in a coastal and greenbelt area, let alone the need for better transport links and the land required to support the need for bigger schools, doctors surgery’s and Sewage requirement in an area that is already at bursting point with increased traffic, congested roads and population, We Also question the seemingly loose interpretation or validity of an Infill village for greenbelt parcels of land in the lower Heswall area. We also believe these proposals are in direct conflict with National guidelines and WBC’s own UDP policies.</p> <p>The council should be concentrating on invigorating brownfield sites that would benefit the greater Wirral population with employment affordable housing and addressing equality in the more deprived areas of Wirral rather than contributing to easy targets of high value housing for the wealthy landowners and developers in such already affluent areas. The council should be concentrating its efforts on the behaviour of Peel holdings and the lack of information regarding the number of houses the propose to build, and pressure should be put on them to develop brownfield sites to create areas of affordable housing near prime areas of employment and the best transport links.</p>
DOR00954	<p>Save Eastham Green Belt - Children stay in doors to much and play on electronic devices years ago every bit of open land was a magical freedom to explore , make camps, and to see wildlife, I remembering my daughter on one of these proposed sites collecting wood lice as pets, now my grandchildren are going to lose all this rummaging into nature and learning how to care and look after our environment and now you are going to take away from me getting out to walk in my retirement, my daughter who has a small garden and takes the children out for walks, and my grandchildren who will end up living in a concrete jungle where there’s no birds, no wildlife, and the carbon dioxide in our community goes higher and puts pressure on our schools, doctors and dentist facilities, I know we have a housing shortage but there are many buildings that are empty that you could start a new small community in those areas with facilities for that community.</p>

DOR REF	RESPONSE
DOR00955	<p>The proposal to remove the car park and replace it with possibly a residential or some other form of development; in my opinion, is utterly insane. This car park is 90% to 100% full six days of the week and is used by local shoppers, visitors to Bromborough Village and business personnel. Bromborough Village centre consists of various businesses including several banks, hairdressers/barbers, a variety of shops, cafes/restaurants, social club, public houses, estate agents and solicitors, all of which are very well supported by the local community and visitors to the village. Several of these businesses are relatively new and their owners have clearly invested tens of thousands of pounds in them.</p> <p>I have no doubt whatsoever, that if this car park was removed many of the aforementioned businesses would cease to trade overnight, as people would simply stop coming to the village centre. Not only would this be devastating to the businesses concerned but it would also be devastating to the population of Bromborough. Without question, there is a definite need for many of these businesses and whilst local planning officers might argue there is a large retail park in Bromborough for shoppers, where are people going to go for the banking, estate agents, solicitors and hairdressing facilities! Notwithstanding this, Wirral Borough Council would also be at a loss, since there would be less revenue going into their coffers, from business taxation rates.</p> <p>The development of Bromborough over the last 30 years has been phenomenal. The building of a retail park and many trading estates, together with an improved village centre, has created thousands of jobs, which has enabled the town to prosper. Clearly, if the village centre is to continue prospering, there is a definite need to retain this car park, as opposed to creating needless unemployment.</p> <p>Obviously, whoever thought of this ludicrous idea to remove the car park, knows nothing and does not care one iota, about Bromborough.</p> <p>I object immensely to the proposal to develop Allport Lane Car Park and feel this amenity needs to be kept, to ensure businesses in the village, retain their viability and keep local people in employment. Without the car park, the village will surely fall into decline.</p>
DOR00956	<p>Truly sympathetic to the need for more developments to meet the housing needs and am aware of national targets for the same, but the Council needs to reconsider their proposals, act responsibly and be above board in their decisions. Objections are as follows:</p> <ol style="list-style-type: none"> 1) Wirral's USP: Wirral has been a desirable place for people working in West Cheshire /Merseyside, despite the fact that commuting on public transport isn't straightforward and it works out expensive to use cars. But people still choose to live here for the greenery, the open spaces, the cleaner environment, the peace and quiet. If we lose it: <ol style="list-style-type: none"> a) Our historic towns/villages will turn into concrete jungles akin to cities like Liverpool or Birmingham. b) Wirral will have nothing more to offer, which other cities/towns cannot. This could adversely affect local society and businesses in the long run. c) It will no longer be a safe and quiet place for our growing elderly population who want some peace in the twilight of their lives. 2) Unaffordable housing: It is a well-known fact that building more houses doesn't necessarily mean that the people who need them, can afford to buy them. The houses built on Green Belts invariably will be flogged as "luxury" homes, which will be extremely overpriced, with a much smaller square footage than stipulated. It will be unaffordable for most people and this completely defeats the purpose of the exercise. It is essential for the Council to learn from their previous experience with developers or external consultants, whose only agenda is profiteering from hard-pressed councils and households. 3) Environment/Climate change: The Green Belts are undoubtedly, a sight for sore eyes and a breath of fresh air, for the young and old alike. The National Ecosystem Assessment supports such an argument. In fact, the NEA recognises the huge value to society of agricultural land, both in terms of food production and in 'cultural services' (such as the sense of wellbeing produced by seeing an agricultural landscape). In the face of climate change, the Green Belt is also likely to have an increasingly significant role in storing carbon and preventing flooding. The Council should take pride in the fact that CH63 is the best postcode to live in, in the UK. And Lever causeway is in CH63. <ol style="list-style-type: none"> a) Cycle path: It is the only cycle path nearby where we can take our kids biking or go for a run, without fear of being run over by vehicles. If the fields are built upon on either side, we lose the route once and for all. b) Traffic: Lever causeway into B5151 during peak hours is slow, around the double-roundabout. Traffic from Lever Causeway > station Road toward Barsnton Road is also a bottleneck. So any development in this area will cause an exponential increase in vehicular traffic (2 cars/ household), without any guarantees for expansion of roads. c) Speeding: As it is, cars speed down Mount road (from the Lever causeway roundabout) towards Prenton. I had raised this as an issue some years ago but was told the council did not see it as a priority, as "there had been no crashes on this road". The road towards Barnston is a country road with national speed limit. If houses were to pop up on either side of Lever Causeway, the speeding in either direction is going to be a much bigger issue and the crashes will be inevitable. d) Infrastructure: We shouldn't wait for a fatal crash to happen before measures are put in place. The Council is duty-bound to find the resources for road safety, roads expansions and traffic calming before allowing developers onto these green spaces. <p>I request the Council to have a vision and foresight for the cultural and environmental future of the peninsula and to seek alternatives to the Green belt developments for housing.</p>

DOR REF	RESPONSE
DOR00957	<p>Objection to the proposed plans to build on Greenbelt Land in Bebington:</p> <ol style="list-style-type: none"> 1. There is sufficient land in urban areas to build upon. Peel Holdings aside - this land should be prioritised first. 2. Wirral and Central Government statistics show a decreasing population in Wirral. Not an increase. So why 12,000 new homes? 3. Lever Causeway and surrounding Green Belt areas are huge sites! This will strip away valuable open space that the current population of the East side of Wirral want and need. 4. There will be an overarching destructive effect on taking away the current Green Belt land. Historic sites, Conservation Areas and prime Agricultural land will be lost forever. 5. We are a small, squeezed peninsula surrounded on three sides by water and our open spaces are precious. Already, there are concerns about increased traffic and associated pollution. The proposed building in and around the Lever Causeway & Storeton areas will not reduce this - only increase. <p>Please put this submission with the many others I suspect will have been received in objection to this proposed, destructive plan.</p> <p>I grew up 2 minutes' walk from Lever Causeway and have lived here for 50 years, and being able to walk around this beautiful area is a huge part of our lives and we don't want it to disappear.</p>
DOR00958	<p>Against building houses on SP042 & other nearby green belt areas to Spital. There are brownfield sites needing development to save the green belt.</p> <p>Also there is redevelopment of houses in rundown areas which could be done instead of the easy option of giving up green belt.</p>
DOR00959	<p>Anger at proposals to build on Wirral Green Belt, and in particular, Greenhouse Farm in Greasby. I do not believe there is justification for building luxury homes on desirable Green Belt for profit rather than building council houses, starter, and affordable homes on brownfield sites which are needed as a matter of priority in order to meet the greater housing need in Wirral. Greasby is a small village with oversubscribed schools and doctors' surgery as well as roads that are cracking due to wear and tear from the current volume of traffic. Do not want my home, community and area to be swallowed up in urban sprawl that would be out of keeping with houses from the 1930s and 50s, and therefore, destroy the character of the area.</p> <p>I strongly oppose the re-designation of Green Belt for house building and request a re-evaluation of the housing needs for Wirral, taking into account the historical population and household numbers and trends, the recent lack of economic growth and the likely dramatic effects of Brexit on the economic prospects for Wirral.</p> <p>Peel Holdings have planning permission to build 13,500 homes at Wirral Waters. Why, after 10 years, have no homes been built?</p>
DOR00960	<p>I do not support any plans for building housing on greenbelt land.</p> <p>I would ask that you seriously reconsider your plans. Once our greenbelt has gone it can never be recovered.</p> <p>I live on Pensby Road opposite the green area bordered by Gills Lane, Barnston Road and Whitfield Road. This road is already so busy with traffic that I struggle to get out of my driveway. I am a Governor at the local primary so I am also well aware of the problems families have getting their children into local schools.</p> <p>I again respectfully request that you seriously reconsider building on our greenbelt land. Response to Wirral Borough Council Local Plan Consultation October 2018</p> <p>[THEN SAME AS DOR01052]</p>
DOR00961	<p>Oppose the release of Green Belt land for building purposes. There seem to be many reasons for protecting our Green Belt and none for allowing parts of it to be built on.</p> <p>In general:</p> <ul style="list-style-type: none"> *There does not seem to be the requirement for the number of houses proposed. *Those houses that are required can be accommodated on Brown field sites. *Increasing the population on the Wirral by so many would put enormous pressure on the existing infrastructure, especially at peak times, and also the healthcare facilities and schools. (I have had to wait a month for a non-emergency appointment even now). *There would be a detrimental effect to wildlife with habitat destruction. *It would change the whole character of West Wirral, encouraging urban sprawl and reducing its attraction as a tourist destination and so affect a number of businesses providing for that market. *Our green spaces are our opportunity to make some impact on global warming and all that it entails, especially if we encourage the planting of trees. Many mature trees were felled on the plot behind our house in anticipation of green belt release. This is encouraged by weak policies about our Green Belt, which lead developers to "sit" on land waiting for the council to "cave in" about allowing developments to go ahead. <p>I feel the council should show a clear determination to protect all of our Green Belt.</p> <p>I do not think that any of the Green Belt should be released as it sets a precedent for "nibbling away" at green spaces that ultimately has a huge impact but I have a specific interest in Green Belt behind our house ; Greenheys Nursery and adjacent land SP059B, SP059C and SP059D. This site may look enticing to developers and planners as it may be considered "just filling in" between already existing houses, but this site has importance to the wildlife in the area. We have bats, owls, hedgehogs and numerous bird species that frequent the site. My family have lived in our house for over 20 years and in that time we have seen a depletion of bird species in this area that would only continue if more habitat were destroyed. Since the felling of many of the trees in the nursery there has been standing water on the site during the wet winters i.e. flooding, which did not occur when the trees were growing there.</p> <p>In conclusion I think the council should argue our case with the government for not needing so many new houses on the Wirral and pledge to protect ALL of our Green Belt.</p>

DOR REF	RESPONSE
DOR00962	<p>Further to recent press and flyers regarding the above development plan I felt I had to write in support of reducing the amount of housing proposed in this GREEN BELT area. My main concern, as I live off Poulton Royd Drive, is the congestion and possible danger with more cars and general traffic as a result of more development, not only on the estate itself but of course also at Spital Cross Roads and further afield at Junction 4 of the M53. I have need to go to London and via the Dartford Crossing to visit family, and the congestion on the journey there is unbelievable. I think a valid comment is that you cannot un-gridlock traffic congestion by simply asking drivers to leave there cars at home and once gridlocked always gridlocked. As a resident I delight in the benefit of living in this delightful, healthy and beautiful area, which I know caused protest for many years as a site of development, which is why I think a reduction to a much smaller development proposal would be more agreeable for all concerned, or of course no development at all. My other big concern is that if this development took off in the amounts of properties mentioned in the press of 1600 dwellings, where are all these people going to go to benefit from healthy air, walking the footpaths and enjoying the benefits of the beautiful farm land and countryside? As I live in Colmore Ave. we see people all the time out walking down to the fields with children, dogs, the elderly, or just going shopping, or for a snack, to the farm. Please do not allow this bliss full and healthy life style to be taken from us. I feel we are truly blessed living here and that others should have the chance to do the same but, not at the cost of ruining the very sole of the area, which the proposed purchasers probably would be attracted to in the first place! Incidentally every visitor comments to me, this is the "most beautiful estate and area they ever thought possible to be sitting so close to such industrial and built up areas of Deeside and Merseyside.</p>
DOR00963	<p>Objections to any proposed building on Wirral greenbelt land. The housing need numbers are exceptionally high when compared with various scenarios in the SHMA study ,the methodology used is outdated. Economic growth is slowing and lower number of buildings are required. We need to prevent the sprawl and merging of our urban areas and neighbouring localities into one another. Any building will greatly impact on traffic volume/pollution/noise and stretch already struggling council services. There in enough spare capacity within existing Brownfield sites to satisfy the building numbers required. Specifically in our area of Spital the traffic and road use is very congested to the point of gridlock at peak times with there being only one access point to the housing estate . Any removal of Greenbelt land via additional buildings would only serve to decrease the quality of life for its inhabitants and damage the area irrevocably.</p>
DOR00964	<p>I object to the release of greenbelt land near the Lever Causeway and Storeton Woods and in addition to the release of further greenfield sites on the Wirral.</p> <ol style="list-style-type: none"> 1. Population Growth on the Wirral has remained largely stagnant since 1996. [attached population on the Wirral obtained from the Office of National Statistics] Please can you detail and explain why there is a projection for new housing on the Wirral if there is no population growth? 2, There are approximately 5,000 empty properties on the Wirral. 3. The Wirral Waters project will also bring an additional 13,500 new properties in a 40 year period. 4. There are also brownfield, mixed use sites and urban areas in which we should build on. 5. Building on the greenbelt will fundamentally change and destroy the character of the area. The Lever Causeway, Storeton Woods and the open, surrounding areas give local residents a lovely area to relax and exercise 6. Natural views will be destroyed, especially on Mount Road. 7. Should further houses be built, this will also bring increased traffic and congestion. 8. Increasing the urban sprawl on either side of the Lever Causeway will destroy the aesthetic nature of the environment. 9. Prime Agricultural land will be lost. 10. I live in the Mountwood conservation area, these proposed developments will destroy its setting. <p>I would like to understand what the next steps are in the process. Please keep me apprised.</p>
DOR00965	<p>The proposal to implement a green belt site to the land adjoining Eastham House will limit any opportunities for redevelopment, reconfiguration or transfer. While sympathetic to the intentions of the application, we are conscious that this process may ultimately restrict our capacity to offer the best possible affordable housing for our customers and the borough. On this basis, regrettably we must object to the proposal on this occasion.</p>
DOR00966	<p>At this very early stage it is difficult to say with any certainty what impact the proposed allocations will have on the Strategic Road Network. However, given their scale and locations, there is quite a high probability that the impacts of your plan could be significant, both in the local vicinity and further afield. Whilst the M53 between junction 1 and 5 does currently operate within capacity, the section between junction 5 and junction 11 capacity is somewhat more limited. The proposals may also put significant pressure on a number of motorway and trunk road junctions. As a result, it is essential that the transport impacts of your proposals are assessed as part of your plan-making process, with any infrastructure needed to support it being identified at the earliest possible stage. In doing so, ensuring that mechanisms for delivery of such infrastructure can be identified and any safeguarding measures incorporated where appropriate. Of course, we would expect that measures to reduce demands on highway infrastructure will also be incorporated in the first instance. Indeed, proposals that make alternatives to private transport use a more attractive option would be a</p>

DOR REF	RESPONSE
	<p>welcome inclusion. This would be a good opportunity to have a holistic plan in place to try and ensure that sustainable travel options become the mode of choice, thus reducing potential demands on existing and constrained infrastructure. It is likely that individual sites may still require their own Transport Assessment at application stage. However, to ensure adequate infrastructure requirements are identified to accommodate the cumulative infrastructure of the plan, an assessment at plan making stage is also essential.</p>
DOR00967	<p>Register my views and objections in relation to parcels of land that are being proposed for future development or re-designation within the Wirral Local Plan and in particular the ones that affect our immediate area, namely green belt and agricultural land west of the Wirral Way in Heswall.</p> <p>1. Issue with the number of houses required - I understand a Councillor has declared that the Wirral will be required to build approximately 12,000 new homes by 2035 to meet Government targets. However, it has been highlighted that these figures are erroneous and misleading as the figure is based on incorrect calculations. The housing shortfall rather than being declared as 7,390 is closer to 4,990. Furthermore, taking into account the Wirral Waters projection of 6,450 homes plus some 4,500-5,000 vacant Council properties there is absolutely no requirement to build on Green Belt land or re-designate it for future purposes.</p> <p>2. Validity of the consultation process - It has been suggested that the Government have revised the number of dwellings that need to be built each year which would significantly reduce the overall number required over the next 15 years. However, it is understood that [council officer] has declared that there would be no revision to the Council's current arrangements. In addition the Council has failed to publish the 'Strategic Housing Land Availability Assessment (SHLAA)', the 'Broad Spatial Option Revised Assessment Report' and the 'Development Viability Baseline Report'. It is difficult to see how the consultation can be considered valid under these circumstances.</p> <p>3. The Council's 'Green Belt Review Methodology' - In this the Council effectively states that it complies with NPPF2 which itself states, in Para 136, that "Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified...". It also instructs that the "strategic policy-making authority should be able demonstrate that it has examined fully other reasonable options..." and further states that "inappropriate development is, by definition, harmful to the Green Belt and should not be approved...". The council has had a good record, I believe, of protecting Wirral's Green Belt and it would be a travesty if it were to ignore its responsibility to the residents of Wirral by using Green Belt, especially prime agricultural land, to be used as infill development and thereby destroying the Wirral's special environment. In your initial green belt review Para 6.4 you state that "Land to the west of the Wirral Way has not been included, because the role of the Wirral Way in defining a clear physical edge to the existing urban area and the constraints associated with the national and international designation of the Dee coastline". Sliding in an appendix in which a re-designation of areas west of the Wirral Way is not open or transparent and the timing of some of the additions is suspect.</p> <p>4. Infill Villages and the environment - The Council's position on infill villages is unclear but the fact that the criteria for assessment has not been released in time to be properly considered before the cut-off date for responses to the latest consultation is extremely worrying. The Council is trying to justify its position by claiming that parcels of land are pre-developed which is stretching the definition. The detail regarding numbers of dwellings, etc that could potentially be built on such parcels of land and the fact that certain parcels have been sold off by owners to developers would suggest that the Council has already been in discussions with developers and that these parcels of land are being primed for development even though it contradicts the Council's own green belt policies.</p> <p>5. Coastal Zone & Agriculture - The principles for the Coastal Policy state "preserving and enhancing the character of the coast, in particular, its national and international importance for nature conservation". The parcel areas west of the Wirral Way are all located within the Coastal Zone. The policy also states that "protection of landscape quality particularly on undeveloped coastline is of considerable importance".</p> <p>Considering proposals for development on agricultural land the local planning authority will seek to prevent i) the loss of Wirral's best and most versatile agricultural land and ii) the severance or fragmentation of a farm holding.</p> <p>Why is the Council abandoning such fundamental principles? Furthermore the Government is now placing greater emphasis on preserving agricultural land. Wirral should look to the future and help create a local farming community that avoids environmentally damaging transportation and boosts local produce.</p> <p>6. Infrastructure - It is not difficult to assess the damage to the local infrastructure if development was allowed west of the Wirral Way. There are only 2 ways out of Lower Heswall, up Station Road and Wittering lane. Station road is sloping, relatively narrow and comes to a blind corner when it meets Village road. Increased traffic would significantly increase pollution and could also become a major accident area. Station road also comes down to Davenport and Riverbank which are used as extensions to the Wirral Way and used by Horses, walkers, cyclists, etc. There would be an inevitable conflict between vehicles and the safety of the public and again the increase of pollution on the health and welfare of recreational users. I believe the Council has a 'Duty of Care' in such conflicts as well as a responsibility on improving air quality and reducing the borough's carbon emission footprint.</p> <p>7. Regeneration of Urban areas - I understand that one of the main purposes of the Local Plan is to regenerate urban land by the recycling of derelict and other urban areas. However, there appears to be reluctance by Council to put pressure on developers and builders to pursue this policy. The Council does appear to be under pressure from such developers to pick the more profitable path of re-designation of green belt land. I would expect the Council to prioritise its duty to residents rather than the profits of developers who do not reside in the borough and bring no financial benefit to it.</p>

DOR REF	RESPONSE
	<p>8. Biodiversity and Environmental Impact - Green belt land west of the Wirral Way acts as a buffer for the coastal zone protection areas and offers environmental and wildlife preservation for protected species. It acts as an overspill during certain parts of the year for migrating birds that come because of the Wirral's wetlands. It's also recognised as an SSSI and the areas around us have official legal, international, European and national status. This land is also recognised as prime agricultural land which, as stated before, is covered by one of the Council's fundamental principles. If we lose this land to development we lose a recognised and important conservation area.</p> <p>Conclusion - Wirral Borough Council has a duty first and foremost to its residents, their living conditions, recreational spaces and air quality. People move to the Wirral for a number of reasons which include its open countryside, coastline, varied options for recreation as well as its location close to Liverpool, Manchester and Chester for work. Wirral has a unique position in the Country and being a peninsular it has a climate that encourages biodiversity and has recognised national and international significance especially its coastline. If the council does not protect such areas it would jeopardise its own future and the future of rare species that could, due to climate change, potentially migrate here. The Wirral coastline could eventually become part of a world heritage site but not if proposals to allow green belt land west of the Wirral Way to be developed proceed.</p> <p>The Council has a duty to put the health and wellbeing of its residents before the profits of developers who are outside of the borough and who have no interest in the future of Wirral other than as a potential cash cow. There is a direct correlation between mental health issues and the lack of open space. If development of these green spaces is allowed then there will be a significant increase in mental health issues as both pollution and living conditions take their toll. This in turn would put pressure on an already stretched health service and lead to anti-social behaviour which, in turn, would affect policing, social and educational services. The future financial penalty to the borough would far outweigh any short term gain. Once green belt has gone for development it has gone forever. Future generations will pay the price for current short sighted policies and the price could be high indeed. We say that the Council should aggressively protect its green belt and protect the future of Wirral residents. We want the Wirral to be high on the list of places to live and see the redevelopment of brown field sites such as the dockland area as the way forward for regeneration of the Wirral.</p>
DOR00968	<p>There is an error in your Summary of Initial Green Belt Assessment September 2018. On page 52 the agricultural land use for SP030 has been classed as pasture and horse grazing. In fact, the land under SHLAA1819 on site SP030 is actually used for farming arable, and has been for many years. Recent soil reports show the site as containing very good quality soil. SHLAA1819 has already had a crop harvested this year and is currently growing winter wheat. The land further down Lever Causeway between Marsh Hey Covert and Little Storeton Village is also being farmed. Therefore a very large proportion of SP030 is actually used for arable farming and not horse grazing as indicated. At a Council Meeting on 15 October, Motion 3 was voted on and carried unanimously. The first paragraph of this motion reads, "This Council requests that renewed importance should be attached to the protection afforded to agricultural land as the responses to the Local Plan are considered. Land that is currently in productive agricultural use should not be removed from the Green Belt in view of the need to safeguard future food supplies." [attached Photograph]</p> <p>Also, as this parcel of land abuts Marsh Hey Covert, and covers an area between Marsh Hey Covert and a copse behind Stanley Avenue, the notes should also include that the area may include supporting habitat, as there is evidence of badger activity, owls and bats in this area. The areas also give protection to other local wildlife whose natural habitat will be eroded by any development [SAME AS DOR03057]</p>
DOR00969	<p>Proposed release of Green belt land around Heswall primary school.</p> <p>There are many issues that have caused me concern and the main one being the increase in the amount of traffic that will be seen. Downham rd. North/South and Whitfield lane already struggle with the volume of traffic at peak times and especially during the school run. Even with a speed limit the speed at which drivers cut through these roads is unbelievable. My son had a near miss last year and this was due to the speed and volume of traffic and that there were 4 new houses being built that meant we were forced to walk in the road with our children as builders had in some cases completely blocked the pavement with their vans and cars. I can't imagine the dangers that we would face on our daily walk to school if a housing estate were to be built. If this housing estate were to be built how is our local school going to accommodate all the extra school places that will be needed. Heswall primary school is at the heart of our community. It's pastoral care is second to none as it is a small school that is able to offer this.</p> <p>How would you guarantee that my children's school retains this quality? The school is known as the school in the woods and recently won an award for the 'science under the stars' event that was held in and around the school grounds. The children are, quite rightly, very proud of this achievement.</p> <p>Wirral is known as the leisure peninsula and people come from all over the country to enjoy the wonderful walks and views that we are so lucky to live amongst. How will you as a council guarantee that we will still attract visitors to this wonderful area, who have probably come to escape their own urban sprawl with no open green spaces?</p>
DOR00970	<p>This proposed site is in Egerton Park which is an unadopted road; property owners each pay £5 per month/£60 per year for the upkeep of the road - my point is, that if the council are building properties in Egerton Park (this is not the only site in Egerton Park), are they going to adopt the road; if not, then the council will need to pay the committee the park fees for each property that they build until they sell those properties - if they are rented, the owner (council) still have to pay. I would also like to know if the sewage pipes are going to be upgraded as they are old and already backing up in places around the park especially right outside another of your proposed sites in the park! The road is paid for by the residents so it would need to be repaired by the council if any damage occurred during construction and original walls and trees must be kept on all sites. I have no objections to houses being built in the Park as it's more appropriate to the area than flats.</p>

DOR REF	RESPONSE
DOR00971	<p>I consider the proposed use of fields adjacent to Marlfield Lane for housing to be inappropriate for the following reasons</p> <ol style="list-style-type: none"> 1. The land is a green space corridor to separate the villages of Pensby and Barnston in line with the philosophy of the Green Belt 2. The junction of Gills Lane with Barnston Road is dangerous due to its close proximity to the bend coming out of Barnston Dip. Additional traffic emerging from Gills Lane would increase the risk of accidents. Any attempt to re-appropriate the junction would change the character of the Barnston Conservation area.
DOR00972	<p>Objection I am shocked at the amount of greenbelt that is outlined for release for possible building of dwellings. After attending the Consultation meetings my objection to this plan is even stronger. The new housing figures must surely stop this local plan and it must now be redrawn using the latest figures. I fully back all the objections regarding loss of farming, air quality, wildlife and the overall change to the look of our lovely peninsula. We really must build on brownfield sites and use all the empty properties across Wirral, before any greenbelt is considered for release.</p>
DOR00973	[SAME AS DOR00455]
DOR00974	<p>Object to the proposed release of green belt land around the Thornton Hough area.</p> <ol style="list-style-type: none"> 1. The estate on which I live is a small, mature development surrounded on three sides by top grade agricultural and by the very busy B5136 road on the fourth side. To extend the estate would impact onto areas of the high grade agricultural land and have a detrimental effect on the openness and beauty of the green belt. 2. In the summary of Initial green Belt review it is stated that "The area is part of the Thornton Hough rural farmland Landscape Character area where the quality and condition of the landscape is good and the landscape strategy for the character area is "conserve". This character area is sensitive to any changes which would reduce the local distinctiveness of villages or increase the prominence of roads or urban edges". It is therefore not suitable for release from the green belt, or to be built on. It is imperative that the character of Thornton Hough is retained. 3. It is therefore clear now that the dwelling requirements in Wirral for the next 15 years should be downgraded due to the recent figures released by the Office of National statistics and in light of this new information can the council give an undertaking that green belt boundaries will not be redrawn. 4. The development at Wirral waters, along with Brownfield site availability and the 4000-6000 empty units that exist that could be brought back into habitable use will more than suffice the requirement of 7320 units over the 15 year period. There is no justification for placing a single brick on any land in and around Thornton Hough village with this alternative housing availability.
DOR00975	<p>Thank you for alerting us to the potential use of green belt land for housing projects in our locality. While we would, naturally, abhor any development of green belt land other than for agricultural or recreational use we understand the pressures placed upon the Council by local needs, if not from the Government. We can foresee several objections on our and our neighbours' part which I shall enumerate below:</p> <ol style="list-style-type: none"> 1. Interference with an extensive view we and our neighbours have enjoyed over many years (inevitable NIMBYism) 2. We would have great concerns over traffic on the A540 should access road(s) to a residential (or other sites) required. As you well know the A540 is one of the busiest trunk roads in this area with a consequential history of incidents (a significant number fatal), drivers regularly misjudge the speed of oncoming traffic (which often exceeds the statutory 40 mph) when turning out of or into junctions nearby. The route is heavily used by large commercial vehicles (not just from the Aldi depot). The potential use as a 'rat run' should any access roads connect to both the A540 and other parts of the road network would increase the danger both to other road users on the A540 and to residents of any potential housing development. 3. A large proportion of residents within (and probably outside) the locality would be adversely affected by the loss of recreational amenities including a young children's play area, playing fields, dog walking area and general green open space. <p>We are sure there are similar objections from local residents to the development of other green belt areas and can only hope that while currently unutilised brown field should be utilised to their fullest extent that the Council will take the concerns of Wirral residents into account when granting planning permission.</p>
DOR00976	<p>Stern objection to plans to once more to remove more of our precious green belt in the Saughall Massey area.</p>

DOR REF	RESPONSE
DOR00977	<p>Strong opposition to the consideration of the development of Green Belt land.</p> <p>Green Belt land is of great importance to the community on the Wirral, encouraging tourism, recreational activities, preserving wildlife and the rural environment. Encroachment into this area cannot be justified. We wish you to consider the following points:</p> <ol style="list-style-type: none"> 1. A Locally Relevant Plan - While appreciating the National Government's identification for new homes, Wirral Council's plan must be relevant locally. The population of Wirral is set to decrease over the next 10-15 years and there is little prospect of inward migration, hence the need for 22% of the Green Belt land to be identified for development cannot be justified. It should be noted that development of Green Belt land should only be in 'exceptional circumstances'. Green belt land is protected to prevent unrestricted growth of urban areas and maintain openness. In fact, National Planning policies attach great importance to the preservation of Green Belt land and building would be inappropriate. Several large properties in Heswall have recently been demolished and replaced with apartment blocks allowing multiple occupancy. We do not believe this has been taken into consideration in the Wirral Local Plan. 2. Inadequate Infrastructure - We wish to now address the land on the west coast of the Wirral. According to the Wirral Local Plan the area between the Wirral Circular Trail and the Dee River is under consideration for 'infill villages'. Surely, Wirral Council cannot support this proposal with regard to infrastructure alone. The current roads are inadequate, being too narrow and currently congested. The junction at the top of Parkwest, The Wirral Circular Trail, Wittering Lane and Farr Hall Drive is already a hazard for pedestrians, cyclist's horse riders and cars and any further increase in traffic would be dangerous. Equally the junction of Delavor Road and Wittering Lane is perilous, being on a sharp bend just after a bridge. The current provision for drainage and sewerage is only barely adequate now and any increase in usage would overstretch these services. Properties in Parkwest have already been subject to household flooding, which took some considerable time to resolve by the Water Company involved. The current provision of schools and public transport is wholly inadequate for any increase in the local population. 3. Notwithstanding these practical issues, the Green belt land along the Dee Estuary is an exceptional environment with incomparable views across the Estuary to North Wales. The introduction of 'infill villages' in this region of Green Belt land is totally out of keeping with the conservation of the rural nature of the area and is to be resisted. The habitat along the coast of the Dee River and is an area of international importance for migrating birds and wildlife, such as badgers, bats, owls. Any destruction of this environment would be injurious to these species and must be repelled by Wirral Council, who have always prided themselves on protection of wildlife. And conservation. Once developed this area would impact on those using the Wirral Circular Path and the footpaths surrounding, destroying the outlook across to North Wales. <p>In summary, violation of the Green Belt Land should not be tolerated on grounds of superfluous inadequate infrastructure and destruction of internationally recognised habitats and preservation of the environment.</p>
DOR00978	<p>Protest in the strongest possible terms against any proposal to use any of the green belt land in and around Saughall Massie for housing or other building development, especially in the fields between Saughall Massie and Moreton.</p> <p>Any such development would encroach significantly on the local countryside as neighbouring habitations spread and effectively merge, destroying the historic setting and character of Saughall Massie, wiping out agricultural activity, annihilating yet another ecosystem and removing a much loved and treasured natural resource.</p> <p>The area is highly valued by residents of all ages and abilities for the contribution it makes to improving the quality of their lives. Not only does it provide a historic setting, it provides educational and recreational interests through its topography and wildlife. The open spaces provide escape from urban clutter. The contributions these elements make to the well-being of residents and visitors alike should not be underestimated in an increasingly crowded.</p> <p>Please save the fields of Saughall Massie and so look after its residents.</p>
DOR00979	<p>One of the attractions of the area in my view is that there are reasonable areas of countryside providing a break to urban development.</p> <p>Even if the plan is to restrict building along green corridors, this is damaging in my view and cannot be reversed. I also believe that over time these developments will inevitably expand. Releasing areas of Green Belt will be the start of a disastrous trend.</p> <p>I understand that central government are imposing the housing policy requirement, but will the proposal really solve the housing problem? How will the properties be prevented from ending up in the buy to let market? Without incentives and help to first time buyers in obtaining loans, this will be the result.</p> <p>Also, there are alternatives. There are Brown field sites in many areas and surely these should be looked at first before even considering Green Belt.</p> <p>Based upon forecasts and statistics, population growth is not expected to be a big issue in driving future demand in Wirral, so are the plans misguided?</p> <p>Governments change over time but policy driven mistakes of this nature cannot be easily reversed.</p> <p>I am very concerned by these proposals and would like to make my views known.</p>

DOR REF	RESPONSE
DOR00980	Green belt plans SP004A/SP005A/SP002C Saughall Massie - I strongly oppose to any future development. This area is a conservation area, it is agricultural land, there are brown field sites that could be utilised. We have already lost some of our greenbelt in the building of a new fire station. There are no exceptional circumstances for building on greenbelt land. The traffic will increase, the pollution will increase. Saughall Massie was designated a C A in 1974. This is a lovely little village and has been for a long time, please help us keep it this way and look at brown field or other sites.it would not be fair to select this area again
DOR00981	<p>Firstly, I would like to make clear that I feel that this consultation is flawed and should be re-run. Part-way through the consultation it became clear that the housing requirement estimates, as previously warned, were far too high.</p> <p>When the latest available ONS data was made available the housing estimate significantly shrank, and the proposals no longer bare any resemblance to the requirements, making comments on the proposals void. However, given that the consultation has not been halted and re-run with a plan based on the correct figures, I would like to put my comments on record. As well as disputing the number of houses required, which hopefully has now been accepted, I also dispute the requirement to build on the greenbelt when other options exist. Empty properties across Wirral have been being brought back into use and should be providing at least part of the housing needs, perhaps at a faster rate than the current 200 per year. As well as empty properties, it is also vital that Wirral tackles empty brownfield sites that are being sat upon by developers, either with or without planning permission. The number of planning permissions granted but where no building has commenced is around the 15,000 – 20,000 mark on Wirral, with a large number being part of the Wirral Waters project. Hopefully, Wirral Council can improve relations with developers, particularly Wirral Waters, to ensure that these homes are built. The Campaign for the Protection of Rural England, in their report “Space to Build”, also suggests a number of other alternatives to building on the green belt.</p> <ul style="list-style-type: none"> • The airspace above existing properties can provide extra homes by building up rather than out. Density of housing can also be increased in the developed areas that we already have. • Car parks can be re-purposed for housing, or even shared usage with housing above car parking spaces, as has been achieved by some developments on the continent. • Convert the land occupied by disused garages into viable land for housing. • Reclaiming land from roads and roundabouts provides another avenue for exploration. • We also have docklands which other areas have used to home houseboats. <p>As well as the alternatives to building on the green belt, it is also important to acknowledge the importance of it. The green belt helps to halt urban sprawl, and the distinct Wirral communities would suffer as they merge as the green belt is eroded.</p> <p>Research shows that 70% of the houses proposed on green belt would not be affordable and therefore not helping to tackle the housing crisis that the UK faces. Also, our green belt incorporates some high quality agricultural land, which we will need even more in the future if Brexit happens. Green spaces include areas that people use for recreation and exercise. The loss of this may potentially lead to public health issues, as Wirral residents lose their access to these green and open spaces. There are specific concerns about pieces of land in Clatterbridge. Firstly, there is mounting evidence that the land around Claremont Farm may be the site of an important battle, involved in the very beginning of England. Secondly, many of the proposed sites are close to the M53 motorway. Research shows that there is a danger in living close to motorways due to the pollutants from the high volumes of traffic. This would make large swathes of the proposed sites unviable due to health concerns.</p> <p>In summary, I acknowledge the housing crises that the UK faces, however, this is not felt uniformly across the country. The Wirral, as the ONS figures have shown does not have the housing needs that warrant the decimation of our green spaces. There are alternatives that exist, which may of course be more expensive than building on green belt, but what price do we put on our natural resources. Finally, the green belt plays an important role, and as has been often said, once it is gone, it's gone forever.</p>
DOR00982	[Petition received through change.org with 3,000+ signatures]
DOR00983	<p>I would make the following comments with particular reference to Green Belt land to the east of the M53.</p> <ol style="list-style-type: none"> 1. In an untitled letter dated August 2018, from WIRRAL, delivered to my home and signed by a Leader of Wirral Council. He wrote “Wirral is blessed with a stunning environment – miles of coastline, beautiful countryside and large areas of green open space. 46% of Wirral is currently classed as Green Belt.”The above statement suggests that the 46 % classification of green belt is considered to be an asset by the council, and appears to be stated with a degree of pride. The consultation suggested a reduction to approximately 35%. That is a reduction of 24% of our asset. The Wirral is a desirable place to live, in part because of the green belt. The council should be defending the asset on environmental. Social and commercial grounds. This council will be remembered as the council which, unnecessarily, opened the door to a 25% reduction in Wirral’s major asset. 2. During the consultation we were told that removal of green belt status would not affect SSSI’s, Country Parks, Nature reserves etc. and that owners such as Poulton Hall did not wish to build anyway. If this is true why would a responsible council elect to remove green belt designation from these sorts of areas? The Council implies there will be no housing and therefore no benefit for the Local Plan. Next time the Councillor composes a similar statement it would be with reduced pride in a reduced asset. The Council logic is criminal. 3. I also endorse all the comments made by Cheshire Wildlife Trust. 4. The original numbers of homes, 800 for the lifetime of the plan, 12000 by 2015 is now reported as having been reduced significantly. Surely it is disingenuous to be consulting on a figure which

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	<p>the council knew would be reduced during the consultation period.</p> <p>5. The National Planning Policy Framework is clear at chapter 13 Wirral has a defined Green Belt. Clauses 136 and 137 are particularly relevant. Since the housing requirement has dramatically change since Wirral Council’s previous strategic reviews. It must surely be the case that a new strategic review is undertaken.</p> <p>Many of the clauses are not relevant to Wirral as Wirral already has a defined Green Belt. Attempts to redefine the boundary as the M53 might be considered to be covered under clause 139 (f) but the whole of clause 139 is predicated on defining boundaries. The Wirral Green Belt is defined and was defined when the M53 proposition as a physical boundary was consulted on.</p>
DOR00984	<p>I am a resident of Barnston Village (not Settlement with Irby, Pensby and Thingwall as you conveniently state.....and where did that come from and where we ever informed??) Barnston Conservation Society.</p> <p>I would also draw your attention to the Independent Assessment on behalf of the Wirral Society for the Wirral Green Spaces Alliance, not forgetting the report produced by Wirral Wildlife.</p> <p>I am totally opposed to any Greenbelt Development until all other options have been exhausted and all Brownfield Sites developed. The whole basis of the Wirral Local Plan appears suspect. Wirral needs to retain its Greenbelt for Tourism, Farming, Wildlife, Environment and the residents of Wirral.</p>
DOR00985	<p>We note that there are a number of proposals relating to sites within Egerton Park, most notably a number of derelict sites owned mostly, but not exclusively by Salisbury Developments Ltd. We have the following observations and suggestions to make:</p> <ol style="list-style-type: none"> 1. We are unsure as to the status of the numerous sites and the Local Authority’s proposals. As privately owned land it is not clear how or if the Council can insist that the sites are brought into use other than by a compulsory purchase order or some other lawful authority. 2. We have been in dialogue with elected members and also with the Assistant Director: Major Growth Projects and Housing Delivery on numerous occasions over several years to request that the Council initiates steps to force the owners of several derelict sites in Egerton Park into their use for residential properties. To date, after several years of trying we have made little progress. We therefore broadly welcome the Area plan. 3. For the avoidance of doubt we welcome any steps to bring brownfield sites in Egerton Park into use for residential property. 4. We have a number of concerns about developments in Egerton Park. In particular, the infrastructure is Victorian and privately-owned (by the Residents Association) including the entrance pillars and the un-adopted road surface and is maintained solely by us as property owners and residents. Large scale development, for example for commercial use, blocks of flats or apartments will put undue and unsustainable pressure on traffic flow and highway maintenance. 5. The Park is already home to several Houses in Multi Occupation and to several nursing and residential homes. Any continued growth of that type of development will further dilute the residential nature of our estate, increase the transient population who tend to take no interest in our community and who typically do not pay fees towards the upkeep of the road and other infrastructure, insisting that they are tenants not property owners. 6. There has been a Tree Preservation Order relating to the Park in force since the early 1970’s but it is frequently flouted by developers and, although incidents are reported to the Council no enforcement action ever seems to follow. In any new proposed developments we would like to see the TPO upheld and specified within any planning approvals. 7. As the road is un-adopted any damage to the road surface caused by demolition or construction traffic will almost inevitably fall to the Residents Committee (with our limited funds). We would therefore request that any housing developments are conditional upon the developers making good the road surface upon completion and to a standard acceptable to the Council’s highways department in consultation with ourselves. 8. We would further request that any new properties built in Egerton Park are made subject to a covenant that the owner or occupier must pay a service charge towards the upkeep of the road and infrastructure which is set annually at the AGM of the residents association (currently £5 per month). I reiterate that the residents and Committee of Egerton Park are fully supportive of a process of residential development of the derelict sites in Egerton Park and its surroundings. Indeed we have been campaigning for this for several years. However, this is an un-adopted, Victorian, enclosed “residential” estate in a suburb and, as such needs special consideration to ensure that any development is compatible with the current housing stock and is sustainable in the longer term.
DOR00986	<p>I am appalled at the scope of your plan which, if fulfilled would have a devastating effect on the borough. I am particularly concerned at your plan which includes the land currently owned by Prenton Golf Club. I trust this is a mistake but, assuming it is, reflects very badly on the quality of the work underpinning this plan.</p> <p>I trust this plan, in its current form, will be relegated to the only place it deserves to occupy - the rubbish bin.</p>
DOR00987	<p>I wish to make the following comments on the council’s Local Plan Development Options:</p> <ol style="list-style-type: none"> 1. Housing demand / allocations must be challenged - figures calculated by the Government’s calculation method are significantly higher than most informed projections 2. Housing densities used to calculate housing capacity of available sites and area of additional land required for development need to be challenged - we should not be developing at typical UK house builder estate densities of 20-30 dwellings per hectare. Good, well designed low rise housing developments designed by decent architects and planners can easily achieve 50-70 dwellings per hectare (comparable to the best New Towns in the 1950s and 60s). Developments that my practice is working on for more progressive developers regularly achieve these figures whilst creating vibrant places with a strong sense of community.

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	<p>3. For all development, and higher density developments in particular, design quality is key - recent development on the Wirral have not been good in this respect.</p> <p>4. What consideration has been given to a new, sustainable community (possibly in the Green Belt) along the lines of the Government's Garden Towns/Villages? This approach would concentrate and contain new development rather than placing additional burden on existing communities which don't have adequate infrastructure and are already over-reliant on private car use. Has the viability and benefits of such an approach been considered and if so what factors have ruled it out? Instead of infill developments and extension of existing settlements, a single sustainable development could take care of the full shortfall in housing numbers, with a large enough population to support a full range of facilities and services, including sustainable transport infrastructure.</p> <p>5. Could Clatterbridge and Arrowe Park hospitals be merged on to a single site to release brownfield land for development?</p> <p>6. Areas around Barnston and Heswall Hills should not be considered for development without substantial investment in Heswall rail station and regular direct train services to Liverpool.</p>
DOR00988	<p>"We responded, highlighting specifically the many supported reasons why development should not take place in the areas west of Wirral Way to the coastline. Development in this area would be expensive executive style private housing of a similar nature to that already being developed in Heswall. These are then sold at a great profit by developers to people who already have the means to purchase other available property in Heswall. There is no possibility of joining this area to another, without causing a catastrophic effect on the environment and most importantly there is no need for development in this area. The land west of Wirral Way is only included because it has been offered to the Council, The field behind our home in Seabank Road is up for sale, but to develop it would be a direct breach of Wirral Council's commitment to protect such areas, unless exceptional circumstances apply. There are no exceptional circumstances applicable to this area. Prime agricultural land is essential to the area. National guidelines and local UDP policies give protection on land west of the Wirral Way to the coast. The Council has a legal duty to protect land adjacent to the Dee Estuary SSSI/Ramsar site. The new plan needs to consider wildlife corridors, preservation of protected species, biodiversity, scientific and recreational benefit. Locally, we have offsite roosting, breeding and feeding of a range of wetland and sea birds. In terms of wildlife corridors, they are essential for the preservation of protected species such as badgers, birds of prey, voles, foxes, hedgehogs, harvest mice, curlews and shelducks, amongst others. To allow development of green belt without identifying exceptional circumstances, via another route such as infill villages would breach current planning law and would be outside the power of Wirral Council, as benefit is only afforded to the developer, and at the same time having a detrimental effect on the land, environment, wildlife and thousands of people who use this area for scientific investigation, health and leisure activities. Such development would have a devastating impact on the character, appearance, spatial and visual views of the area in addition to the impact on wildlife, the environment, International, European and National constraints. Once development is undertaken, there is no going back! The Principles for the Coastal Policy state ""preserving and enhancing the character of the coast, in particular, its ""</p> <p>"National and international importance for nature conservation... The parcel areas west of Wirral way are all located within the Coastal Zone. Furthermore, development will be permitted within the Developed Coastal Zone subject to the following criteria: the development requires a coastal location, unless the applicant can demonstrate that there is no alternative sites outside the Coastal Zone capable of accommodating the proposed development."" The policy also states that ""Protection of landscape quality particularly on the undeveloped coastline is thus of considerable importance. "Is the Council deserting such fundamental values?</p> <p>In considering proposals for development on agricultural land, the local planning authority will seek to prevent: The loss of Wirral's best and most versatile agricultural land the severance or fragmentation of a farm holding. In addition, the Government is now placing greater emphasis on preserving agricultural land and in particular regarding such a principle, post Brexit, as essential. It is far better to have locally produced foodstuffs, selling locally with the avoidance of transport affecting the environment, etc. It is difficult to assess the damage to the local infrastructure if development was allowed in the areas west of Wirral Way. There are only 2 ways out of Lower Heswall, up Station Road and Wittering Lane. Station Road is relatively narrow and comes to a blind corner when it meets Village Road. Increased traffic would not only have significant pollution implications, but could be a major accident area in waiting.</p> <p>"Coming down Station Road to the junction with Davenport and Riverbank, which at that point are part of Wirral Way, the public signs show illustrations of horses, pedestrians, cycles, etc., used by many such is the popularity of this part of the Wirral. It would be extremely dangerous, specifically at the almost 90 degree curve in the road by the entrance sign, as cars are forced to the wrong side of the road going towards the coast. Similarly, going up to Heswall many pedestrians and cyclists are on the road due to the narrow pathways now. Riverbank Road, within the fields, are still subject to flooding due to run off from Heswall. Additional housing would cause a significant worsening of this position. It is also understood that severe drainage problems arise in Seabank Road towards the coastline. Further down by Wittering Lane there are also areas of local flooding Locals in each area will be able to expand on their specific area, as indeed they will about other local issues. The figures of house builds and the urban and brownfield space available around Wirral would suggest that the Council have incorporated green belt land into their calculations already. How many vacant houses are there in Wirral that can be redeveloped into homes? The council should be planning and liaising with Peel Holdings and Wirral Waters to bring the new developments to Wirral.</p>

DOR REF	RESPONSE
DOR00989	<p>I would like to object to any proposed development of greenbelt land on Wirral peninsular for the following reasons.</p> <p>As we are surrounded on three sides by water the only countryside we have is a small strip about two miles wide in between Bebington and Heswall once this is gone there will be no countryside between Knowsley on the far side of Liverpool to North Wales.</p> <p>This will decimate our wildlife and turn Wirral into one large built up area with a loss of valuable countryside, with water on three sides there will be nowhere left, unlike many areas that are surrounded by fields and countryside.</p> <p>I think you should really think about this before making any decision on developing our greenbelt.</p>
DOR00990	<p>Current plan is clearly put together in haste due to the Council's failure to develop a well prepared objective plan through adequate consultation with its local residents who would be most affected by such plans indeed. Wirral Council are now compounding their lack of a 'Local Plan' with a rushed and flawed Review and Public Consultation. Their actions do not match their words about protecting our Green Belt on which the attraction and tourism of Wirral depend. On the contrary, the Council are still determined to release Green Belt for development even in the wake of much lower Growth Forecasts, from national and local sources.</p> <p>In addition sites SP058C, SP058D and SP058E are certainly not suitable for affordable housing which is what is needed on the Wirral. The sites in question are located in areas where there isn't adequate infrastructure. Therefore your proposal is simply not acceptable.</p> <p>We know that Wirral is not an area of high housing pressure. The high 'Housing Need' figure for Wirral, blamed by the Council on Government, was clearly based upon the Council's own inflated Growth assumptions and used to justify saying Wirral's 'Housing Need' could not be met without building on Green Belt. However, independent professional research had concluded even that former high figure was deliverable with NIL release of Green Belt. The new lower Growth Forecasts should make this easier to achieve which is the expressed wish of Residents like ourselves. Wirral has vast untapped amounts of buildings and land outside of Green Belt to supply sufficient housing of all types throughout the Local Plan Period and beyond.</p> <p>To start with, Peel Holdings have confirmed up to 6,450 units can be delivered at 'Wirral Waters'. Yet, despite Officers confirming Phase One is "fully viable" due in part to a £6m Government Grant and New Homes monies, the Council have not included a single new dwelling in its First or even Second 5-Year Period and just 1,100 homes after 15 years, why?</p> <p>There are also thousands of Brownfield Sites and approved schemes, 16,000 existing planning consents and up to 6,000 empty houses to be brought back into use, plus opportunities for significant conversions, normal applications and 'Windfall' supply and more. Sadly, little is being made of much, whilst Officers appear happy to state that developers and the Council see greenfield development as simple, quick and lucrative.</p> <p>Not only I am opposing to the probable, completely unnecessary loss of Green Belt land but also the lack of time being afforded the public to engage properly in the process of deciding what is really needed and where in and around our communities development is best located having due regard to all factors including support infrastructure and already stretched public services and facilities.</p> <p>As a local Wirral resident, I am asking you to cancel all plans to open the green belt for development and involve willing residents to deliver a more robust Local Plan based in a shorter overall time and based on current and accurate figures. The administrations owe it not only to the current local residents but to the next generations as well.</p>
DOR00991	<p>I wish to lodge my objections to using green belt land for housing.</p> <p>Whatever objections the council receive the council will not listen or change direction on their plans, so really it's a waste of my time writing this objection. I am just a tax payer and contribute to the pot every year, but my objection will be over ridden in favour of the council making lots money on the green belt land. This Government is a joke. I did not vote for the conservatives. Not in my name.</p> <p>The Wirral council just don't care about green belt land they just want to make money.</p>
DOR00992	<p>I write as a very concerned Wirral resident. I am completely opposed to Wirral Borough Council's proposal to build on Greenbelt sites when there are plenty of Brownfield sites available. My opposition is based on the wholly unnecessary proposed destruction of these irreplaceable natural assets which are the heritage of generations yet to come. I strongly advocate that we have a duty to protect our green and open space for the future. Recently I took part in a lobby, alongside many other concerned residents, at the town hall in Wallasey to object to the loss of any green spaces.</p> <p>We were told that Wirral Borough Council needed to build 12,000 homes according to government projections for housing on Wirral. However in their own Compendium of Statistics WBC say that the population of Wirral is going to either stay static or fall by 2.95% by 2030. This is in direct contradiction to the housing figures used in the consultation. The Office of National Statistics has since reviewed their original figures for Wirral and the amount of housing needed has now been halved. As inaccurate figures were used during the public consultations, the consultation should now be scrapped and started again using the actual up to date figures. There are enough brownfield sites available to build affordable housing in areas where it is most needed and these sites should be maximised. There are also between 2000 and 6000 empty properties which should be brought back into use as a matter of urgency. Wirral Borough Council should concentrate on building affordable housing on brownfield sites in the areas of greatest need and on the rejuvenation of areas such as Birkenhead, Tranmere, Rock Ferry and New Ferry, which are some of the most deprived in the country. I ask that you, as local councillors, make representation on my behalf and strongly express my concerns.</p>

DOR REF	RESPONSE
DOR00993	<p>I do not accept that the council has taken proper steps and followed due process to avoid relaxing development of Green Belt Land and call on Wirral Council to drop any proposals to release Green Belt for development, as there is clearly enough brownfield land and refurbished housing to meet the “theoretical housing need” for the borough. This is based on:</p> <ul style="list-style-type: none"> • The current WBC figures are an overestimation of need for housing within the borough, the revised ONS figures are forecasting a much-reduced population for Wirral borough by 2035, in line with but still above the historic trend • Using figures from ‘Wirral Compendium of Statistics 2017’ a WBC document, it is anticipated that the population of Wirral will continue to fall by 6544 by 2030. • Poor and flawed analysis of brownfield sites (WBC data is incorrect and incomplete), refurbishment/conversion opportunities, unfulfilled planning consents and empty properties within the borough • It is not appropriate as per the planning guidance (NPPF) to destroy farmland when there are brown field sites and empty houses available • Flawed projection of housing needs – council have gone to consultation and only now is validation of the numbers being verified by the appointment of a consultant statistician – does this not invalidate the whole consultation process? • Type of property which would be built on proposed Green Belt sites would not be the type of social/affordable housing which needs to be built to address the housing • shortage needs of Wirral Borough residents • There is no link between releasing Green Belt land and achieving the recognised need for affordable housing. There are only greater rewards for both building developers and WBC if large houses are built • WBC state they wish to develop the tourism industry as a key industry for the area, but by reducing one of the main attractions of the area “the openness and green spaces of the Wirral” from 46% to 32% , this will have a negative impact on the area and the industry. • Use of Infill villages in Conservation Areas – Frankby As a resident of Frankby Conservation Area, I also do not accept WBC suggesting that ‘limited Infill development’ could also be allowed within defined areas of the village, despite there not actually being any site that could be developed without impact upon the character and appearance of the Conservation Area. <ul style="list-style-type: none"> • That Infill development within the Conservation Area would relate to new build housing runs entirely contrary to conservation principles and amounts to incorrect process. [A council representative at the WBC meeting at West Kirby Concourse on 18th September was clear that infill relates to ‘new build’ housing only and was adamant that WBC was not interested in and would not be prepared to include in housing figures the conversion or development of any pre-existing buildings]. • There is no housing need within Frankby. • There are no local shops or amenities to support an increase in residential properties. • There is a legal duty upon WBC to pay special attention to preserving or enhancing designated Conservation Areas with heritage assets having been identified for specific protection in national policy (NPPF, para 184). • Wirral Landscape and Character Assessment places the area in which Frankby sits in the highest category of ‘good’ with an overall landscape category of ‘conserve’, with an emphasis on managing its key features. The importance of trees and hedgerows within the village are noted to soften and integrate properties within the surrounding landscape. In summary the current proposals from WBC do not meet the needs or priorities of the people they represent. WBC has not fully examined all other reasonable options for meeting the need for development and therefore cannot satisfy the test that exceptional circumstances exist such as to justify changes to the Green belt boundaries required by paragraph 137 NPPF.
DOR00994	<p>Please explain why the local plan has neither been dropped or revised in light of the recent news that Government housing needs calculations have been proved and admitted to have been incorrect and excessive.</p>
DOR00995	<p>I went on your website yesterday, but was none the wiser, as all you show are fields intended for development, and no plans.</p> <p>However, I would like to register my objection to the local plan as made available.</p> <p>As Wirral Borough Council says , or at least the politicians , we will probably need 50% or less new houses on Wirral in the foreseeable future , and that does not take the possible negative effects of Brexit into account .</p> <p>Yet again Party dogma takes precedence over reality, Government attitudes on the one hand, and Council overreaction to them on the other.</p> <p>A realistic solution could be smaller scale housing developments at the fringes of developed areas, with proper infrastructure.</p> <p>For example, medical access, recreation areas and shops. There must be enough brownfield land to carry that out, preserving all existing greenbelt areas?</p> <p>I do not want Wirral to become one big concrete conurbation, all houses and no green spaces.</p> <p>Unless Party politics is taken out of this issue fast, I forecast concrete cows instead of real ones on our once green and pleasant peninsula!</p>
DOR00996	[SAME AS DOR01052]

DOR REF	RESPONSE
DOR00997	I demand the Government acknowledge the new housing projections from the Office of National Statistics and reduce the housing target for Wirral to reflect local needs which are far more important than keeping your Conservative manifesto pledge. The Wirral peninsula is a lovely place to live and its roads and public services just about cope with its growing population now. Westminster should leave governing to the Wirral to its own knowledge and requirements and leave green belt alone.
DOR00998	I wish to register my opposition to the proposed "mixed use" development of land at Bromborough Civic Centre and Allport Lane Car Park. Apart from the obvious impact on Bromborough village and the local residents of removing this car park, which has already been pointed out in various quarters, extra housing development here would further extend the urban sprawl which is creeping further into every last open space in the Bromborough ward, and which you claim to be keen to protect. The Allport Road car park is quite often full in the daytime. Where are these drivers, who are presumably staff and customers of the village, going to park? The small shops and cafes will lose out to M&S, Costa etc. down the road at the Croft Retail Park, which is already choked with traffic anyway. So much for employment opportunities for the local people - and so much for a Labour philosophy. Surely the proposal for two hundred new homes on Acre Lane, just around the corner, is enough for one area to cope with in terms of added traffic, school places, etc. Redeveloping the Acre Lane wasteland is one thing, but why deprive everyone of a well-used car park and the local Civic Centre as well? Are people just to stay at home all day? - Or more likely, drive everywhere. Why not use the money of ours that you lend to other councils and come up with an idea to revitalise the Civic Centre instead? For example, a youth centre such as The Hive in Birkenhead, which appears to have been successful.
DOR00999	The site to which these representations relate is land to the south of Croft Retail Park, Caldbeck Road, Bromborough. The site is also referred to within planning policy documents as the former Spectrum Adhesives site (Council reference ELPS 234). process of acquiring the vacant land which lies to the south of Croft Retail Park from Homes England. Are currently in the process of undertaking pre-application discussions with Wirral Council Planning Department with regard to the redevelopment of the site for mixed use development comprising the following uses: A1, A1/A3, A3/A5, A4, C1, B1, B2 and B8. Proposed Amendments to the Emerging Policy - For a site to be allocated for a particular use, the Council need to be able to demonstrate that it is deliverable in full or in part within the plan period. Despite the allocation in the adopted plan, for in excess of 18 years, the site has not come forward to employment use. The viability assessment by the Council has set out the negative yield on the various different types of 'B' uses. Furthermore, prior to Redsun being selected as preferred bidder status, it is our understanding that the site had been on the market for 3 years and the only tentative interest in the site was for uses that would not comply with the employment policy (non-employment uses). It is therefore considered that it is wholly inappropriate to allocate the site for a retained employment use and instead consider a mixed-use allocation. Part of the site assessment notes that, 'Alternatively, other higher value commercial uses and Sui Generis uses would improve the viability of delivering the site.' The site will only be deliverable for employment uses in part if they are supported by other uses. Whilst the Council have undertaken their own assessment which sets out a negative return for an entirely employment development, Redsun would be happy to provide an open book approach on their development appraisal to confirm and demonstrate this. It is recommended that the allocation is amended and included as a mixed-use allocation to facilitate the uses prescribed within this correspondence so that the site can come forward and delivered within the plan period.
DOR01000	Wirral is currently an exceptional place to live due in large part to the diversity of its landscape and the ease in which both brown and green belt can be accessed. The local plan outlines a range of areas in which building could be initiated that will limit the availability of open spaces, reduce the diversity of the area and reduce the volume of agricultural land available to support and sustain our local economy. We are striving nationally to address health challenges associated with obesity and diabetes - the solutions for both are an improved diet and increased exercise. The removal of agricultural and green belt land directly opposes this and will create yet more health issues as we move into this century. Economically the area benefits from the diversity that we have - if we turn the peninsula into a bounded housing estate these will be lost and it will no longer be an attractive place to live negating the improvements seen over the last few years. Brown field sites abound and should be prioritised - owners who are holding off making them available until the economic conditions favour them should not be tolerated - there are plenty of formal routes that can be used to move things forward - these should be used before we lose more of our diversity and open space