

Person ID	ID	Question 2.16 - Do you agree with the classification of sites set out within the 2019 Green Belt Review?	Site number / Reference:	Question 2.16b - Suggested alternative classification (please select):	Question 2.16c - Please give your reasons below. (If you don't agree with the Green Belt Review Methodology you can comment in the separate evidence consultation)	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6
1245044	LPIO-10007	no			The Initial Review of Green Belt in September 2018 as part of the Development Options Review consultation considered both defined land parcels and SHLAA sites. However, the Planning Officers Society peer review made a number of recommendations in relation to the methodology. An inconsistent approach to classifying the level of site containment or enclosure, and that there was flaws in the way the strength of existing boundaries had been judged. Furthermore, the 'experience' of separation, in both landscape and visual separation terms should have been undertaken. Information to define historic towns could be drawn from the Merseyside Historic Characterisation Project, Wirral Report 2011 and the Cheshire Historic Characterisation 2007 and the Wirral Landscape Character Assessment. The method for reviewing Green Belt Parcels is not robust and classification of parcels as "weakly performing" etc is flawed and will be open to challenge. There are too many studies and assessments which have yet to be completed which makes the whole process flawed. By increasing the use of brownfield, having appropriate density of development and by improved coordination with neighbours, NPPF Section 11 Making more effective use of land is more likely to be complied with and the need to release any Green Belt land is eradicated, certainly the case there is an exceptional circumstance is eroded.						
1246747	LPIO-10039	no			No Greenbelt land should be built on. Classification should not be a factor, because it's ALL precious, and should ALL be preserved.						
1246760	LPIO-10092	no			I do not accept the premise that some Green Belt land and settlements are "Weakly Performing". They are more important now than ever before in addressing the five purposes that they were set up for. The whole classification process is subjective and unreliable. It's funny how the sites that are classed as making the least contribution also happen to be the prime development sites with developers and landowners keen to put them forward for housing. I disagree strongly with the classification of the Green Belt sites that I am familiar with near where I live and will comment on them separately. The only "exceptional" circumstances that I can see associated with the potential release of Green Belt is the vastly exaggerated and unjustifiable figure of 12,000 homes that the Council claims are needed. If this figure is reduced to something more realistic then there will be no need to build any of the 2,500 homes that the Council claims may be required on Green Belt. It also contravenes a motion passed by the Council in October 2019 that agricultural land should not be included in any SHLAA and must be kept as agricultural land. The Council bangs on about protecting our environment and heritage. More recently, guarding against climate change has emerged as another key headline amongst the Council's key objectives. Trees and plants absorb carbon dioxide; houses don't. We can't afford to sacrifice Green Belt just to allow developers and land owners to get rich.						
1246792	LPIO-1012	no		Weak	Area on Thingwall Road that is currently Yew Tree Riding Stables is not for development. Ownership has changed hands and money has been invested in stables and paddocks.						
1241319	LPIO-10150	yes			I believe all Wirral Green Belt should remain protected and should not be built on. The justification for this is the land is the reason why most of the residents local to the land chose to live there. There is no need currently for the Green Belt to be disturbed when there are so many areas on the Wirral that need investment and regeneration.						
1244412	LPIO-1017	no			I don't agree with the classification of weakly performing parcels or settlements. Agricultural land should be kept as such for; combating climate change and for maintaining food supplies post BREXIT. My understanding is that the council passed a motion in October 2019 to the effect that Agricultural Land should not be included in any SHLAA.						
1241065	LPIO-10199	no		Weak	Green belt review should include how close a site is to public transport infrastructure.						
1246743	LPIO-10202	yes									
1246559 Cheshire Wildlife Trust	LPIO-10210				The green belt appraisal is limited in scope to green belt functionality and consequently the review of land parcels completely fails to encompass the environmental objective of the NPPF (objective c) by not giving it the prominence it should within the appraisal. Because we disagree with the assessment methodology for potential development sites/parcels it is self-evident that the classification of sites will be flawed. Information on statutory and non-statutory sites and ecological networks should be considered in parallel with the green belt review and carry equal weight in the final decision process (or greater weight for statutory sites). Guidance for this is explicitly set out in paragraph 171 of the NPPF that "Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework" Furthermore as set out in paragraph 174 of the NPPF "To protect and enhance biodiversity and geodiversity, plans should: Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation" There is little or no reference to this crucial policy guidance in the green belt review. This is unacceptable (see NPPF paragraph 170a - protecting and enhancing valued landscapes, sites of biodiversity ... in a manner commensurate with their statutory status or identified quality in the development plan) Of the sites suggested for GB release, 3 have major wildlife objections and 5 have wildlife concerns. For "weakly-performing Greenbelt" out of 33 sites there are serious objections on wildlife grounds to 14 and concerns for another 7.	<a href="https://wirral-consult.objective.co.uk/file/566826">https://wirral-consult.objective.co.uk/file/566826</a>					
1246731	LPIO-10215	no			The Council's consultants methodology is correct, but they fail to implement it in accordance with their own criteria, for example: "A desk-based analysis will be applied in the first instance using Ordnance Survey maps, with site visits used as a sense check in order to confirm these boundaries. Only existing boundaries will be used", yet they have failed to consider resulting in "... [this results] in large expanses of countryside which are not akin to 'parcels'; less durable features will be utilised in order to enable division of the Green Belt into manageable parcels." In the case of a part of Parcel 7.26 this has led to a section of land which otherwise met the Key Questions to Consider: 3. Spatial connection to built up area: a. Is the parcel well connected to the built up area along a number of boundaries? b. Would development of the parcel help 'round off' the built up area, taking into account the historic context of the Green Belt?	<a href="https://wirral-consult.objective.co.uk/file/563332">https://wirral-consult.objective.co.uk/file/563332</a>					



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1246808	LPIO-10743	no	All greenbelt area	High	No greenbelt should be used! Brownfield and regeneration first						
1243890	LPIO-1087	no									
1247196	LPIO-11564	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1242183	LPIO-11705				It is the Green Belt that helps make Wirral so attractive and interesting by separating distinct residential towns and villages and allowing easy access to the countryside for residents and visitors. Added to this, the Council has also recognised that we have a 'Climate Emergency' and is committed to taking measures to address this situation. A Council Motion was passed unanimously stating that NO productive agricultural land will be released for development. The Local Plan Options fail to adhere to this commitment.						
1247015	LPIO-11762 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement. This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification.						
1247015	LPIO-11762 2 of 2				Finally, in their assessment of some Green Belt Areas e.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1240731	LPIO-1187	no			This document gives the impression that all non shortlisted Green Belt sites are safe therefore discourages widespread involvement in the consultation process. This question is divisive. It sets one community against another as each will be defending their own area of Green Belt. Communities with the largest and most effective action groups will have the biggest say in defending their own local area. The council itself has a duty to show that exceptional circumstances prevail before any change of Green Belt boundaries are considered. Production of a Local Plan alone does not constitute exceptional circumstances. At a full council meeting on 15/10/2018 Motion 55 (1) was passed unanimously. This 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".						
1244681	LPIO-1221	no			Particular concern is the development of prime agricultural farmland and important natural habitats. Agricultural land must be kept as such. Wirral Borough Council passed a motion to the effect that Agricultural land should not be included in any SHLAA.						
1247214	LPIO-12391	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1247492	LPIO-12488	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1240843	LPIO-12654	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1241412	LPIO-127	yes		Weak	No green area should be used for building housing or other developments unless there is no alternative and with a proper consultation. No homes should be built that are not affordable for normal working people to buy/rent and no brown envelopes should be exchanged for granting planning permission.						

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1247578	LPIO-12852	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1247510	LPIO-12976	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1247311	LPIO-13070				Your Consultation Document claims that the Green Belt land in Option 2b is 'weakly performing'. I would challenge that and argue that it meets all 5 purposes of the Green Belt and to say that Option 2b would have 'minor negative effects' on transport shows a lack of local knowledge. Is this because your consultants were not local and worked from maps rather than visiting the area to see for themselves?						
1246335	LPIO-13100	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1247444	LPIO-13230		6.15 (SP013)		I am very keen to protect and enhance the unique character and visual amenities of the Caldý Conservation Area . Sadly, the emerging Local Plan will not do so. As a local resident, I have particular concerns regarding the Wirral Green Belt Review 2019, its methodology and parcel assessments, in particular in relation to Parcel 6.15, being the land to the west of Column Road Caldý. Any development of Parcel 6.15 will destroy the character of the local area and will detrimentally impact upon the visual and other amenities of the adjacent Caldý Conservation Area. The current Green Belt designation of Parcel 6.15 protects the setting and special character of Caldý village which residents wish to see retained. The National Planning Policy Framework (NPPF) clearly identifies the important role played by the Green Belt and specifically stipulates that Green Belt boundaries should only be altered where exceptional circumstances exist and are fully evidenced and justified. The Council has failed to make the case for such exceptional circumstances in relation to Parcel 6.15, and many other Green Belt sites.						
1247672	LPIO-13237				I object to the green belt review and methodology for selection of this site for example the boundary on the plan has been deliberately drawn to try to rate the land as highly enclosed when in fact the true development boundary is east of Stapleton Woods and the development site is not highly enclosed. Furthermore I object to the council's assessment rating of the five purposes of the greenbelt land should sere in accordance with the NNPF criteria. (in particular purposes 1, 2,3 and 5 below) Objections to the green belt review methodology: 1. Prevention of urban sprawl. Site 6.15 makes a strong contribution to preventing urban sprawl i.e. the joining of the two settlements of Caldý and West Kirby. 2. Merging of Towns. This land parcel forms an open space between West Kirby and the Caldý Conservation Area and its development would bridge and merge these settlements. 3. Encroachment. This parcel of land prevents encroachment of the low density development on the edge of the West Kirby and Caldý boundaries with open countryside to the East of Column Road and strongly contributes to the rural corridor either side of Telegraph Road. 4. Urban Regeneration (purpose 5) releasing green belt detracts from focusing on much needed development in existing derelict and deprived urban areas. Saving of agricultural land. This plot of versatile agricultural land currently supports the growing of crops and animal husbandry and should be preserved and maintained for future generations to mitigate the impact of climate change and future food shortages as world population increase.						
1247676	LPIO-13246				I object to the green belt review and methodology for selection of this site for example the boundary on the plan has been deliberately drawn to try to rate the land as highly enclosed when in fact the true development boundary is east of Stapleton Woods and the development site is not highly enclosed. Furthermore I object to the council's assessment rating of the five purposes of the greenbelt land should sere in accordance with the NNPF criteria. (in particular purposes 1, 2,3 and 5 below) Objections to the green belt review methodology: 1. Prevention of urban sprawl. Site 6.15 makes a strong contribution to preventing urban sprawl i.e. the joining of the two settlements of Caldý and West Kirby. 2. Merging of Towns. This land parcel forms an open space between West Kirby and the Caldý Conservation Area and its development would bridge and merge these settlements. 3. Encroachment. This parcel of land prevents encroachment of the low density development on the edge of the West Kirby and Caldý boundaries with open countryside to the East of Column Road and strongly contributes to the rural corridor either side of Telegraph Road. 4. Urban Regeneration (purpose 5) releasing green belt detracts from focusing on much needed development in existing derelict and deprived urban areas. Saving of agricultural land. This plot of versatile agricultural land currently supports the growing of crops and animal husbandry and should be preserved and maintained for future generations to mitigate the impact of climate change and future food shortages as world population increase.						

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1246450	LPIO-13255				<p>I object to the green belt review and methodology for selection of this site for example the boundary on the plan has been deliberately drawn to try to rate the land as highly enclosed when in fact the true development boundary is east of Stapleton Woods and the development site is not highly enclosed. Furthermore I object to the council's assessment rating of the five purposes of the greenbelt land should sere in accordance with the NNPF criteria. (in particular purposes 1, 2,3 and 5 below) Objections to the green belt review methodology:</p> <ol style="list-style-type: none"> <li>1. Prevention of urban sprawl. Site 6.15 makes a strong contribution to preventing urban sprawl i.e. the joining of the two settlements of Caldý and West Kirby.</li> <li>2. Merging of Towns. This land parcel forms an open space between West Kirby and the Caldý Conservation Area and its development would bridge and merge these settlements.</li> <li>3. Encroachment. This parcel of land prevents encroachment of the low density development on the edge of the West Kirby and Caldý boundaries with open countryside to the East of Column Road and strongly contributes to the rural corridor either side of Telegraph Road.</li> <li>4. Urban Regeneration (purpose 5) releasing green belt detracts from focusing on much needed development in existing derelict and deprived urban areas. Saving of agricultural land. This plot of versatile agricultural land currently supports the growing of crops and animal husbandry and should be preserved and maintained for future generations to mitigate the impact of climate change and future food shortages as world population increase.</li> </ol>						
1245587	LPIO-13275 1 of 2		Parcel 2.16 Caldý Conservation Area		<p>I am very keen to protect and enhance the unique character and visual amenities of the Caldý Conservation Area. Sadly, the emerging Local Plan will not do so. As a local resident, I have particular concerns regarding the Wirral Green Belt Review 2019, its methodology and parcel assessments, in particular in relation to Parcel 6.15, being the land to the west of Column Road Caldý. Any development of Parcel 6.15 will destroy the character of the local area and will detrimentally impact upon the visual and other amenities of the adjacent Caldý Conservation Area. The current Green Belt designation of Parcel 6.15 protects the setting and special character of Caldý village which residents wish to see retained. The National Planning Policy Framework ("NPPF") clearly identifies the important role played by the Green Belt and specifically stipulates that Green Belt boundaries should only be altered where exceptional circumstances exist and are fully evidenced and justified. The Council has failed to make the case for such exceptional circumstances in relation to Parcel 6.15, and many other Green Belt sites. Accordingly, I respond to the Issues and Option Consultation as follows: 1. I object to the Green Belt Review and the methodology for the selection of sites and, in particular, the assessment relating to Parcel 6.15; I am very keen to protect and enhance the unique character and visual amenities of the Caldý Conservation Area. Sadly, the emerging Local Plan will not do so. As a local resident, I have particular concerns regarding the Wirral Green Belt Review 2019, its methodology and parcel assessments, in particular in relation to Parcel 6.15, being the land to the west of Column Road Caldý. Any development of Parcel 6.15 will destroy the character of the local area and will detrimentally impact upon the visual and other amenities of the adjacent Caldý Conservation Area. The current Green Belt designation of Parcel 6.15 protects the setting and special character of Caldý village which residents wish to see retained. The National Planning Policy Framework ("NPPF") clearly identifies the important role played by the Green Belt and specifically stipulates that Green Belt boundaries should only be altered where exceptional circumstances exist and are fully evidenced and justified.</p>						
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1245609	LPIO-13288 1 of 2		Parcel 2.16 Caldý Conservation Area		<p>I am very keen to protect and enhance the unique character and visual amenities of the Caldý Conservation Area. Sadly, the emerging Local Plan will not do so. As a local resident, I have particular concerns regarding the Wirral Green Belt Review 2019, its methodology and parcel assessments, in particular in relation to Parcel 6.15, being the land to the west of Column Road Caldý. Any development of Parcel 6.15 will destroy the character of the local area and will detrimentally impact upon the visual and other amenities of the adjacent Caldý Conservation Area. The current Green Belt designation of Parcel 6.15 protects the setting and special character of Caldý village which residents wish to see retained. The National Planning Policy Framework ("NPPF") clearly identifies the important role played by the Green Belt and specifically stipulates that Green Belt boundaries should only be altered where exceptional circumstances exist and are fully evidenced and justified. The Council has failed to make the case for such exceptional circumstances in relation to Parcel 6.15, and many other Green Belt sites. Accordingly, I respond to the Issues and Option Consultation as follows: 1. I object to the Green Belt Review and the methodology for the selection of sites and, in particular, the assessment relating to Parcel 6.15; I am very keen to protect and enhance the unique character and visual amenities of the Caldý Conservation Area. Sadly, the emerging Local Plan will not do so. As a local resident, I have particular concerns regarding the Wirral Green Belt Review 2019, its methodology and parcel assessments, in particular in relation to Parcel 6.15, being the land to the west of Column Road Caldý. Any development of Parcel 6.15 will destroy the character of the local area and will detrimentally impact upon the visual and other amenities of the adjacent Caldý Conservation Area. The current Green Belt designation of Parcel 6.15 protects the setting and special character of Caldý village which residents wish to see retained. The National Planning Policy Framework ("NPPF") clearly identifies the important role played by the Green Belt and specifically stipulates that Green Belt boundaries should only be altered where exceptional circumstances exist and are fully evidenced and justified.</p>						

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1247682	LPIO-13291 1 of 2		Parcel 2.16 Caldy Conservation Area		I am very keen to protect and enhance the unique character and visual amenities of the Cald y Conservation Area. Sadly, the emerging Local Plan will not do so. As a local resident, I have particular concerns regarding the Wirral Green Belt Review 2019, its methodology and parcel assessments, in particular in relation to Parcel 6.15, being the land to the west of Column Road Cald y. Any development of Parcel 6.15 will destroy the character of the local area and will detrimentally impact upon the visual and other amenities of the adjacent Cald y Conservation Area. The current Green Belt designation of Parcel 6.15 protects the setting and special character of Cald y village which residents wish to see retained. The National Planning Policy Framework ("NPPF") clearly identifies the important role played by the Green Belt and specifically stipulates that Green Belt boundaries should only be altered where exceptional circumstances exist and are fully evidenced and justified. The Council has failed to make the case for such exceptional circumstances in relation to Parcel 6.15, and many other Green Belt sites. Accordingly, I respond to the Issues and Option Consultation as follows: 1. I object to the Green Belt Review and the methodology for the selection of sites and, in particular, the assessment relating to Parcel 6.15; I am very keen to protect and enhance the unique character and visual amenities of the Cald y Conservation Area. Sadly, the emerging Local Plan will not do so. As a local resident, I have particular concerns regarding the Wirral Green Belt Review 2019, its methodology and parcel assessments, in particular in relation to Parcel 6.15, being the land to the west of Column Road Cald y. Any development of Parcel 6.15 will destroy the character of the local area and will detrimentally impact upon the visual and other amenities of the adjacent Cald y Conservation Area. The current Green Belt designation of Parcel 6.15 protects the setting and special character of Cald y village which residents wish to see retained. The National Planning Policy Framework ("NPPF") clearly identifies the important role played by the Green Belt and specifically stipulates that Green Belt boundaries should only be altered where exceptional circumstances exist and are fully evidenced and justified.							
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Person ID	ID	Question 2.16 - Do you agree with the classification of sites set out within the 2019 Green Belt Review?	Site number / Reference:	Question 2.16b - Suggested alternative classification (please select):	Question 2.16c - Please give your reasons below. (If you don't agree with the Green Belt Review Methodology you can comment in the separate evidence consultation)	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6
1247683	LPIO-13293 1 of 2		Parcel 2.16 Caldy Conservation Area		I am very keen to protect and enhance the unique character and visual amenities of the Caldyc Conservation Area . Sadly, the emerging Local Plan will not do so. As a local resident, I have particular concerns regarding the Wirral Green Belt Review 2019. its methodology and parcel assessments. in particular in relation to Parcel 6.15, being the land to the west of Column Road Caldyc. Any development of Parcel 6.15 will destroy the character of the local area and will detrimentally impact upon the visual and other amenities of the adjacent Caldyc Conservation Area. The current Green Belt designation of Parcel 6.15 protects the setting and special character of Caldyc village which residents wish to see retained. The National Planning Policy Framework ("NPPF") clearly identifies the important role played by the Green Belt and specifically stipulates that Green Belt boundaries should only be altered where exceptional circumstances exist and are fully evidenced and justified. Accordingly, I respond to the Issues and Option Consultation as follows: 1. I object to the Green Belt Review and the methodology for the selection of sites and, in particular, the assessment relating to Parcel 6.15; I am very keen to protect and enhance the unique character and visual amenities of the Caldyc Conservation Area. Sadly, the emerging Local Plan will not do so. As a local resident, I have particular concerns regarding the Wirral Green Belt Review 2019, its methodology and parcel assessments, in particular in relation to Parcel 6.15, being the land to the west of Column Road Caldyc. Any development of Parcel 6.15 will destroy the character of the local area and will detrimentally impact upon the visual and other amenities of the adjacent Caldyc Conservation Area. The current Green Belt designation of Parcel 6.15 protects the setting and special character of Caldyc village which residents wish to see retained. The National Planning Policy Framework ("NPPF") clearly identifies the important role played by the Green Belt and specifically stipulates that Green Belt boundaries should only be altered where exceptional circumstances exist and are fully evidenced and justified.						
1247683	LPIO-13293 2 of 2		Parcel 2.16 Caldy Conservation Area		The Council has failed to make the case for such exceptional circumstances in relation to Parcel 6.15, and many other Green Belt sites. Accordingly, I respond to the Issues and Option Consultation as follows: 1. I object to the Green Belt Review and the methodology for the selection of sites and, in particular, the assessment relating to Parcel 6.15; 1.1. According to the NPPF, the Green Belt serves 7ve purposes. Contrary to the assessment in the Green Belt Review, Parcel 6.15 makes a strong contribution to purposes 1, 2, 3 and 5. 1.2. The development of the site would result in the visual and physical coalescence of two settlements, namely Caldyc and West Kirby and will in effect, create a new sprawl or urban area stretching, virtually unbroken, from Caldyc, through West Kirby and Hoylake, to Meols. Parcel 6.15 makes a strong contribution to checking the unrestricted sprawl of urban areas. 1.3. It is evident that Parcel 6.15 forms a key open space separating Caldyc Village and West Kirby. Parcel 6.15 makes a strong contribution in preventing neighbouring townships from merging. 1.4. Parcel 6.15 makes a strong contribution towards safeguarding the countryside from encroachment. It performs a very important role in the transition from the low density development on the eastern edge of Caldyc village to the open countryside to the east of Column Road. 1.5. Parcel 6.15 makes a strong contribution towards encouraging the recycling and regeneration of derelict and urban land elsewhere in the borough. This is because the Parcel is an open green field site which performs strongly as a green belt site. 2. The Council has failed to have proper regard for the impact of any development of Parcel 6.15 upon the Caldyc Conservation Area, a heritage asset, which is directly adjacent to Parcel 6.15. Any development of Parcel 6.15 will have a detrimental impact on the conservation area and will forever change the character of the approaches to the village.						
1247684	LPIO-13295 1 of 2		Parcel 2.16 Caldy Conservation Area		I am very keen to protect and enhance the unique character and visual amenities of the Caldyc Conservation Area . Sadly, the emerging Local Plan will not do so. As a local resident, I have particular concerns regarding the Wirral Green Belt Review 2019. its methodology and parcel assessments. in particular in relation to Parcel 6.15, being the land to the west of Column Road Caldyc. Any development of Parcel 6.15 will destroy the character of the local area and will detrimentally impact upon the visual and other amenities of the adjacent Caldyc Conservation Area. The current Green Belt designation of Parcel 6.15 protects the setting and special character of Caldyc village which residents wish to see retained. The National Planning Policy Framework ("NPPF") clearly identifies the important role played by the Green Belt and specifically stipulates that Green Belt boundaries should only be altered where exceptional circumstances exist and are fully evidenced and justified. Accordingly, I respond to the Issues and Option Consultation as follows: 1. I object to the Green Belt Review and the methodology for the selection of sites and, in particular, the assessment relating to Parcel 6.15; I am very keen to protect and enhance the unique character and visual amenities of the Caldyc Conservation Area. Sadly, the emerging Local Plan will not do so. As a local resident, I have particular concerns regarding the Wirral Green Belt Review 2019, its methodology and parcel assessments, in particular in relation to Parcel 6.15, being the land to the west of Column Road Caldyc. Any development of Parcel 6.15 will destroy the character of the local area and will detrimentally impact upon the visual and other amenities of the adjacent Caldyc Conservation Area. The current Green Belt designation of Parcel 6.15 protects the setting and special character of Caldyc village which residents wish to see retained. The National Planning Policy Framework ("NPPF") clearly identifies the important role played by the Green Belt and specifically stipulates that Green Belt boundaries should only be altered where exceptional circumstances exist and are fully evidenced and justified.						

Person ID	ID	Question 2.16 - Do you agree with the classification of sites set out within the 2019 Green Belt Review?	Site number / Reference:	Question 2.16b - Suggested alternative classification (please select):	Question 2.16c - Please give your reasons below. (If you don't agree with the Green Belt Review Methodology you can comment in the separate evidence consultation)	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6	
1247684	LPIO-13295 2 of 2		Parcel 2.16 Caldy Conservation Area		The Council has failed to make the case for such exceptional circumstances in relation to Parcel 6.15, and many other Green Belt sites. Accordingly, I respond to the Issues and Option Consultation as follows: 1. I object to the Green Belt Review and the methodology for the selection of sites and, in particular, the assessment relating to Parcel 6.15; 1.1. According to the NPPF, the Green Belt serves 7ve purposes. Contrary to the assessment in the Green Belt Review, Parcel 6.15 makes a strong contribution to purposes 1, 2, 3 and 5. 1.2. The development of the site would result in the visual and physical coalescence of two settlements, namely Cald y and West Kirby and will in effect, create a new sprawl or urban area stretching, virtually unbroken, from Cald y, through West Kirby and Ho ylake, to Meols. Parcel 6.15 makes a strong contribution to checking the unrestricted sprawl of urban areas. 1.3. It is evident that Parcel 6.15 forms a key open space separating Cald y Village and West Kirby. Parcel 6.15 makes a strong contribution in preventing neighbouring townships from merging. 1.4. Parcel 6.15 makes a strong contribution towards safeguarding the countryside from encroachment. It performs a very important role in the transition from the low density development on the eastern edge of Cald y village to the open countryside to the east of Column Road. 1.5. Parcel 6.15 makes a strong contribution towards encouraging the recycling and regeneration of derelict and urban land elsewhere in the borough. This is because the Parcel is an open green field site which performs strongly as a green belt site. 2. The Council has failed to have proper regard for the impact of any development of Parcel 6.15 upon the Cald y Conservation Area, a heritage asset, which is directly adjacent to Parcel 6.15. Any development of Parcel 6.15 will have a detrimental impact on the conservation area and will forever change the character of the approaches to the village.							
1247685	LPIO-13297 1 of 2		Parcel 2.16 Caldy Conservation Area		I am very keen to protect and enhance the unique character and visual amenities of the Cald y Conservation Area . Sadly, the emerging Local Plan will not do so. As a local resident, I have particular concerns regarding the Wirral Green Belt Review 2019, its methodology and parcel assessments, in particular in relation to Parcel 6.15, being the land to the west of Column Road Cald y. Any development of Parcel 6.15 will destroy the character of the local area and will detrimentally impact upon the visual and other amenities of the adjacent Cald y Conservation Area. The current Green Belt designation of Parcel 6.15 protects the setting and special character of Cald y village which residents wish to see retained. The National Planning Policy Framework ("NPPF") clearly identifies the important role played by the Green Belt and specifically stipulates that Green Belt boundaries should only be altered where exceptional circumstances exist and are fully evidenced and justified. The Council has failed to make the case for such exceptional circumstances in relation to Parcel 6.15, and many other Green Belt sites. Accordingly , I respond to the Issues and Option Consultation as follows: 1. I object to the Green Belt Review and the methodology for the selection of sites and, in particular, the assessment relating to Parcel 6.15; I am very keen to protect and enhance the unique character and visual amenities of the Cald y Conservation Area. Sadly, the emerging Local Plan will not do so. As a local resident, I have particular concerns regarding the Wirral Green Belt Review 2019, its methodology and parcel assessments, in particular in relation to Parcel 6.15, being the land to the west of Column Road Cald y. Any development of Parcel 6.15 will destroy the character of the local area and will detrimentally impact upon the visual and other amenities of the adjacent Cald y Conservation Area. The current Green Belt designation of Parcel 6.15 protects the setting and special character of Cald y village which residents wish to see retained. The National Planning Policy Framework ("NPPF") clearly identifies the important role played by the Green Belt and specifically stipulates that Green Belt boundaries should only be altered where exceptional circumstances exist and are fully evidenced and justified.							
1247685	LPIO-13297 2 of 2		Parcel 2.16 Caldy Conservation Area		The Council has failed to make the case for such exceptional circumstances in relation to Parcel 6.15, and many other Green Belt sites. Accordingly, I respond to the Issues and Option Consultation as follows: 1. I object to the Green Belt Review and the methodology for the selection of sites and, in particular, the assessment relating to Parcel 6.15; 1.1. According to the NPPF, the Green Belt serves 7ve purposes. Contrary to the assessment in the Green Belt Review, Parcel 6.15 makes a strong contribution to purposes 1, 2, 3 and 5. 1.2. The development of the site would result in the visual and physical coalescence of two settlements, namely Cald y and West Kirby and will in effect, create a new sprawl or urban area stretching, virtually unbroken, from Cald y, through West Kirby and Ho ylake, to Meols. Parcel 6.15 makes a strong contribution to checking the unrestricted sprawl of urban areas. 1.3. It is evident that Parcel 6.15 forms a key open space separating Cald y Village and West Kirby. Parcel 6.15 makes a strong contribution in preventing neighbouring townships from merging. 1.4. Parcel 6.15 makes a strong contribution towards safeguarding the countryside from encroachment. It performs a very important role in the transition from the low density development on the eastern edge of Cald y village to the open countryside to the east of Column Road. 1.5. Parcel 6.15 makes a strong contribution towards encouraging the recycling and regeneration of derelict and urban land elsewhere in the borough. This is because the Parcel is an open green field site which performs strongly as a green belt site. 2. The Council has failed to have proper regard for the impact of any development of Parcel 6.15 upon the Cald y Conservation Area, a heritage asset, which is directly adjacent to Parcel 6.15. Any development of Parcel 6.15 will have a detrimental impact on the conservation area and will forever change the character of the approaches to the village.							
1246853	LPIO-13368	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.							
1243700	LPIO-1342	no			In times of climate change (no less an emergency?) all of the green belt in Wirral is of the same importance. The classifications used are a tool for planning and discount non planning functions. (clean air, carbon capture, biodiversity etc.) Without the foresight of our predecessors the Wirral green belt would be developed and we would not be having this argument as to whether to develop it or not, it would not be there. WBC need the same foresight now as they had in 1983. Once developers are able to encroach on parcels of land planners and developers will find ways to encroach adjacent parcels and the present restrictions of green belt development will have been breached. Green Belt is protected open space and only in planning terms would one think of "no, weak or moderate contribution". As already mentioned the Green Belt is the developers Klondike.							
1246852	LPIO-13490	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.							
1247746	LPIO-13644	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.							



Person ID	ID	Question 2.16 - Do you agree with the classification of sites set out within the 2019 Green Belt Review?	Site number / Reference:	Question 2.16b - Suggested alternative classification (please select):	Question 2.16c - Please give your reasons below. (If you don't agree with the Green Belt Review Methodology you can comment in the separate evidence consultation)	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6
1247250	LPIO-13757 1 of 2				I object strongly to the proposed release of Green Belt Parcel 6.15 under Option 2A in the Plan. Parcel 6.15 makes a strong contribution towards the 5 key purposes of the Green Belt. Purpose 1 - I have significant concerns in relation to the Green Belt Review methodology in this regard. It is not clear how and why the Birkenhead area alone is considered to fall within this definition. Further clarity is needed. In specific relation to Parcel 6.15, I note that West Kirby forms part of a long stretch of urban form which constitutes, in my view, a large urban area. Parcel 6.15 could be considered, therefore, to make a strong contribution to checking the unrestricted sprawl of urban areas. Purpose 2 - In relation to Parcel 6.15, this land is the only area of open space in this location that separates West Kirby and Caldy. I therefore consider that it makes a strong contribution to preventing neighbouring towns merging into one another. Furthermore, I have serious concerns with the following assessment of the site: ""The parcel largely forms a 'finger' of Green Belt within Settlement Area 6. it therefore forms part of a less essential gap between Settlement Area 6 and Settlement Area 7 whereby development would reduce the actual but not the perceived gap between the neighbouring towns"". The NPPF does not differentiate between 'essential' and 'less essential' gaps in this way. Further clarification is required on the basis of this assessment. In addition, I have significant concerns over the characterisation of the Parcel as a 'less essential gap'. This distinction is not made in the NPPF, therefore further clarification is required. Purpose 3 - In relation to Parcel 6.15, I have significant concerns over the following characterisation of the site: ""Because the parcel forms a 'finger' of Green Belt within Settlement Area 6, it is not well connected to the countryside"".						
1247250	LPIO-13757 2 of 2				The NPPF does not refer to connectivity of 'fingers' to the countryside. The site either is or is not in the countryside, therefore its development would represent encroachment. Parcel 6.15 therefore makes a strong contribution to Purpose 3 of the Green Belt. Purpose 4 - agree Parcel 6.15 does not make any contribution towards purpose 4. It is noted however that the Parcel is immediately adjacent to Caldy Conservation Area, which has not in my view been properly assessed by the Council. Purpose 5 - I have very significant concerns in relation to the following assumption that has been used throughout the Green Belt Review: "All Green Belt land can be considered to support urban regeneration of settlements within Wirral and it is not appropriate to state that some parts of the Green Belt perform this to a stronger or weaker degree. Therefore, all parcels make a moderate contribution to this purpose." The Green Belt Review accepts 'all parcels in the Wirral' support urban regeneration. It follows logically, that all sites make a strong contribution to Purpose 5. Overall, there are significant concerns in relation to the methodology used to produce the Green Belt Review. Further clarification is needed in regard to all of the above points. In relation to Parcel 6.15, it is my strong view that this site makes a strong contribution to Purposes 1, 2, 3 and 5, and no contribution to Purpose 4. Overall, I consider that Parcel 6.15 makes a strong contribution towards the key purposes of the Green Belt as set out at Paragraph 134 of the NPPF.						
1238192	LPIO-13786 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						
1238192	LPIO-13786 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						

Person ID	ID	Question 2.16 - Do you agree with the classification of sites set out within the 2019 Green Belt Review?	Site number / Reference:	Question 2.16b - Suggested alternative classification (please select):	Question 2.16c - Please give your reasons below. (If you don't agree with the Green Belt Review Methodology you can comment in the separate evidence consultation)	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6
1247012	LPIO-13841 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						
1247012	LPIO-13841 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1247014	LPIO-13895 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						
1247014	LPIO-13895 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						

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1242183	LPIO-13962	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1247218	LPIO-14057	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1244900	LPIO-1410	yes									
1247219	LPIO-14162	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1247220	LPIO-14259	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1247814	LPIO-14343		6.15 (SP013)		I am very keen to protect and enhance the unique character and visual amenities of the Caldys Conservation Area. Sadly, the emerging Local Plan will not do so. As a local resident, I have particular concerns regarding the Wirral Green Belt Review 2019. its methodology and parcel assessments. in particular in relation to Parcel 6.15, being the land to the west of Column Road Caldys. Any development of Parcel 6.15 will destroy the character of the local area and will detrimentally impact upon the visual and other amenities of the adjacent Caldys Conservation Area. The current Green Belt designation of Parcel 6.15 protects the setting and special character of Caldys village which residents wish to see retained. The National Planning Policy Framework ("NPPF") clearly identifies the important role played by the Green Belt and specifically stipulates that Green Belt boundaries should only be altered where exceptional circumstances exist and are fully evidenced and justified. The Council has failed to make the case for such exceptional circumstances in relation to Parcel 6.15, and many other Green Belt sites.						
1247815	LPIO-14346		6.15 (SP013)		I am very keen to protect and enhance the unique character and visual amenities of the Caldys Conservation Area. Sadly, the emerging Local Plan will not do so. As a local resident, I have particular concerns regarding the Wirral Green Belt Review 2019. its methodology and parcel assessments. in particular in relation to Parcel 6.15, being the land to the west of Column Road Caldys. Any development of Parcel 6.15 will destroy the character of the local area and will detrimentally impact upon the visual and other amenities of the adjacent Caldys Conservation Area. The current Green Belt designation of Parcel 6.15 protects the setting and special character of Caldys village which residents wish to see retained. The National Planning Policy Framework ("NPPF") clearly identifies the important role played by the Green Belt and specifically stipulates that Green Belt boundaries should only be altered where exceptional circumstances exist and are fully evidenced and justified. The Council has failed to make the case for such exceptional circumstances in relation to Parcel 6.15, and many other Green Belt sites.						
1246655	LPIO-14352		6.15 (SP013)		I am very keen to protect and enhance the unique character and visual amenities of the Caldys Conservation Area. Sadly, the emerging Local Plan will not do so. As a local resident, I have particular concerns regarding the Wirral Green Belt Review 2019. its methodology and parcel assessments. in particular in relation to Parcel 6.15, being the land to the west of Column Road Caldys. Any development of Parcel 6.15 will destroy the character of the local area and will detrimentally impact upon the visual and other amenities of the adjacent Caldys Conservation Area. The current Green Belt designation of Parcel 6.15 protects the setting and special character of Caldys village which residents wish to see retained. The National Planning Policy Framework ("NPPF") clearly identifies the important role played by the Green Belt and specifically stipulates that Green Belt boundaries should only be altered where exceptional circumstances exist and are fully evidenced and justified. The Council has failed to make the case for such exceptional circumstances in relation to Parcel 6.15, and many other Green Belt sites.						
1247222	LPIO-14391	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1247245	LPIO-14569	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1247829	LPIO-14681				I am very concerned about the classification of Green Belt parcels as weak or strong (+ in between). Green Belt was created in order to retain and safeguard open spaces between settlements and to protect habitats and species, ie biodiversity not only for its own sake but also for the enjoyment of local and other (human) visitors. Some Green Belt sites, especially those close to the sea (along Wirral Foreshore, the Dee Estuary and to a lesser degree the Mersey Estuary) act as important supporting habitat for wintering waders which may roost and feed there during the twice-daily high-tide period when feeding on the shores is not possible for these birds. While some Green Belt land may not harbour high biodiversity, ie not be the home of uncommon animal and / or plant species, it may act as a corridor for the movement of 'important' species and, in any case, helps keep settlements separate.						
1242155	LPIO-14686				The 2019 and previous Green Belt Reviews are undertaken at a macro scale. Whilst it is understood this approach enables a manageable process it prejudices the release of a much wider quantum of smaller more appropriate potential sites that collectively could deliver significant development with much more limited 'harm'. The potential greenbelt release sites proposed within the Issues and Options report were identified prior to the undertaking of the 2019 Green Belt Study which now notably classifying those areas of greenbelt making a weak contribution. Added to the wider updated 2019 Local Plan evidence base the sites for potential greenbelt release needs to fully reviewed (the Greenbelt Study does not appear to account for the outcomes of the Agricultural Economy and Land Study 2019). All sites identified with the SHLAA and SHMAA should now be subject to further detailed review against the 2019 evidence base. Using this further and updated evidence there are a number of SHLAA sites that are more suited to potential greenbelt release (than those currently proposed) against the paragraphs 133 and 134 of the NPPF that set out the role and purpose of the Green Belt (including the five purposes that green belt serves). There is specific example of SHLAA 4056 proposed for release whereby nearby SHLAA 3055 and SHLAA 3056 nearby are clearly of lesser harm against the evidence base and NPPF criteria.						
1246827	LPIO-14698	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						

Person ID	ID	Question 2.16 - Do you agree with the classification of sites set out within the 2019 Green Belt Review?	Site number / Reference:	Question 2.16b - Suggested alternative classification (please select):	Question 2.16c - Please give your reasons below. (If you don't agree with the Green Belt Review Methodology you can comment in the separate evidence consultation)	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6
1247016	LPIO-14831 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						
1247016	LPIO-14831 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1247018	LPIO-14890 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						
1247018	LPIO-14890 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						

Person ID	ID	Question 2.16 - Do you agree with the classification of sites set out within the 2019 Green Belt Review?	Site number / Reference:	Question 2.16b - Suggested alternative classification (please select):	Question 2.16c - Please give your reasons below. (If you don't agree with the Green Belt Review Methodology you can comment in the separate evidence consultation)	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6
1239377	LPIO-1506	no			I do not agree with the classification of 'weakly performing parcels' or settlements'. Furthermore, I strongly believe there should be no change to agricultural land, especially now the UK has decided on a course of separation from our EU neighbours on many fronts. Growing our own food will become more important if we are to face delays to our supply chains and extra tariffs and input tax at customs. The Council actually passed a motion in October 2019 to the effect that, agricultural land should not be included in any SHLAA.						
1238043	LPIO-1507	no			The concept of weaker (or weakly) performing Green Belt is totally alien to the objectives of creating a Green Belt in the first place. This weak word has arisen because of extreme pressure on land in the South East, and has no place here, where very little pressure exists. If this is allowed to creep in, what at present is allowed as "strongly performing" Green Belt is eroded by release of neighbouring "weakly performing" Green Belt and itself becomes weaker. My position is strongly that Green Belt is all green Belt once it has been designated in accordance with the objectives of the local plan.						
1244901	LPIO-1530	yes									
1247246	LPIO-15318	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1247248	LPIO-15421	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1247251	LPIO-15535	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1247252	LPIO-15627	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1247274	LPIO-15720	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1238246	LPIO-1577	no	7.26	High	Land parcel SP059 (West of Irby Road) Should not be classified as weakly performing. The primary purpose of greenbelt is to prevent urban sprawl, at least to the lay-person that is how it is understood. This certainly should be the primary indicator of green belts success. Given that this land is doing exactly that job in preventing the village of Irby being swallowed up into the urban sprawl of Heswall, Pensby & Thingwall which are already joined together, it is performing Highly in its function and should be judged as such.						
1247275	LPIO-15830	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1237922	LPIO-1586	no			I disagree strongly with the proposed release of Green Belt Parcel 6.15 under option2A in the Plan. Parcel 6.15 makes a strong contribution towards the 5 key purposes of the Green Belt as set out within the NPPF and must be protected.						
1247936	LPIO-15973	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1244969	LPIO-1612	no			The Green Belt review 2019 is biased toward a view of the Green Belt as potential development land. This is not the overall purpose of Green Belt as defined by the five purposes which it serves. There is no standard method for a Green Belt Review and this report has taken an extreme approach and the outcome results in vast swathes of Wirral's Green Belt falling into the alien category of 'weakly performing'. This will open the floodgates for developers both during the period of this local plan and local plans of the future. Wirral has sufficient Brown Field land, which, if encouraged through negotiation to be made available and is consigned to appropriate development will provide both employment and homes for successive generations in the future. Green Belt provides food, opportunities for recreation and a healthier environment for the residents of Wirral. There is no justification for any alteration to the Green Belt boundary until the regeneration and recycling of derelict land to the North and East of the Borough is complete.						
1245873	LPIO-16137		6.15 (SP013)		I am very keen to protect and enhance the unique character and visual amenities of the Caldby Conservation Area. Sadly, the emerging Local Plan will not do so. As a local resident, I have particular concerns regarding the Wirral Green Belt Review 2019, its methodology and parcel assessments, in particular in relation to Parcel 6.15, being the land to the west of Column Road Caldby. Any development of Parcel 6.15 will destroy the character of the local area and will detrimentally impact upon the visual and other amenities of the adjacent Caldby Conservation Area. The current Green Belt designation of Parcel 6.15 protects the setting and special character of Caldby village which residents wish to see retained. The National Planning Policy Framework ("NPPF") clearly identifies the important role played by the Green Belt and specifically stipulates that Green Belt boundaries should only be altered where exceptional circumstances exist and are fully evidenced and justified. The Council has failed to make the case for such exceptional circumstances in relation to Parcel 6.15, and many other Green Belt sites.						
1244235	LPIO-16138		6.15 (SP013)		I am very keen to protect and enhance the unique character and visual amenities of the Caldby Conservation Area. Sadly, the emerging Local Plan will not do so. As a local resident, I have particular concerns regarding the Wirral Green Belt Review 2019, its methodology and parcel assessments, in particular in relation to Parcel 6.15, being the land to the west of Column Road Caldby. Any development of Parcel 6.15 will destroy the character of the local area and will detrimentally impact upon the visual and other amenities of the adjacent Caldby Conservation Area. The current Green Belt designation of Parcel 6.15 protects the setting and special character of Caldby village which residents wish to see retained. The National Planning Policy Framework ("NPPF") clearly identifies the important role played by the Green Belt and specifically stipulates that Green Belt boundaries should only be altered where exceptional circumstances exist and are fully evidenced and justified. The Council has failed to make the case for such exceptional circumstances in relation to Parcel 6.15, and many other Green Belt sites.						

Person ID	ID	Question 2.16 - Do you agree with the classification of sites set out within the 2019 Green Belt Review?	Site number / Reference:	Question 2.16b - Suggested alternative classification (please select):	Question 2.16c - Please give your reasons below. (If you don't agree with the Green Belt Review Methodology you can comment in the separate evidence consultation)	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6
1247287	LPIO-16193	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1247344	LPIO-16280	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1247353	LPIO-16456	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1247354	LPIO-16544	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1247935	LPIO-16575	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land MUST be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA. Especially in this corona crisis, locally produced food is very important – and not being dependent on international markets.						
1247434	LPIO-16642	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1247436	LPIO-16757	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1247437	LPIO-16876	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1247439	LPIO-16877	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1247441	LPIO-17055	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1247442	LPIO-17132	no			RESPONSE TO LOCAL PLAN ISSUES AND OPTIONS CONSULTATION 2020 I am very keen to protect and enhance the unique character and visual amenities of the Caldby Conservation Area . Sadly, the emerging Local Plan will not do so. As a local resident, I have particular concerns regarding the Wirral Green Belt Review 2019. its methodology and parcel assessments. in particular in relation to Parcel 6.15, being the land to the west of Column Road Caldby. Any development of Parcel 6.15 will destroy the character of the local area and will detrimentally impact upon the visual and other amenities of the adjacent Caldby Conservation Area. The current Green Belt designation of Parcel 6.15 protects the setting and special character of Caldby village which residents wish to see retained. The National Planning Policy Framework ("NPPF") clearly identifies the important role played by the Green Belt and specifically stipulates that Green Belt boundaries should only be altered where exceptional circumstances exist and are fully evidenced and justified. The Council has failed to make the case for such exceptional circumstances in relation to Parcel 6.15, and many other Green Belt sites.						
1247443	LPIO-17135	no			RESPONSE TO LOCAL PLAN ISSUES AND OPTIONS CONSULTATION 2020 I am very keen to protect and enhance the unique character and visual amenities of the Caldby Conservation Area . Sadly, the emerging Local Plan will not do so. As a local resident, I have particular concerns regarding the Wirral Green Belt Review 2019. its methodology and parcel assessments. in particular in relation to Parcel 6.15, being the land to the west of Column Road Caldby. Any development of Parcel 6.15 will destroy the character of the local area and will detrimentally impact upon the visual and other amenities of the adjacent Caldby Conservation Area. The current Green Belt designation of Parcel 6.15 protects the setting and special character of Caldby village which residents wish to see retained. The National Planning Policy Framework ("NPPF") clearly identifies the important role played by the Green Belt and specifically stipulates that Green Belt boundaries should only be altered where exceptional circumstances exist and are fully evidenced and justified. The Council has failed to make the case for such exceptional circumstances in relation to Parcel 6.15, and many other Green Belt sites.						
1247446	LPIO-17138	no			RESPONSE TO LOCAL PLAN ISSUES AND OPTIONS CONSULTATION 2020 I am very keen to protect and enhance the unique character and visual amenities of the Caldby Conservation Area . Sadly, the emerging Local Plan will not do so. As a local resident, I have particular concerns regarding the Wirral Green Belt Review 2019. its methodology and parcel assessments. in particular in relation to Parcel 6.15, being the land to the west of Column Road Caldby. Any development of Parcel 6.15 will destroy the character of the local area and will detrimentally impact upon the visual and other amenities of the adjacent Caldby Conservation Area. The current Green Belt designation of Parcel 6.15 protects the setting and special character of Caldby village which residents wish to see retained. The National Planning Policy Framework ("NPPF") clearly identifies the important role played by the Green Belt and specifically stipulates that Green Belt boundaries should only be altered where exceptional circumstances exist and are fully evidenced and justified. The Council has failed to make the case for such exceptional circumstances in relation to Parcel 6.15, and many other Green Belt sites.						

Person ID	ID	Question 2.16 - Do you agree with the classification of sites set out within the 2019 Green Belt Review?	Site number / Reference:	Question 2.16b - Suggested alternative classification (please select):	Question 2.16c - Please give your reasons below. (If you don't agree with the Green Belt Review Methodology you can comment in the separate evidence consultation)	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6
1247445	LPIO-17141	no			RESPONSE TO LOCAL PLAN ISSUES AND OPTIONS CONSULTATION 2020 I am very keen to protect and enhance the unique character and visual amenities of the Caldý Conservation Area . Sadly, the emerging Local Plan will not do so. As a local resident, I have particular concerns regarding the Wirral Green Belt Review 2019. its methodology and parcel assessments. in particular in relation to Parcel 6.15, being the land to the west of Column Road Caldý. Any development of Parcel 6.15 will destroy the character of the local area and will detrimentally impact upon the visual and other amenities of the adjacent Caldý Conservation Area. The current Green Belt designation of Parcel 6.15 protects the setting and special character of Caldý village which residents wish to see retained. The National Planning Policy Framework ("NPPF") clearly identifies the important role played by the Green Belt and specifically stipulates that Green Belt boundaries should only be altered where exceptional circumstances exist and are fully evidenced and justified. The Council has failed to make the case for such exceptional circumstances in relation to Parcel 6.15, and many other Green Belt sites.						
1247447	LPIO-17144	no			RESPONSE TO LOCAL PLAN ISSUES AND OPTIONS CONSULTATION 2020 I am very keen to protect and enhance the unique character and visual amenities of the Caldý Conservation Area . Sadly, the emerging Local Plan will not do so. As a local resident, I have particular concerns regarding the Wirral Green Belt Review 2019. its methodology and parcel assessments. in particular in relation to Parcel 6.15, being the land to the west of Column Road Caldý. Any development of Parcel 6.15 will destroy the character of the local area and will detrimentally impact upon the visual and other amenities of the adjacent Caldý Conservation Area. The current Green Belt designation of Parcel 6.15 protects the setting and special character of Caldý village which residents wish to see retained. The National Planning Policy Framework ("NPPF") clearly identifies the important role played by the Green Belt and specifically stipulates that Green Belt boundaries should only be altered where exceptional circumstances exist and are fully evidenced and justified. The Council has failed to make the case for such exceptional circumstances in relation to Parcel 6.15, and many other Green Belt sites.						
1247448	LPIO-17147	no			RESPONSE TO LOCAL PLAN ISSUES AND OPTIONS CONSULTATION 2020 I am very keen to protect and enhance the unique character and visual amenities of the Caldý Conservation Area . Sadly, the emerging Local Plan will not do so. As a local resident, I have particular concerns regarding the Wirral Green Belt Review 2019. its methodology and parcel assessments. in particular in relation to Parcel 6.15, being the land to the west of Column Road Caldý. Any development of Parcel 6.15 will destroy the character of the local area and will detrimentally impact upon the visual and other amenities of the adjacent Caldý Conservation Area. The current Green Belt designation of Parcel 6.15 protects the setting and special character of Caldý village which residents wish to see retained. The National Planning Policy Framework ("NPPF") clearly identifies the important role played by the Green Belt and specifically stipulates that Green Belt boundaries should only be altered where exceptional circumstances exist and are fully evidenced and justified. The Council has failed to make the case for such exceptional circumstances in relation to Parcel 6.15, and many other Green Belt sites.						
1238217	LPIO-17150	no			RESPONSE TO LOCAL PLAN ISSUES AND OPTIONS CONSULTATION 2020 I am very keen to protect and enhance the unique character and visual amenities of the Caldý Conservation Area . Sadly, the emerging Local Plan will not do so. As a local resident, I have particular concerns regarding the Wirral Green Belt Review 2019. its methodology and parcel assessments. in particular in relation to Parcel 6.15, being the land to the west of Column Road Caldý. Any development of Parcel 6.15 will destroy the character of the local area and will detrimentally impact upon the visual and other amenities of the adjacent Caldý Conservation Area. The current Green Belt designation of Parcel 6.15 protects the setting and special character of Caldý village which residents wish to see retained. The National Planning Policy Framework ("NPPF") clearly identifies the important role played by the Green Belt and specifically stipulates that Green Belt boundaries should only be altered where exceptional circumstances exist and are fully evidenced and justified. The Council has failed to make the case for such exceptional circumstances in relation to Parcel 6.15, and many other Green Belt sites.						
1247449	LPIO-17154	no			RESPONSE TO LOCAL PLAN ISSUES AND OPTIONS CONSULTATION 2020 I am very keen to protect and enhance the unique character and visual amenities of the Caldý Conservation Area . Sadly, the emerging Local Plan will not do so. As a local resident, I have particular concerns regarding the Wirral Green Belt Review 2019. its methodology and parcel assessments. in particular in relation to Parcel 6.15, being the land to the west of Column Road Caldý. Any development of Parcel 6.15 will destroy the character of the local area and will detrimentally impact upon the visual and other amenities of the adjacent Caldý Conservation Area. The current Green Belt designation of Parcel 6.15 protects the setting and special character of Caldý village which residents wish to see retained. The National Planning Policy Framework ("NPPF") clearly identifies the important role played by the Green Belt and specifically stipulates that Green Belt boundaries should only be altered where exceptional circumstances exist and are fully evidenced and justified. The Council has failed to make the case for such exceptional circumstances in relation to Parcel 6.15, and many other Green Belt sites.						
1247741	LPIO-17157	no			RESPONSE TO LOCAL PLAN ISSUES AND OPTIONS CONSULTATION 2020 I am very keen to protect and enhance the unique character and visual amenities of the Caldý Conservation Area . Sadly, the emerging Local Plan will not do so. As a local resident, I have particular concerns regarding the Wirral Green Belt Review 2019. its methodology and parcel assessments. in particular in relation to Parcel 6.15, being the land to the west of Column Road Caldý. Any development of Parcel 6.15 will destroy the character of the local area and will detrimentally impact upon the visual and other amenities of the adjacent Caldý Conservation Area. The current Green Belt designation of Parcel 6.15 protects the setting and special character of Caldý village which residents wish to see retained. The National Planning Policy Framework ("NPPF") clearly identifies the important role played by the Green Belt and specifically stipulates that Green Belt boundaries should only be altered where exceptional circumstances exist and are fully evidenced and justified. The Council has failed to make the case for such exceptional circumstances in relation to Parcel 6.15, and many other Green Belt sites.						

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1247743	LPIO-17158	no			RESPONSE TO LOCAL PLAN ISSUES AND OPTIONS CONSULTATION 2020 I am very keen to protect and enhance the unique character and visual amenities of the Caldys Conservation Area . Sadly, the emerging Local Plan will not do so. As a local resident, I have particular concerns regarding the Wirral Green Belt Review 2019. its methodology and parcel assessments. in particular in relation to Parcel 6.15, being the land to the west of Column Road Caldys. Any development of Parcel 6.15 will destroy the character of the local area and will detrimentally impact upon the visual and other amenities of the adjacent Caldys Conservation Area. The current Green Belt designation of Parcel 6.15 protects the setting and special character of Caldys village which residents wish to see retained. The National Planning Policy Framework ("NPPF") clearly identifies the important role played by the Green Belt and specifically stipulates that Green Belt boundaries should only be altered where exceptional circumstances exist and are fully evidenced and justified. The Council has failed to make the case for such exceptional circumstances in relation to Parcel 6.15, and many other Green Belt sites.						
1247960	LPIO-17176	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1247962	LPIO-17263	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1247966	LPIO-17368	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1242519	LPIO-1741	no			I do not agree, agricultural land should be kept as such.						
1247971	LPIO-17470	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1241726	LPIO-17564	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1247979	LPIO-17674	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1247980	LPIO-17675	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1245502	LPIO-17855	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1247541	LPIO-17957	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1247539	LPIO-18066	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1245060	LPIO-1814	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land MUST be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1247987	LPIO-18165	no			RESPONSE TO LOCAL PLAN ISSUES AND OPTIONS CONSULTATION 2020 I am very keen to protect and enhance the unique character and visual amenities of the Caldys Conservation Area . Sadly, the emerging Local Plan will not do so. As a local resident, I have particular concerns regarding the Wirral Green Belt Review 2019. its methodology and parcel assessments. in particular in relation to Parcel 6.15, being the land to the west of Column Road Caldys. Any development of Parcel 6.15 will destroy the character of the local area and will detrimentally impact upon the visual and other amenities of the adjacent Caldys Conservation Area. The current Green Belt designation of Parcel 6.15 protects the setting and special character of Caldys village which residents wish to see retained. The National Planning Policy Framework ("NPPF") clearly identifies the important role played by the Green Belt and specifically stipulates that Green Belt boundaries should only be altered where exceptional circumstances exist and are fully evidenced and justified. The Council has failed to make the case for such exceptional circumstances in relation to Parcel 6.15, and many other Green Belt sites.						
1237857	LPIO-18168	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land MUST be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA. The Covid-19 episode should advise us strongly of the need to keep and enhance our local agricultural capability yet the plans include green belt that is under agricultural production.						
1247988	LPIO-18178	no			RESPONSE TO LOCAL PLAN ISSUES AND OPTIONS CONSULTATION 2020 I am very keen to protect and enhance the unique character and visual amenities of the Caldys Conservation Area . Sadly, the emerging Local Plan will not do so. As a local resident, I have particular concerns regarding the Wirral Green Belt Review 2019. its methodology and parcel assessments. in particular in relation to Parcel 6.15, being the land to the west of Column Road Caldys. Any development of Parcel 6.15 will destroy the character of the local area and will detrimentally impact upon the visual and other amenities of the adjacent Caldys Conservation Area. The current Green Belt designation of Parcel 6.15 protects the setting and special character of Caldys village which residents wish to see retained. The National Planning Policy Framework ("NPPF") clearly identifies the important role played by the Green Belt and specifically stipulates that Green Belt boundaries should only be altered where exceptional circumstances exist and are fully evidenced and justified. The Council has failed to make the case for such exceptional circumstances in relation to Parcel 6.15, and many other Green Belt sites.						



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1247989	LPIO-18179	no			RESPONSE TO LOCAL PLAN ISSUES AND OPTIONS CONSULTATION 2020 I am very keen to protect and enhance the unique character and visual amenities of the Caldý Conservation Area . Sadly, the emerging Local Plan will not do so. As a local resident, I have particular concerns regarding the Wirral Green Belt Review 2019. its methodology and parcel assessments. in particular in relation to Parcel 6.15, being the land to the west of Column Road Caldý. Any development of Parcel 6.15 will destroy the character of the local area and will detrimentally impact upon the visual and other amenities of the adjacent Caldý Conservation Area. The current Green Belt designation of Parcel 6.15 protects the setting and special character of Caldý village which residents wish to see retained. The National Planning Policy Framework ("NPPF") clearly identifies the important role played by the Green Belt and specifically stipulates that Green Belt boundaries should only be altered where exceptional circumstances exist and are fully evidenced and justified. The Council has failed to make the case for such exceptional circumstances in relation to Parcel 6.15, and many other Green Belt sites.						
1247990	LPIO-18186	no			RESPONSE TO LOCAL PLAN ISSUES AND OPTIONS CONSULTATION 2020 I am very keen to protect and enhance the unique character and visual amenities of the Caldý Conservation Area . Sadly, the emerging Local Plan will not do so. As a local resident, I have particular concerns regarding the Wirral Green Belt Review 2019. its methodology and parcel assessments. in particular in relation to Parcel 6.15, being the land to the west of Column Road Caldý. Any development of Parcel 6.15 will destroy the character of the local area and will detrimentally impact upon the visual and other amenities of the adjacent Caldý Conservation Area. The current Green Belt designation of Parcel 6.15 protects the setting and special character of Caldý village which residents wish to see retained. The National Planning Policy Framework ("NPPF") clearly identifies the important role played by the Green Belt and specifically stipulates that Green Belt boundaries should only be altered where exceptional circumstances exist and are fully evidenced and justified. The Council has failed to make the case for such exceptional circumstances in relation to Parcel 6.15, and many other Green Belt sites.						
1247992	LPIO-18192	no			RESPONSE TO LOCAL PLAN ISSUES AND OPTIONS CONSULTATION 2020 I am very keen to protect and enhance the unique character and visual amenities of the Caldý Conservation Area . Sadly, the emerging Local Plan will not do so. As a local resident, I have particular concerns regarding the Wirral Green Belt Review 2019. its methodology and parcel assessments. in particular in relation to Parcel 6.15, being the land to the west of Column Road Caldý. Any development of Parcel 6.15 will destroy the character of the local area and will detrimentally impact upon the visual and other amenities of the adjacent Caldý Conservation Area. The current Green Belt designation of Parcel 6.15 protects the setting and special character of Caldý village which residents wish to see retained. The National Planning Policy Framework ("NPPF") clearly identifies the important role played by the Green Belt and specifically stipulates that Green Belt boundaries should only be altered where exceptional circumstances exist and are fully evidenced and justified. The Council has failed to make the case for such exceptional circumstances in relation to Parcel 6.15, and many other Green Belt sites.						
1247995	LPIO-18200	no			RESPONSE TO LOCAL PLAN ISSUES AND OPTIONS CONSULTATION 2020 I am very keen to protect and enhance the unique character and visual amenities of the Caldý Conservation Area . Sadly, the emerging Local Plan will not do so. As a local resident, I have particular concerns regarding the Wirral Green Belt Review 2019. its methodology and parcel assessments. in particular in relation to Parcel 6.15, being the land to the west of Column Road Caldý. Any development of Parcel 6.15 will destroy the character of the local area and will detrimentally impact upon the visual and other amenities of the adjacent Caldý Conservation Area. The current Green Belt designation of Parcel 6.15 protects the setting and special character of Caldý village which residents wish to see retained. The National Planning Policy Framework ("NPPF") clearly identifies the important role played by the Green Belt and specifically stipulates that Green Belt boundaries should only be altered where exceptional circumstances exist and are fully evidenced and justified. The Council has failed to make the case for such exceptional circumstances in relation to Parcel 6.15, and many other Green Belt sites.						
1247996	LPIO-18216	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1245069	LPIO-1822	no			In a unique geographic area all green belt is of high value, the categories show do not consider the overall impact on the environment should they be lost to development. In defining these parcels of land other facts need to be considered as part of the local plan. In the context of the Wirral as a whole.						
1247021	LPIO-18383 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						

Person ID	ID	Question 2.16 - Do you agree with the classification of sites set out within the 2019 Green Belt Review?	Site number / Reference:	Question 2.16b - Suggested alternative classification (please select):	Question 2.16c - Please give your reasons below. (If you don't agree with the Green Belt Review Methodology you can comment in the separate evidence consultation)	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6
1247021	LPIO-18383 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1247022	LPIO-18436 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						
1247022	LPIO-18436 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1247023	LPIO-18490 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						

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1247023	LPIO-18490 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1247024	LPIO-18546 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						
1247024	LPIO-18546 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1247025	LPIO-18604 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						

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1247025	LPIO-18604 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1247038	LPIO-18605 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						
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1247039	LPIO-18727 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						

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1247039	LPIO-18727 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1247040	LPIO-18728 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						
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1247041	LPIO-18834 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1247042	LPIO-18900 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						
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1247060	LPIO-18972 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						

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1247063	LPIO-19077 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1247064	LPIO-19131 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						
1247064	LPIO-19131 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1247068	LPIO-19185 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						



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1247068	LPIO-19185 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1247071	LPIO-19241 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						
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1247072	LPIO-19297 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						

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1247072	LPIO-19297 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1247078	LPIO-19354 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						
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1247080	LPIO-19414 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						

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1247080	LPIO-19414 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1247081	LPIO-19415 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						
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1247082	LPIO-19622 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1247083	LPIO-19677 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						
1247083	LPIO-19677 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1247084	LPIO-19732 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						

Person ID	ID	Question 2.16 - Do you agree with the classification of sites set out within the 2019 Green Belt Review?	Site number / Reference:	Question 2.16b - Suggested alternative classification (please select):	Question 2.16c - Please give your reasons below. (If you don't agree with the Green Belt Review Methodology you can comment in the separate evidence consultation)	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6
1247084	LPIO-19732 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1247085	LPIO-19795 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						
1247085	LPIO-19795 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1247088	LPIO-19856 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						

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1247088	LPIO-19856 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1247089	LPIO-19917 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						
1247089	LPIO-19917 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1247090	LPIO-19977 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						

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1247090	LPIO-19977 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1242541	LPIO-2002	no			Particular concern is the development of prime agricultural farmland and important natural habitats. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA						
1247091	LPIO-20032 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						
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1247092	LPIO-20087 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.							
1247092	LPIO-20087 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.							
1247093	LPIO-20149 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.							
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1244898	LPIO-2021	no	7.27 (SP060) Land between Irby and Pensby (plus all others)	High	Definitely NO. The Green Belt Review + Site and Parcel classifications are flawed and 'unsound'. The methodology and results have been commented upon under LP Evidence Base – Green Belt Review 2019. Please include those comments here. Files attached to LP Evidence Base – GB Review 2019 comments are attached here. For a Site/Parcel's contribution to be classified 'strong' or 'high' can need just one GB Purpose to be contravened – it is NOT an averaging process. For Site 7.27, selection/classification would contravene Purpose 1 (Sprawl) by adding Irby to the existing large built-up, separate area of Thingwall, Pensby and Heswall; Purpose 2 (Merge) by merging the distinct communities of Irby, Thingwall and Pensby; Purpose 3 (Encroachment) as the site is so large (1.25km x 1km) that it appears to be open countryside – also a 'green corridor' with ancient woodland, medieval land formation and vulnerable nature; Purpose 4 (Historic Setting) as Irby is an ancient and historic settlement with known Heritage assets including related to the Battle of Brunanburh (see submitted paper by Prof David Gregg); and Purpose 5 (Assist Regeneration) where attached documents show the unique relevance of Purpose 5 to Wirral - to say all GB does this is to misunderstand the special situation here and the 'exceptional circumstances'. In addition, there are the aspects of Character and Harm that have not been taken into account at all and should be. Irby is a semi-rural village; Thingwall and Pensby are large dormitory towns with their own community and shopping centres. Similar comments apply to all 12 Option 2A Sites, all 4 Option 2B Sites and all other Sites classified as 'weakly performing'. Read with the ITPAS DOR Consultation 2018 Response provided to Forward Planning, most of which remains relevant to this Consultation.	<a href="https://wirral-consult.objective.co.uk/file/567748">https://wirral-consult.objective.co.uk/file/567748</a>					
1247094	LPIO-20210 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						
1247094	LPIO-20210 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns/townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1245083	LPIO-2022	no			Agricultural land should be kept as such. WBC passed a motion in 2019 to the effect that agricultural land should not be included in any SHLAA						
1247095	LPIO-20266 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						

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1247095	LPIO-20266 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1247096	LPIO-20321 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						
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1247099	LPIO-20378 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						

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1247102	LPIO-20558 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						
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1247106	LPIO-20597 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						

Person ID	ID	Question 2.16 - Do you agree with the classification of sites set out within the 2019 Green Belt Review?	Site number / Reference:	Question 2.16b - Suggested alternative classification (please select):	Question 2.16c - Please give your reasons below. (If you don't agree with the Green Belt Review Methodology you can comment in the separate evidence consultation)	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6
1247106	LPIO-20597 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1247105	LPIO-20598 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						
1247105	LPIO-20598 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1237870	LPIO-2062	no			I DO NOT agree with the classification. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA. WE NEED AGRICULTURAL LAND FOR FOOD Labour policies are in place to protect workers and their rights to a job. If agricultural land is used for development purposes this will put men and women out of work !!						

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1247109	LPIO-20702 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.							
1247109	LPIO-20702 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.							
1247110	LPIO-20759 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.							
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1247111	LPIO-20760 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						
1247111	LPIO-20760 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 iteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1241016	LPIO-208	yes									
1245105	LPIO-2082	no			I do not understand why the large area marked for development by Heswall and Barnston is described as 'weakly performing greenbelt' as it appears to serve the role of greenbelt completely. It provides sustainable local food production, marks the boundaries between different towns, prevents urban sprawl. It also controls the population of the area in relation to its infrastructure, in particular roads.						
1247112	LPIO-20921 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						

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1247112	LPIO-20921 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1247113	LPIO-20976 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						
1247113	LPIO-20976 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1247115	LPIO-21032 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						



Person ID	ID	Question 2.16c - Do you agree with the classification of sites set out within the 2019 Green Belt Review?	Site number / Reference:	Question 2.16b - Suggested alternative classification (please select):	Question 2.16c - Please give your reasons below. (If you don't agree with the Green Belt Review Methodology you can comment in the separate evidence consultation)	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6
1247115	LPIO-21032 2 of 2	yes			This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1247116	LPIO-21086 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						
1247116	LPIO-21086 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1246851	LPIO-21150	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1245100	LPIO-2118	no		No overall contribution	Of particular concern is the development on prime agricultural land and important natural habitats. WBC passed a motion to the effect that agricultural land should not be included in any SHLAA.						
1238835	LPIO-2121	no			I do not agree with the classification of weakly performing parcels of land or settlements whatsoever. Once again your analysis is flawed. The Greenbelt exists for the protection of us all, not for the profit of the few. Greenbelt provides much needed protection and support for our environment. I would also like to remind you that in October 2019, Wirral Borough Council passed a motion stating that "no agricultural land should be included in any current or future SHLAA". I would also like to remind the Council that the Government have stated quite categorically that agricultural output MUST increase by at least 20% by the year 2050. This would not be possible if our farmland is buried under concrete.						
1246918	LPIO-21261	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1246924	LPIO-21262	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						

Person ID	ID	Question 2.16 - Do you agree with the classification of sites set out within the 2019 Green Belt Review?	Site number / Reference:	Question 2.16b - Suggested alternative classification (please select):	Question 2.16c - Please give your reasons below. (If you don't agree with the Green Belt Review Methodology you can comment in the separate evidence consultation)	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6
1246928	LPIO-21263	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1245112	LPIO-2137	yes									
1246920	LPIO-21513				I do not agree with the classification of weakly performing parcels or settlements. Agricultural land MUST be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1246926	LPIO-21514	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1247117	LPIO-21669 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						
1247117	LPIO-21669 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns / townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1247118	LPIO-21670 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						

Person ID	ID	Question 2.16 - Do you agree with the classification of sites set out within the 2019 Green Belt Review?	Site number / Reference:	Question 2.16b - Suggested alternative classification (please select):	Question 2.16c - Please give your reasons below. (If you don't agree with the Green Belt Review Methodology you can comment in the separate evidence consultation)	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6
1247118	LPIO-21670 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1247145	LPIO-21777 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						
1247145	LPIO-21777 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1247147	LPIO-21778 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						

Person ID	ID	Question 2.16 - Do you agree with the classification of sites set out within the 2019 Green Belt Review?	Site number / Reference:	Question 2.16b - Suggested alternative classification (please select):	Question 2.16c - Please give your reasons below. (If you don't agree with the Green Belt Review Methodology you can comment in the separate evidence consultation)	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6
1247147	LPIO-21778 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1247148	LPIO-21885 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						
1247148	LPIO-21885 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1247150	LPIO-21886 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						

Person ID	ID	Question 2.16 - Do you agree with the classification of sites set out within the 2019 Green Belt Review?	Site number / Reference:	Question 2.16b - Suggested alternative classification (please select):	Question 2.16c - Please give your reasons below. (If you don't agree with the Green Belt Review Methodology you can comment in the separate evidence consultation)	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6
1247150	LPIO-21886 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1244329	LPIO-21996 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						
1244329	LPIO-21996 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1247119	LPIO-22057 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						

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1247119	LPIO-22057 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1246678	LPIO-22058 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						
1246678	LPIO-22058 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1247151	LPIO-22166 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						

Person ID	ID	Question 2.16c - Do you agree with the classification of sites set out within the 2019 Green Belt Review?	Site number / Reference:	Question 2.16b - Suggested alternative classification (please select):	Question 2.16c - Please give your reasons below. (If you don't agree with the Green Belt Review Methodology you can comment in the separate evidence consultation)	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6
1247151	LPIO-22166 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1247152	LPIO-22167 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						
1247152	LPIO-22167 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1244898	LPIO-2217	no	Site 7.26 (SP059E) Rear of Irby Hall	High	Again, definitely NO. GB Review and Site/Parcel classifications are flawed/unsound. Refer to first Q2.16 Response and Evidence Base GB Review Response incl. uploaded files still relevant here also. For a contribution to be 'strong' needs just one GB Purpose contravened – it's NOT an averaging process. For Site 7.26, contraventions include Purpose 1 (Sprawl) by adding large site to existing built-up area; Purpose 3 (Encroach) as site is so large development would encroach greatly into countryside and harm setting, views and public amenity; Purpose 4 (Historic Setting) as Irby is an ancient settlement with known Heritage assets incl. related to Battle of Brunanburh (see paper by Prof Gregg), harm to setting of Ancient Monument of exemplar moated Irby Hall, ditto Londymere Roman Well; and Purpose 5 (Assist Regeneration) where documents with first Q2.16 Response show the unique relevance of Purpose 5 to Wirral - to say all GB does this is to completely misunderstand the special situation here and the 'exceptional circumstances' applying uniquely to Wirral. In addition, there are the aspects of Character and Harm that have not been taken into account at all and should be: fragile wildlife/ecology incl. Great Crested Newt Colony, large scheduled 'open water' pond, Migrating/Wading Bird foraging area, BMV Agri land, Irby Village Sense of Place, loss of rural character, and more. Similar comments apply to all 12 Option 2A Sites, all 4 Option 2B Sites and all other Sites classified as 'weakly performing'. Read with uploaded ITPAS DOR Consultation 2018 Response provided to Forward Planning, most of which remains relevant to this Consultation. Particularly paragraphs 2.33 to 2.46 inclusive apply directly to this Site, 7.26.	<a href="https://wirral-consult.objective.co.uk/file/567773">https://wirral-consult.objective.co.uk/file/567773</a>					

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1247153	LPIO-22280 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.							
1247153	LPIO-22280 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.							
1247155	LPIO-22281 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.							
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1247156	LPIO-22388 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.							
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1247158	LPIO-22389 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.							
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1244898	LPIO-2239	no	Site 7.25 (SP009 part) West of Sandy Lane	High	NO. GB Review + Site/Parcel classifications are flawed/unsound. Refer to 1st/2nd Q2.16 Responses + Evidence Base GB Review Response incl. still relevant uploaded files. For contribution to be 'strong' needs just one GB Purpose contravened – it's NOT an averaging process. Site 7.25, contraventions include Purpose 1 (Sprawl) adding long site to existing built-up area; Purpose 3 (Encroachment) as site is long development would encroach significantly into countryside harming Area of Special Landscape Value, sense of place, views, public amenity and fragile Greasby Brook; Purpose 4 (Historic Setting) Irby is an ancient settlement with known Heritage assets incl. related to Battle of Brunanburh (see Prof Gregg paper), access road is an ancient road; and Purpose 5 (Assist Regen) where docs with 1st Q2.16 Response show unique relevance of Purpose 5 to Wirral - saying all GB does this is to completely misunderstand the special situation here and "exceptional circumstances" applying uniquely to Wirral. In addition, there are the aspects of Character and Harm that have not been taken into account and should be: fragile wildlife/ecology, Sense of Place, loss of rural character, area of high incidence of primary school children walking to/from School, narrow access road which is already a 'rat-run' with imminent traffic-calming measures, heavily trafficked route for cars and pedestrians accessing Thurston Common, the woods and Royden Park - walkers and dog-walkers, parking problems worsened by Council charges elsewhere, and more. Similar comments apply to all 12 Option 2A Sites, all 4 Option 2B Sites and all other Sites classified as 'weakly performing'. Read with uploaded ITPAS DOR Consultation 2018 Response (especially Appendix 6 – Assessment of GB Sites) provided to FPlan and again with Q2.16 2nd Response, most remains relevant here despite this Site NOT being one of '48 GB Sites for Further Investigation'.						
1247159	LPIO-22576 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						
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1247168	LPIO-22757 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1247169	LPIO-22944 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						
1247169	LPIO-22944 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1247170	LPIO-22945 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						

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1247170	LPIO-22945 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1247173	LPIO-23033 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						
1247173	LPIO-23033 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1247174	LPIO-23034 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						

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1247174	LPIO-23034 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1247175	LPIO-23141 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						
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1247176	LPIO-23142 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						

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1247176	LPIO-23142 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1247177	LPIO-23268 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						
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1247178	LPIO-23269 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						



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1247178	LPIO-23269 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1247179	LPIO-23270 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.						
1247179	LPIO-23270 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas E.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1245146	LPIO-2328	no			Weakly performing green belt is not a term referred to in NPPF and as such is of questionable definition. ARUP's Review has several flaws relating to "settlements" and ignores the many benefits of and contribution of Green Belt from the environmental perspective such as health and leisure, tourism and wildlife.						
1248463	LPIO-23742	no			NPPF Paragraph 136 clearly sets out that Local Planning Authorities should only seek to alter Green Belt boundaries in exceptional circumstances. It is our view that the Council has failed to demonstrate exceptional circumstances for revising boundaries. This is of great concern as we feel that far-reaching changes to the Green Belt are being considered without justification. Paragraph 138 states that when reviewing Green Belt boundaries, Local Planning Authorities should promote sustainable patterns of development. We have overarching concerns with the Green Belt Review, which we do not feel promotes sustainable development. The Green Belt Review does not give adequate 'first consideration' to previously developed sites and/or those that are well served by public transport. We disagree that Parcel 6.15 makes no contribution to purpose 1, because West Kirby is in our view a large urban area and that it makes a 'weak' contribution to purpose 2, as it is the only open space separating Caldly from West Kirby. It makes a strong contribution to purpose 3 and to purpose 5 and is immediately adjacent to Caldly Conservation Area, which has not in our view been properly assessed. We conclude Parcel 6.15 makes a strong contribution to the purposes of the Green Belt and consider the Green Belt Review to be seriously flawed (more detailed comments have been submitted to the Green Belt Review itself).	<a href="https://wirral-consult.objective.co.uk/file/5657858">https://wirral-consult.objective.co.uk/file/5657858</a>					

Person ID	ID	Question 2.16 - Do you agree with the classification of sites set out within the 2019 Green Belt Review?	Site number / Reference:	Question 2.16b - Suggested alternative classification (please select):	Question 2.16c - Please give your reasons below. (If you don't agree with the Green Belt Review Methodology you can comment in the separate evidence consultation)	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6	
1248389	Highways England	LPIO-23760			The latest boundary was last amended to include additional land within the M53 corridor within the UDP (Section 7). The Issues and Options document identifies that the release of Green Belt will only be considered as an exceptional circumstance and there will be a necessity to ensure that impact is minimised. Lower performing parcels which currently make a weak overall contribution to the Green Belt will have the greatest potential, and these are reviewed against a detailed feasibility study, as part of the supporting documentation which has been reviewed in Chapter 3. Highways England wish to highlight that as part of this review there would be concern for the SRN in terms of the location of the sites in close proximity to the M53.							
1248438		LPIO-23761			It is noted that the Council has adopted a different approach to that in the 2017 Green Belt Assessment, with a more consistent approach to the scale of Green Belt Parcels. This revised approach is welcomed. We support the identification of Green Belt Parcel 7.25 as a potential Green Belt release and housing allocation in the emerging Local Plan. Overall, the methodology applied by the Council in the preparation of its revised Green Belt Assessment is considered to be more robust than that previously prepared in 2018.	<a href="https://wirral-consult.objective.co.uk/file/5684850">https://wirral-consult.objective.co.uk/file/5684850</a>	<a href="https://wirral-consult.objective.co.uk/file/5657890">https://wirral-consult.objective.co.uk/file/5657890</a>					
1248445		LPIO-23820 1 of 2			The Review of the Green Belt must be viewed as a review in order to identify parcels that could support housing development rather than an open-minded review for all related purposes. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have been robust and stable and have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. Such a position requires hard evidence and, in the absence of this, there appear to be no circumstances that justify any releases, certainly not to meet a discredited assessment of housing need. Parcels 7.15 to 7.19. These are assessed as making no contribution to checking the unrestricted sprawl of large built up areas. Their designation as Green Belt has actually prevented sprawl from the built-up areas of Heswall, Pensby, Thingwall and Upton. These descriptions under Parcel 7.20 are also clearly applicable to Parcels 7.15 to 7.19, yet all secure only "Moderate" for Purpose 3. Parcel 7.16: The over prescriptive definition of "town" fails to give adequate weight to villages and hamlets, which give the green areas of Wirral their unique character. Parcel 7.16 omits Barnston. Its exclusion as a "washed over" village, obscures the fact that it is a historic entity, in a conservation area and is greatly enhanced by the surrounding farmland and open country. Its immediate environment is one of the most attractive locations of the Wirral and it is not understood how this, and the adjoining parcels can be assessed as making a weak contribution to the Green Belt.	<a href="https://wirral-consult.objective.co.uk/file/5659115">https://wirral-consult.objective.co.uk/file/5659115</a>	<a href="https://wirral-consult.objective.co.uk/file/5659116">https://wirral-consult.objective.co.uk/file/5659116</a>					
1248445		LPIO-23820 2 of 2			The tree lined (many with TPO's) road approaches, especially from the south set the context of this rural area. It is not mentioned that this parcel supports a beneficial Green Belt use in providing access to countryside in common with adjoining parcels through public footpaths between Barnston and Heswall. Elsewhere (e.g. 7.25) such features contribute to a strong score. Parcel 7.19: is described as "flat". It includes Cross Hill, a high point in the locality with many historical attributes. Parcel 7.20: The overall assessment of just this parcel is "strong", secured by the application of professional judgement. Visual appreciation of 7.20 raises very real doubts as to the validity of this assessment. For example, the description of 7.20 under Purpose 3 includes "strongly connected to the countryside.... natural field boundaries.....a tree line... less than 20% built.... long line views. The parcel supports a strong-moderate degree of openness." These descriptions are also clearly applicable to the parcels 7.15 to 7.19, yet all secure only "Moderate" for Purpose 3. Given that "professional judgement" is critical, in arriving at these assessment scores, it is unfortunate that no detail is given of the professional expertise brought to bear. Is it planning, physical geography, environmental, ecological etc? This information should accompany the opinion. It is regrettable the Council has not worked with the grain of public opinion in its preparation of the draft local plan. With 46 parcels assessed as making a weak contribution, every one of these is a candidate for development. It is not clear, apart from the obvious economies of scale, why the 46 have not been comparatively assessed to arrive at a short list.							
1248448		LPIO-23854			The parcels identified to carry out the assessment of the importance they play in meeting the five purposes of the Green Belt are too large and insufficiently fine grained to properly assess the contribution that smaller parcels make or do not make to the Green Belt. Our site is part of the much larger Parcel 4.12. A more fine-grained assessment would result in different conclusions.	<a href="https://wirral-consult.objective.co.uk/file/5656108">https://wirral-consult.objective.co.uk/file/5656108</a>	<a href="https://wirral-consult.objective.co.uk/file/5656110">https://wirral-consult.objective.co.uk/file/5656110</a>					
1244826		LPIO-2388	no	Weak	I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such and is required to support our local production of goods and to maintain local jobs. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.							
1242185		LPIO-23891 1 of 2	no		No. The Merseyside Green Belt has performed its nationally significant planning role well, pretty much unchanged from designation in 1983. It keeps land permanently open and performing five key purposes as set out in NPPF Paragraph 134. Sir Patrick Abercrombie, renowned architect and town planner at the University of Liverpool in 1915. He lived in Wirral, and he established the Wirral Society, a forerunner of what was to become the Campaign to Protect Rural England (CPRE). His legacy has kept Wirral's beloved countryside protected and the public is united in wanting to protect greenspace, sensing sacrilege to allow Green Belt to be lost too easily. The Government reiterates the promise to protect Green Belt. The NPPF Paragraph 136 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." Consequently, it is believed that the Council has failed to provide sufficient evidence that the tests for exceptional circumstances are met. NPPF Paragraph 137 sets out that the local authority must show it has examined fully all other reasonable options for meeting its identified need for development. We believe much more can, and should, be done. By increasing the use of brownfield, having appropriate density of development and by improved coordination with neighbours, making more effective use of land is more likely to be complied with and the need to release any Green Belt land is eradicated, certainly the case there is an exceptional circumstance is eroded. The Green Belt must be subject to a thorough strategic review to understand the purposes served and the robustness of each parcel in terms of keeping land permanently open. You have to have a robust method. Although the NPPF and PPG does not provide specific guidance on how Green Belt Reviews should be undertaken, the Planning Advisory Service (PAS) has released guidance on how to review Green Belts and this is supplemented by Inspectors decisions and national policy. These provide additional context and guidance for undertaking a study of the Green Belt.	<a href="https://wirral-consult.objective.co.uk/file/5659121">https://wirral-consult.objective.co.uk/file/5659121</a>	<a href="https://wirral-consult.objective.co.uk/file/5684263">https://wirral-consult.objective.co.uk/file/5684263</a>	<a href="https://wirral-consult.objective.co.uk/file/5657006">https://wirral-consult.objective.co.uk/file/5657006</a>				

Person ID	ID	Question 2.16 - Do you agree with the classification of sites set out within the 2019 Green Belt Review?	Site number / Reference:	Question 2.16b - Suggested alternative classification (please select):	Question 2.16c - Please give your reasons below. (If you don't agree with the Green Belt Review Methodology you can comment in the separate evidence consultation)	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6
1242185	LPIO-23891 2 of 2	no			We therefore recommend a systematic methodology that focuses first on the five purposes of the Green Belt and then considers the other constraints to development is required so like for like comparison of relative value can be made. We have considered the 2019 Report but the shading for no contribution and weak contribution is difficult to distinguish on the Figure 8 Choropleth map of Green Belt parcel assessment as the base layer is of a similar tone, making the information difficult to interpret. There are a number of other issues with the robustness of the Green Belt Review. We highlight the significance of NPPF Paragraph 134 bullet e) to Wirral. No weighting, scoring or ranking is offered in the Green Belt Review for site/area selection and the Review lacks a consistent application of the identification and scoring of individual parcels. This removes the justification for exceptional circumstances. The clumping of parcels into large geographic areas is also problematic. It is considered that the Green Belt Review is significantly flawed and leads to 'weakly performing parcel' conclusions that are simply wrong. The assessment process appears to rely on a number of subjective judgements, which are then scored and weighted. The judgements do not appear to be objective based on defined criteria. Therefore the finding of so many Green Belt parcels as 'weakly performing' and suitable for release is misinformed. We believe it was premature to list Green Belt sites without public comment and progression of important issues such as the impact of developing the particular parcels and impacts on heritage assets, leading to misleading conclusions about 'weakly performing' Green Belt land. Green Belt parcels only need to provide one or more purpose to be of value. The Review needs either major corrections or, more simply, redoing. There is public concern that the publication of the Green Belt Review has impacted landowner and tenant aspirations and that land is not being managed for the production of food, as it was previously, as there is now a hope value for residential development. The Council has previously agreed that agricultural land in production should not be considered for release from Green Belt (Oct 2019). It is considered that all sites perform well against the Green Belt purposes. The fact Wirral is a peninsula, and therefore 'exceptional circumstances' do not apply, leads to inappropriate and unsound conclusions. We recommend that the study is improved in advance of Regulation 19, to correct the interpretation the five purposes of Green Belt as set out in NPPF Paragraph 134.						
1248471	LPIO-23971				Parcel 4.8 (SHLAA 1930) - The ARUP assessment of this site on the 5 GB purposes is unaccountably, 'weak'. Given the special features of the local 'countryside', the ancient township (Poulton Lancelyn) context, the established unique, rich history and the unenclosed nature of the site, it is difficult to understand. The ARUP classification procedure is crude and arbitrary. I suggest the only reason Parcel 4.8 was classified as 'weak' is that it was submitted by a developer.	<a href="https://wirral-consult.objective.co.uk/file/5657006">https://wirral-consult.objective.co.uk/file/5657006</a>	<a href="https://wirral-consult.objective.co.uk/file/5656963">https://wirral-consult.objective.co.uk/file/5656963</a>	<a href="https://wirral-consult.objective.co.uk/file/5682447">https://wirral-consult.objective.co.uk/file/5682447</a>	<a href="https://wirral-consult.objective.co.uk/file/5684838">https://wirral-consult.objective.co.uk/file/5684838</a>	<a href="https://wirral-consult.objective.co.uk/file/5655882">https://wirral-consult.objective.co.uk/file/5655882</a>	<a href="https://wirral-consult.objective.co.uk/file/5656957">https://wirral-consult.objective.co.uk/file/5656957</a>
1248471	LPIO-23983				Questions the appointment of ARUP given the views expressed in their blog 'Is Green Belt Policy fit for purpose?' at arup.com/perspectives/is-green-belt-policy-fit-for-purpose, which states: 'Can we solve the UK housing crisis by focussing on brownfield land alone? My view is no...Perhaps a strategic, pan-regional body is needed to assess the role of green belts and their negative impacts?' We are not dealing with a disinterested, neutral observer here which, for some people, may raise questions about ARUP involvement in GB site selection on Wirral. After all, the clearly stated WMBC strategy is to meet all our alleged housing demand on brown field sites. In discussing GB site selection based on the 5 GB purposes the ARUP author also opines; 'We have found the devil is in the detail, yet national policy and guidance provides little more than the bare bones...Even worse the bare bones themselves may be fractured. Are the 5 purposes the most relevant and appropriate concepts for defining green belt in the 21st century, or have our urban areas evolved to such an extent that we need to think again?'	<a href="https://wirral-consult.objective.co.uk/file/5657006">https://wirral-consult.objective.co.uk/file/5657006</a>	<a href="https://wirral-consult.objective.co.uk/file/5656963">https://wirral-consult.objective.co.uk/file/5656963</a>	<a href="https://wirral-consult.objective.co.uk/file/5682447">https://wirral-consult.objective.co.uk/file/5682447</a>	<a href="https://wirral-consult.objective.co.uk/file/5684838">https://wirral-consult.objective.co.uk/file/5684838</a>	<a href="https://wirral-consult.objective.co.uk/file/5655882">https://wirral-consult.objective.co.uk/file/5655882</a>	<a href="https://wirral-consult.objective.co.uk/file/5656957">https://wirral-consult.objective.co.uk/file/5656957</a>
1248472	LPIO-24011				The classification of Green Belt sites is noted however it is material to note that our land along the Dee coast in Heswall (SHLAA 1938, 1939, 1940, 1941, 1967, 1968) is the poorest performing in Green Belt terms when compared to other sites around Heswall and Irby.	<a href="https://wirral-consult.objective.co.uk/file/5684824">https://wirral-consult.objective.co.uk/file/5684824</a>	<a href="https://wirral-consult.objective.co.uk/file/5684823">https://wirral-consult.objective.co.uk/file/5684823</a>				
1247798	LPIO-24232				We do not object to the fact that lower performing parcels are, from a Green Belt purely perspective, the logical sites to release. However, other considerations also need to be taken into account, including technical matters such as highways/access, flood-risk, former uses/contamination, ecology/conservation amongst others, neighbouring uses (i.e. bad neighbour uses), agricultural land classification, and land assembly.	<a href="https://wirral-consult.objective.co.uk/file/5684846">https://wirral-consult.objective.co.uk/file/5684846</a>					
1248142	LPIO-24291				I do not support the idea of any green belt release. I do not agree with a dispersed release of land, a single larger urban extension, nor a hybrid of the two options.	<a href="https://wirral-consult.objective.co.uk/file/5658623">https://wirral-consult.objective.co.uk/file/5658623</a>					
1248142	LPIO-24297				Parcel 5.8 and Parcel 5.9 - We strenuously object to your classification of "weakly performing" green belt on these fields for the reasons set out in our attachment. The description of "Weakly Performing" is totally untrue. The fields provide employment for the local farm, they are put to agricultural use, they provide a green and welcome buffer from the urban sprawl around Moreton and when they were designated Green Belt in 1984, all the land put forward as Green Belt at the time had equal merit in protecting the areas within it. So what has changed? There is no such phrase in the National Planning Policy Framework as "Weakly Performing Green Belt". If the fields were "weakly performing" the land would not have been designated Green Belt in the first instance. The Saughall Massie fields provide a vital belt of green land around a historic village which can prove Anglo Saxon heritage and with our Grade II listed structures, the village serves as an important legacy, reminding us of Wirral's farming communities in much earlier times.	<a href="https://wirral-consult.objective.co.uk/file/5658623">https://wirral-consult.objective.co.uk/file/5658623</a>					
1248463	LPIO-24405		Parcel 6.15	High	We disagree that Parcel 6.15 makes no contribution to purpose 1, because West Kirby is in our view a large urban area and that it makes a 'weak' contribution the purpose 2, as it is the only open space separating Caldy from West Kirby. It makes a strong contribution to purpose 3 and to purpose 5 and is immediately adjacent to Caldy Conservation Area, which has not in our view been properly assessed. We conclude Parcel 6.15 makes a strong contribution to the purposes of the Green Belt and consider the Green Belt Review to be seriously flawed (more detailed comments have been submitted to the Green Belt Review itself).	<a href="https://wirral-consult.objective.co.uk/file/5657858">https://wirral-consult.objective.co.uk/file/5657858</a>					

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1248551	LPIO-24411				It is abundantly clear from the Wirral Green Belt Review 2019 that only a small percentage of land currently designated as Green Belt provides a strong contribution to the purposes of Green Belt. We consider it will likely be necessary to release land from the Green Belt to provide flexibility in the Council's housing supply due to the reliance on large strategic regeneration sites to meet the Council's housing needs. In addition, the Council will also need to mindful of unmet housing and employment needs of neighbouring authorities and may need to consider the need for a further Green Belt Review in agreement with the wider LCR authorities. We reserve the right to comment further on potential Green Belt boundary amendments at later stages of the plan consultation.	<a href="https://wirral-consult.objective.co.uk/file/5655918">https://wirral-consult.objective.co.uk/file/5655918</a>						
1246559 Cheshire Wildlife Trust	LPIO-24552				The green belt appraisal is limited in scope to green belt functionality and consequently the review of land parcels completely fails to encompass the environmental objective of the NPPF (objective c) by not giving it the prominence it should within the appraisal. Because we disagree with the assessment methodology for potential development sites/parcels it is self-evident that the classification of sites will be flawed. Information on statutory and non-statutory sites and ecological networks should be considered in parallel with the green belt review and carry equal weight in the final decision process (or greater weight for statutory sites). Guidance for this is explicitly set out in paragraph 171 of the NPPF that "Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework" Furthermore as set out in paragraph 174 of the NPPF "To protect and enhance biodiversity and geodiversity, plans should: Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation" There is little or no reference to this crucial policy guidance in the green belt review. This is unacceptable (see NPPF paragraph 170a - protecting and enhancing valued landscapes, sites of biodiversity ... in a manner commensurate with their statutory status or identified quality in the development plan). Of the sites suggested for GB release, 3 have major wildlife objections and 5 have wildlife concerns. For "weakly-performing Greenbelt" out of 33 sites there are serious objections on wildlife grounds to 14 and concerns for another 7.							
1245996	LPIO-24585				The parcels identified to carry out the assessment of the importance they play in meeting the 5 purposes of the Green Belt are too large and insufficiently fine-grained to properly assess the contribution that smaller parcels make or do not make to the Green Belt. A more fine-grained assessment would result in different conclusions. For example, our site off Townshend Road, Irby (SHLAA 1980, 1.09ha) is part of the much larger Parcel 7.26, which extends to some 95ha stretching from Heswall to Irby. Overall, this parcel was one of 46 that made a weak contribution to the Green Belt. However, the assessment is inappropriate in relation to assessing the contribution that SHLAA 1980 makes to the Green Belt. It is insufficiently fine grained to have considered it separately from the adjoining expanse of countryside used for arable farming and to the character and use of the land and its durable boundary features. The site is well contained due to the trees and hedges located to the south and west, which would provide a visual buffer from the wider Green Belt, and a long-term defensible urban boundary. Further information is provided in our attachment.	<a href="https://wirral-consult.objective.co.uk/file/5681950">https://wirral-consult.objective.co.uk/file/5681950</a>						
1248588	LPIO-24596				Land at Eastham Hall (SHLAA 4037) has been included within part of a much larger Parcel 4.16, which makes a "moderate contribution" to the purposes of including land in the Green Belt. It is unclear why SHLAA 4037 has not been included within Parcels 4.15 or Parcel 4.18 which include the remainder of Eastham Village. The Green Belt Review concludes that Parcel 4.15 and Parcel 4.18 make a "weak contribution" to the purposes of including land within the Green Belt. The conclusions made about Parcel 4.16 clearly relate to the area of land outside of the village and not to SHLAA 4037, which should be re-considered. It is unclear how all of these Parcels (4.15, 4.16 and 4.18) have been defined as at the Development Options consultation in 2018, the Council identified 48 sites in the Green Belt for "further investigation", which included Eastham Village Conservation Area as one area (SP052). The Summary of the Initial Green Belt Assessment (September 2018) explained that the Eastham Village Conservation Area had been located within the Green Belt since 1983. It set out three potential options under each of which the Conservation Area would have remained in place. Eastham Village Conservation Area should be investigated further as a single parcel as was proposed at the previous consultation. In doing so, regard should be had to paragraph 133 of the NPPF. In this case, the entire village of Eastham is washed over by the Green Belt and openness is reduced by the significant built form that exists within it. Our assessment of the Village as a whole is set out within our attachment. Wirral cannot meet its housing needs without the release of some Green Belt land. Paragraph 138 of the NPPF states that where it has been concluded that it is necessary to release land from the Green Belt for development, plans should give first consideration to land which has been previously developed and / or is well served by public transport. Both of these circumstances apply to Eastham Village Conservation Area (SP052) because much of the village is previously developed and it is also well served by existing bus routes to Chester, Liverpool, Birkenhead and other locations within the Wirral. The openness of Eastham Village Conservation Area is already limited to the amount of development within it. (f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent – this would be the case with Eastham Village Conservation Area, which under options 52.2 or 52.3 in the development options paper would establish a revised Green Belt boundary to the south of the village (option 52.2) or along the M53 boundary (option 52.3). Paragraph 140 of the NPPF is particularly important and the village should be released from the Green Belt.	<a href="https://wirral-consult.objective.co.uk/file/5681617">https://wirral-consult.objective.co.uk/file/5681617</a>						

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1242697	LPIO-24654				Disagree with the assessment of some General Areas and Parcels with which I am familiar. There are flaws in the methodology used in the report. It fails to measure the true openness and value for checking sprawl and fails to measure the contribution from the coherence that a suite of parcels can make. It fails to understand/measure that some parcels have a good value in preserving gaps between settlements/small towns/villages. There are also issues with the use of PPG guidance on the "durable boundary" in examining land against purposes 1 & 3 cited in the NPPF. All Green Belt holds a line against urban sprawl and prevents encroachment but some are better than others by virtue of real boundaries such as rivers and railways from which development is unlikely to proceed. Many so-called clear boundaries are, in fact, fuzzy. Under Purpose 2 of the NPPF (separation), the Review classifies land in a 3-point scale: essential, largely essential, and less essential. There is a substantial gap between the first two categories. Local knowledge and appreciation of the open flat countryside gives a truer view on the contribution to Green Belt purposes of the general areas and many of the constituent parcels. All General Areas and Parcels along a "town/country" boundary support regeneration because the Council has made that a key centre piece in the Local Plan and because every priority in Settlement Areas 2/3 is more valuable for the plan if the Green Belt is not released. The General Areas are not 'weak' but moderate, at least. Some are 'strong' in the sense that their ease of development encourages development away from the urban areas which need regeneration. The General Areas are not the same in size/area. The report (pages 44-45) seeks to allocate an overall score for parcels from the 5 scores on the 5 purposes of Green Belt. While much of the overall allocation is understandable, there are a few combinations of 5 scores which should lead to a different overall assessment. The scoring/categories need more refining to ensure that the "strong" category is not too restrictive to achieve. Further detail is provided in my attachment.	<a href="https://wirral-consult.objective.co.uk/file/5659118">https://wirral-consult.objective.co.uk/file/5659118</a>	<a href="https://wirral-consult.objective.co.uk/file/5659119">https://wirral-consult.objective.co.uk/file/5659119</a>	<a href="https://wirral-consult.objective.co.uk/file/5659120">https://wirral-consult.objective.co.uk/file/5659120</a>	<a href="https://wirral-consult.objective.co.uk/file/5659121">https://wirral-consult.objective.co.uk/file/5659121</a>		
1237546 Wirral Wildlife	LPIO-24743		Parcel 7.28 East and West of Pipers Lane (SP058 C,D,E)		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 LWS), 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. A large part of this parcel is Oldfield Farm, which is high-quality low-environmental impact pasture, some of whose cattle graze Thurstaston Common in summer. Its retention as a farm holding is therefore highly desirable in nature conservation terms.						
1237546 Wirral Wildlife	LPIO-24744		Parcel 4.16 East of Rivacre Road (SP051)		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.						
1237546 Wirral Wildlife	LPIO-24745		Parcel 7.20 Landican infill village (SP065, SP066)		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.						
1237546 Wirral Wildlife	LPIO-24746		Green Belt Study Section 4 Methodology		Overall: We object that too little account has been taken of Local Wildlife Sites. The Appx G Parcel Assessment table of sites includes nationally and internationally important sites – but not Supporting Habitats. It includes TPO woodlands – but not LWS. Given the importance of LWS to nature conservation and as key parts of ecological networks, they are a "beneficial use of Green Belt" and should have been listed in the Appx G Parcel Assessment table. Since the MEAS RAG seems also to have taken little or no account of the LWS system, we feel that the LWS are in danger of being side-lined until too late in the Local Plan process to have any effective influence on it, and that inappropriate Green Belt sites will be selected for possible release. We have spent thousands of expert volunteer hours over 40+ years on surveying and maintaining this LWS system, and object forcefully to these sites being effectively ignored. Individual sites: These are the "weakly-performing" sites that are at most risk of being brought forward if any of the current tranche propose for possible release are withdrawn from consideration. There is still a risk to any Green Belt site, so we stand by our objections raised in the 2018 review, our response to which will be sent to this consultation. Out of the 33 sites, there are serious objections on wildlife grounds to 18, concerns about wildlife impacts for another 5. Note: Buffers: we are demanding 50m wide buffers to Local Wildlife Sites, other priority habitats and watercourses. This is needed to give effective buffering against disturbance and pollution, and possibility of a footpath to divert people from more sensitive habitats. Many UK trees grow to 40m in height (ash even taller) and development must not lead to demands to remove trees because they are within falling distance of new development.						
1237546 Wirral Wildlife	LPIO-24782		Parcel 4.14 West of Rivacre Road (SP050)		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.						
1237546 Wirral Wildlife	LPIO-24783		Parcel 5.7 East of Garden Hey Road, Saughall Massie (SP005A)		There are reports of wintering and breeding birds, which need further study.						

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1237546 Wirral Wildlife	LPIO-24784		Parcel 4.1 North of Lever Causeway (SPO30)		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.						
1237546 Wirral Wildlife	LPIO-24785		Parcel 5.14 east of Rigby Drive, Greasby (SPO10)		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) 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; and 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.						
1237546 Wirral Wildlife	LPIO-24786		Parcel 6.9 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.						
1237546 Wirral Wildlife	LPIO-24787		Parcel 7.22 East of Glenwood Drive Irby (SPO19B)		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.						

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1237546 Wirral Wildlife	LPIO-24788		Parcel 7.22 East of Glenwood Drive Irby (SP019B)		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 Arrove 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 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 covers 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.						
1237546 Wirral Wildlife	LPIO-24789		Parcel 4.1 West of Landican Lane Storeton (SP031)		[parcel ref corrected from 4.2] 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.						
1237546 Wirral Wildlife	LPIO-24790		Parcel 4.1 Little Storeton (SP032)		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.						
1237546 Wirral Wildlife	LPIO-24791		Parcel 4.2 North of Rest Hill Road (SP033)		[Parcel ref corrected from 4.3] 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. We are not 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.						

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1237546 Wirral Wildlife	LPIO-24792		Parcel 4.3 North of Red Hill Road (SP036)		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) 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; and; 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.						
1237546 Wirral Wildlife	LPIO-24793		East of Brimstage Lane (SP037)		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 Umbertson 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; and, checking of the several ponds present for Great Crested Newts, which have been found in recent years on Brackenwood Golf Course western section.						
1237546 Wirral Wildlife	LPIO-24794		West of Brimstage Lane (SP041)		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.						
1237546 Wirral Wildlife	LPIO-24795 1 of 2		Parcel 4.7 North of Poulton Hall Road (SP042)		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 Clarendon Farm. 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.						



Person ID	ID	Question 2.16 - Do you agree with the classification of sites set out within the 2019 Green Belt Review?	Site number / Reference:	Question 2.16b - Suggested alternative classification (please select):	Question 2.16c - Please give your reasons below. (If you don't agree with the Green Belt Review Methodology you can comment in the separate evidence consultation)	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6	
1237546 Wirral Wildlife	LPIO-24795 2 of 2		Parcel 4.7 North of Poulton Hall Road (SP042)		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 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. 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.							
1237546 Wirral Wildlife	LPIO-24796		Parcel 5.8, 5.9 North of Saughall Massie Conservation Area (SP004A,4B)		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].							
1248749	LPIO-24819				Agree with the Council's classification of sites within the 2019 Green Belt Review and the assessment of the 46 sites which make a weak contribution to the Green Belt. However, we would encourage a more thorough investigation of other Green Belt sites based on the assessment of individual SHLAA sites and not just strategic parcels. There are further Green Belt sites which would be appropriate for development which have been overlooked because they have been assessed as part of a larger strategic parcel rather than as an individual site. An extra step should have been implemented to assess sites being actively promoted by a developer, to ensure that assessments would only be taking place on deliverable sites.	<a href="https://wirral-consult.objective.co.uk/file/5684847">https://wirral-consult.objective.co.uk/file/5684847</a>	<a href="https://wirral-consult.objective.co.uk/file/5684848">https://wirral-consult.objective.co.uk/file/5684848</a>	<a href="https://wirral-consult.objective.co.uk/file/5684845">https://wirral-consult.objective.co.uk/file/5684845</a>				
1248749	LPIO-24820				Land at SHLAA 1880 at Roman Road, Prenton in Green Belt Parcel 4.1 is not perceptible from other publicly accessible areas within the Green Belt to the south of the site and would integrate well with the urban fringes of Prenton. The removal of the site from the Green Belt would not affect any of its primary purposes as set out in the NPPF 2019, paragraph 134. The site is visually contained by strong defensible boundaries of mature trees and hedgerows to the south and east and physically contained by surrounding development within Prenton and by Prenton golf course which borders southern and eastern site boundaries. The site has no intervisibility with other parts of the Green Belt nor from other surrounding settlements. Encroachment into the countryside would be prevented through the presence of surrounding land uses and further enhanced by landscape mitigation around the periphery of the site. The site does not contain the same characteristics of the rest of the Green Belt Parcel, being physically and visually separated from the surrounding landscape to the south and is already heavily influenced by its context located on all surrounding site boundaries.	<a href="https://wirral-consult.objective.co.uk/file/5684847">https://wirral-consult.objective.co.uk/file/5684847</a>	<a href="https://wirral-consult.objective.co.uk/file/5684848">https://wirral-consult.objective.co.uk/file/5684848</a>	<a href="https://wirral-consult.objective.co.uk/file/5684845">https://wirral-consult.objective.co.uk/file/5684845</a>				
1248769	LPIO-24942				Agree with the Council's classification of sites within the 2019 Green Belt Review and the assessment of the 46 sites which make a weak contribution to the Green Belt. However, we would encourage a more thorough investigation of other Green Belt sites based on the assessment of individual SHLAA sites and not just strategic parcels. There are further Green Belt sites which would be appropriate for development which have been overlooked because they have been assessed as part of a larger strategic parcel rather than as an individual site. An extra step should have been implemented to assess sites being actively promoted by a developer, to ensure that assessments would only be taking place on deliverable sites.	<a href="https://wirral-consult.objective.co.uk/file/5659045">https://wirral-consult.objective.co.uk/file/5659045</a>	<a href="https://wirral-consult.objective.co.uk/file/5684957">https://wirral-consult.objective.co.uk/file/5684957</a>	<a href="https://wirral-consult.objective.co.uk/file/5659039">https://wirral-consult.objective.co.uk/file/5659039</a>	<a href="https://wirral-consult.objective.co.uk/file/5659038">https://wirral-consult.objective.co.uk/file/5659038</a>	<a href="https://wirral-consult.objective.co.uk/file/5684956">https://wirral-consult.objective.co.uk/file/5684956</a>		
1248823	LPIO-25044				Agree with the Council's classification of sites within the 2019 Green Belt Review and the assessment of the 46 sites which make a weak contribution to the Green Belt. However, we would encourage a more thorough investigation of other Green Belt sites based on the assessment of individual SHLAA sites and not just strategic parcels. There are further Green Belt sites which would be appropriate for development which have been overlooked because they have been assessed as part of a larger strategic parcel rather than as an individual site. An extra step should have been implemented to assess sites being actively promoted by a developer, to ensure that assessments would only be taking place on deliverable sites.	<a href="https://wirral-consult.objective.co.uk/file/5674317">https://wirral-consult.objective.co.uk/file/5674317</a>	<a href="https://wirral-consult.objective.co.uk/file/5684865">https://wirral-consult.objective.co.uk/file/5684865</a>	<a href="https://wirral-consult.objective.co.uk/file/5684849">https://wirral-consult.objective.co.uk/file/5684849</a>				
1248832	LPIO-25195				Agree with the Council's classification of sites within the 2019 Green Belt Review and the assessment of the 46 sites which make a weak contribution to the Green Belt. However, we would encourage a more thorough investigation of other Green Belt sites based on the assessment of individual SHLAA sites and not just strategic parcels. There are further Green Belt sites which would be appropriate for development which have been overlooked because they have been assessed as part of a larger strategic parcel rather than as an individual site. An extra step should have been implemented to assess sites being actively promoted by a developer, to ensure that assessments would only be taking place on deliverable sites.	<a href="https://wirral-consult.objective.co.uk/file/5684857">https://wirral-consult.objective.co.uk/file/5684857</a>	<a href="https://wirral-consult.objective.co.uk/file/5659562">https://wirral-consult.objective.co.uk/file/5659562</a>					
1248833	LPIO-25258				Agree with the Council's classification of sites within the 2019 Green Belt Review and the assessment of the 46 sites which make a weak contribution to the Green Belt. However, we would encourage a more thorough investigation of other Green Belt sites based on the assessment of individual SHLAA sites and not just strategic parcels. There are further Green Belt sites which would be appropriate for development which have been overlooked because they have been assessed as part of a larger strategic parcel rather than as an individual site. An extra step should have been implemented to assess sites being actively promoted by a developer, to ensure that assessments would only be taking place on deliverable sites.	<a href="https://wirral-consult.objective.co.uk/file/5661125">https://wirral-consult.objective.co.uk/file/5661125</a>	<a href="https://wirral-consult.objective.co.uk/file/5661100">https://wirral-consult.objective.co.uk/file/5661100</a>	<a href="https://wirral-consult.objective.co.uk/file/5661124">https://wirral-consult.objective.co.uk/file/5661124</a>	<a href="https://wirral-consult.objective.co.uk/file/5661129">https://wirral-consult.objective.co.uk/file/5661129</a>			

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1237647	LPIO-253	no			I am very worried by the subjective nature of the classification of Green-belt sites. Once sites are lost it is almost impossible to reclaim them, and classifying any site as making only a "weak contribution" devalues the whole idea of the Green Belt and encourages piecemeal dismemberment.						
1248956	LPIO-25358		Parcel 6.10 (SHLAA 1943)	High	Largely agree with the Council's classification of sites within the 2019 Green Belt Review and the assessment of the sites which make a weak contribution to the Green Belt but consider that part of Parcel 6.10 (SHLAA 1943), to the north of Saughall Massie Road, West Kirby does not make a strong contribution to the Green Belt and disagree with the findings with regards to purpose 3 and 5. SHLAA 1943, which forms only a small part of Green Belt Parcel 6.10, cannot be regarded as being a particularly sensitive parcel of open countryside in terms of purpose 3. The site does not significantly contribute toward access to the open countryside and development could be used to enhance the outer edge of West Kirby and offer biodiversity benefits and landscape renewal. The existing urban edge along Gilroy Road is weak and highly visible and there is no sense of being within a remote part of the open countryside. While most Green Belt sites will contribute to purpose 5 in some manner, Green Belt release at West Kirby compared to the release of Green Belt at the Commercial Core will have differing impacts on urban regeneration. To rank each parcel as exactly the same in relation to purpose 5 is inaccurate and incomplete. As there is very little previously developed land within West Kirby, the site provides a weak contribution to purpose 5 of Green Belt.	<a href="https://wirral-consult.objective.co.uk/file/5684859">https://wirral-consult.objective.co.uk/file/5684859</a>	<a href="https://wirral-consult.objective.co.uk/file/5677475">https://wirral-consult.objective.co.uk/file/5677475</a>				
1248956	LPIO-25359				The Green Belt Review needs to consider the site at Column Road site afresh (Parcel 6.15) on the basis of the resulting Green Belt boundary, for the smaller area now identified for release.	<a href="https://wirral-consult.objective.co.uk/file/5684859">https://wirral-consult.objective.co.uk/file/5684859</a>	<a href="https://wirral-consult.objective.co.uk/file/5677475">https://wirral-consult.objective.co.uk/file/5677475</a>				
1248986	LPIO-25454				Agree with the Council's classification of sites within the 2019 Green Belt Review and the assessment of the 46 sites which make a weak contribution to the Green Belt. However, we would encourage a more thorough investigation of other Green Belt sites based on the assessment of individual SHLAA sites and not just strategic parcels. There are further Green Belt sites which would be appropriate for development which have been overlooked because they have been assessed as part of a larger strategic parcel rather than as an individual site. An extra step should have been implemented to assess sites being actively promoted by a developer, to ensure that assessments would only be taking place on deliverable sites.	<a href="https://wirral-consult.objective.co.uk/file/5662723">https://wirral-consult.objective.co.uk/file/5662723</a>	<a href="https://wirral-consult.objective.co.uk/file/5662725">https://wirral-consult.objective.co.uk/file/5662725</a>	<a href="https://wirral-consult.objective.co.uk/file/5662770">https://wirral-consult.objective.co.uk/file/5662770</a>			
1237546 Wirral Wildlife	LPIO-2548	no			Wirral Wildlife do not agree with the Green Belt sites classification because: 1) only the legal tests have been used 2) Local Wildlife Sites (=Sites of Biological Importance) have not been adequately taken into consideration in the Green Belt review or MEAS RAG review. 3) the low sustainability of any greenfield building has not been adequately taken into account. 4) the biodiversity value of Green Belt land has been underestimated. 5) there are no exceptional circumstances to justify Green Belt release, especially now national housing need figures have been recalculated downwards (ONS 2018) 6) The Green Infrastructure review has not been completed, indeed is barely started, so has not been taken into account. Therefore green corridors, ecosystem services, etc have not been fully identified. 7) no consideration has been given to the effects of introducing noise, light and other disturbance into quiet zones. Full justification attached.	<a href="https://wirral-consult.objective.co.uk/file/5676764">https://wirral-consult.objective.co.uk/file/5676764</a>					
1243721	LPIO-2564	no			The assessment of much of the Wirral Green Belt as 'weakly performing' is unsound. All Green Belt areas should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. Allowing development of Green Belt will encourage developers to take an easy option, and adversely affect the regeneration process.						
1249070	LPIO-25649		Parcel 4.1	Moderate	We have significant concerns regarding the overall scope of the 2019 Green Belt Review and the failure to carry out any assessment relating to the washed-over village of Storeton, which is contained within three parcels (4.1, 4.2 and 4.3), with the southern part of the village not assessed at all. There has been a significant change in policy on the treatment of villages in the Green Belt since the Green Belt boundary was last reviewed in the out-of-date Unitary Development Plan, of such significance that it amounts to an exceptional circumstance to justify a review of Green Belt boundaries, which has been considered at other Local Plan examinations, for example, at Guildford. In our view, Storeton does not have an open character, with few gaps between properties and a sense of being within a village. As such, the village makes a very limited or no contribution to the openness of the Green Belt and has limited connectivity to the open countryside. In accordance with NPPF paragraph 140, which has not been referred to within the Review, it should be inset. Given the strong durable boundaries, the inset village boundary should include land east of Landican Lane. The parcels identified in the assessment in relation to the land east of Landican Lane are inappropriate and do not accord with the methodology set out in the 2019 Green Belt Review. Parcel 4.1 crosses strong durable boundaries in the form of highways infrastructure. Based on the methodology, a separate parcel should be identified relating to the land east of Landican Lane. Further information on our assessment, including the character of Storeton Village, the contribution of land to the east of Landican Lane, and a suggested village inset boundary, is provided in our attachments.	<a href="https://wirral-consult.objective.co.uk/file/5684896">https://wirral-consult.objective.co.uk/file/5684896</a>	<a href="https://wirral-consult.objective.co.uk/file/5679650">https://wirral-consult.objective.co.uk/file/5679650</a>				
1249070	LPIO-25651		Parcel 4.1	Moderate	The evidence base considers individual sites or parcels which are not representative of land promoted for development.	<a href="https://wirral-consult.objective.co.uk/file/5684896">https://wirral-consult.objective.co.uk/file/5684896</a>	<a href="https://wirral-consult.objective.co.uk/file/5679650">https://wirral-consult.objective.co.uk/file/5679650</a>				
1246458	LPIO-25703				I do not agree with the classification of weakly performing parcels or settlements. Agricultural land MUST be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1246459	LPIO-25704				I do not agree with the classification of weakly performing parcels or settlements. Agricultural land MUST be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						

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1249100	LPIO-25870 1 of 3		Parcel 5.11 (SHLAA 3003)	Weak	Agree that Green Belt Parcel 5.11 (SHLAA 3003), to the north of Greasby, is a weak performing parcel, making no contribution to Green Belt purpose 1 (sprawl) and purpose 4 (preserving historic towns) and a weak contribution to purpose 2 (merging). But consider that the site also makes weak (not a moderate) contribution to purpose 3 (encroachment), as the site serves little function as countryside, has limited openness, has strong, defensible boundaries on all sides and is well contained. The sense of being in the open countryside is limited by the presence of neighbouring urban built form; by limited views of the wider countryside, curtailed by screening from the dense hedges that break up the site; and encroachment already exists in the form of the on-site equestrian centre. The southern and eastern boundaries are formed by the rear gardens of existing residential homes, which are evidently visible and not robust. Saughall Massie Road is also a very strong and durable boundary that would prevent further encroachment in the longer term and prevent the merger of settlements. Alternatively, Greasby Brook and Arrowe Brook, which are both located further south within the site, could be used to define the Green Belt boundary, with land beyond, up to Saughall Massie Road retained as protected open space.	<a href="https://wirral-consult.objective.co.uk/file/5684951">https://wirral-consult.objective.co.uk/file/5684951</a>	<a href="https://wirral-consult.objective.co.uk/file/5677510">https://wirral-consult.objective.co.uk/file/5677510</a>	<a href="https://wirral-consult.objective.co.uk/file/5684895">https://wirral-consult.objective.co.uk/file/5684895</a>	<a href="https://wirral-consult.objective.co.uk/file/5677508">https://wirral-consult.objective.co.uk/file/5677508</a>	<a href="https://wirral-consult.objective.co.uk/file/5677511">https://wirral-consult.objective.co.uk/file/5677511</a>	
1249100	LPIO-25870 2 of 3		Parcel 5.11 (SHLAA 3003)	Weak	Agree that Green Belt Parcel 5.11 (SHLAA 3003), to the north of Greasby, is a weak performing parcel, making no contribution to Green Belt purpose 1 (sprawl) and purpose 4 (preserving historic towns) and a weak contribution to purpose 2 (merging). But consider that the site also makes weak (not a moderate) contribution to purpose 3 (encroachment), as the site serves little function as countryside, has limited openness, has strong, defensible boundaries on all sides and is well contained. The sense of being in the open countryside is limited by the presence of neighbouring urban built form; by limited views of the wider countryside, curtailed by screening from the dense hedges that break up the site; and encroachment already exists in the form of the on-site equestrian centre. The southern and eastern boundaries are formed by the rear gardens of existing residential homes, which are evidently visible and not robust. Saughall Massie Road is also a very strong and durable boundary that would prevent further encroachment in the longer term and prevent the merger of settlements. Alternatively, Greasby Brook and Arrowe Brook, which are both located further south within the site, could be used to define the Green Belt boundary, with land beyond, up to Saughall Massie Road retained as protected open space.	<a href="https://wirral-consult.objective.co.uk/file/5677514">https://wirral-consult.objective.co.uk/file/5677514</a>	<a href="https://wirral-consult.objective.co.uk/file/5677512">https://wirral-consult.objective.co.uk/file/5677512</a>	<a href="https://wirral-consult.objective.co.uk/file/5684898">https://wirral-consult.objective.co.uk/file/5684898</a>	<a href="https://wirral-consult.objective.co.uk/file/5684949">https://wirral-consult.objective.co.uk/file/5684949</a>	<a href="https://wirral-consult.objective.co.uk/file/5677509">https://wirral-consult.objective.co.uk/file/5677509</a>	
1249100	LPIO-25870 3 of 3		Parcel 5.11 (SHLAA 3003)	Weak	Agree that Green Belt Parcel 5.11 (SHLAA 3003), to the north of Greasby, is a weak performing parcel, making no contribution to Green Belt purpose 1 (sprawl) and purpose 4 (preserving historic towns) and a weak contribution to purpose 2 (merging). But consider that the site also makes weak (not a moderate) contribution to purpose 3 (encroachment), as the site serves little function as countryside, has limited openness, has strong, defensible boundaries on all sides and is well contained. The sense of being in the open countryside is limited by the presence of neighbouring urban built form; by limited views of the wider countryside, curtailed by screening from the dense hedges that break up the site; and encroachment already exists in the form of the on-site equestrian centre. The southern and eastern boundaries are formed by the rear gardens of existing residential homes, which are evidently visible and not robust. Saughall Massie Road is also a very strong and durable boundary that would prevent further encroachment in the longer term and prevent the merger of settlements. Alternatively, Greasby Brook and Arrowe Brook, which are both located further south within the site, could be used to define the Green Belt boundary, with land beyond, up to Saughall Massie Road retained as protected open space.	<a href="https://wirral-consult.objective.co.uk/file/5677513">https://wirral-consult.objective.co.uk/file/5677513</a>	<a href="https://wirral-consult.objective.co.uk/file/5677516">https://wirral-consult.objective.co.uk/file/5677516</a>	<a href="https://wirral-consult.objective.co.uk/file/5677507">https://wirral-consult.objective.co.uk/file/5677507</a>			
1249100	LPIO-25871 1 of 3				Ranking each parcel as exactly the same under purpose 5 (assisting urban regeneration) is inaccurate and incomplete. In Wirral, a site at the edge of the Commercial Core is likely to have a far greater impact on regeneration than a site in Mid-Wirral, where there is no urban land left available and the housing market is different. Only seven small sites are proposed to be allocated in Mid-Wirral. These other issues should be factored in before coming to any final conclusion.	<a href="https://wirral-consult.objective.co.uk/file/5677514">https://wirral-consult.objective.co.uk/file/5677514</a>	<a href="https://wirral-consult.objective.co.uk/file/5677512">https://wirral-consult.objective.co.uk/file/5677512</a>	<a href="https://wirral-consult.objective.co.uk/file/5684898">https://wirral-consult.objective.co.uk/file/5684898</a>	<a href="https://wirral-consult.objective.co.uk/file/5684949">https://wirral-consult.objective.co.uk/file/5684949</a>	<a href="https://wirral-consult.objective.co.uk/file/5677509">https://wirral-consult.objective.co.uk/file/5677509</a>	
1249100	LPIO-25871 2 of 3				Ranking each parcel as exactly the same under purpose 5 (assisting urban regeneration) is inaccurate and incomplete. In Wirral, a site at the edge of the Commercial Core is likely to have a far greater impact on regeneration than a site in Mid-Wirral, where there is no urban land left available and the housing market is different. Only seven small sites are proposed to be allocated in Mid-Wirral. These other issues should be factored in before coming to any final conclusion.	<a href="https://wirral-consult.objective.co.uk/file/5684951">https://wirral-consult.objective.co.uk/file/5684951</a>	<a href="https://wirral-consult.objective.co.uk/file/5677510">https://wirral-consult.objective.co.uk/file/5677510</a>	<a href="https://wirral-consult.objective.co.uk/file/5684895">https://wirral-consult.objective.co.uk/file/5684895</a>	<a href="https://wirral-consult.objective.co.uk/file/5677508">https://wirral-consult.objective.co.uk/file/5677508</a>	<a href="https://wirral-consult.objective.co.uk/file/5677511">https://wirral-consult.objective.co.uk/file/5677511</a>	
1249100	LPIO-25871 3 of 3				Ranking each parcel as exactly the same under purpose 5 (assisting urban regeneration) is inaccurate and incomplete. In Wirral, a site at the edge of the Commercial Core is likely to have a far greater impact on regeneration than a site in Mid-Wirral, where there is no urban land left available and the housing market is different. Only seven small sites are proposed to be allocated in Mid-Wirral. These other issues should be factored in before coming to any final conclusion.	<a href="https://wirral-consult.objective.co.uk/file/5677513">https://wirral-consult.objective.co.uk/file/5677513</a>	<a href="https://wirral-consult.objective.co.uk/file/5677516">https://wirral-consult.objective.co.uk/file/5677516</a>	<a href="https://wirral-consult.objective.co.uk/file/5677507">https://wirral-consult.objective.co.uk/file/5677507</a>			
1249116	LPIO-25924 1 of 3		SHLAA1982 GB parcel 7.14	Moderate	SHLAA 1982 to the north of Whitehouse Lane, Barnston should have been assessed in isolation rather than as part of the wider Parcel 7.14, which includes a much larger swathe of land to the north and east. The site has been promoted for several years with numerous representations made throughout the plan preparation process. The overall conclusion that the wider parcel makes an overall moderate contribution, does not apply to SHLAA 1982. Our assessment of the site in isolation against each of the five Green Belt purposes, attached, concludes that it makes an overall weak contribution to the five purposes of the Green Belt. SHLAA 1982 comprises a well-contained parcel of land, with logical, physical and defensible durable boundaries. Mature trees and hedgerows bound the site in all directions and the existing northern boundary could be enhanced with substantial landscape planting to further increase the durability of the northern boundary. Development would not result in the coalescence of neighbouring towns and Barnston would remain 0.6km to the north and would form a natural extension to the urban area. The nearest Listed Building and Barnston Conservation Area would not be impacted and there is insufficient previously developed land in the Borough to accommodate its future housing requirements.	<a href="https://wirral-consult.objective.co.uk/file/5674092">https://wirral-consult.objective.co.uk/file/5674092</a>	<a href="https://wirral-consult.objective.co.uk/file/5674093">https://wirral-consult.objective.co.uk/file/5674093</a>	<a href="https://wirral-consult.objective.co.uk/file/5674095">https://wirral-consult.objective.co.uk/file/5674095</a>			

Person ID	ID	Question 2.16 - Do you agree with the classification of sites set out within the 2019 Green Belt Review?	Site number / Reference:	Question 2.16b - Suggested alternative classification (please select):	Question 2.16c - Please give your reasons below. (If you don't agree with the Green Belt Review Methodology you can comment in the separate evidence consultation)	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6
1249116	LPIO-25924 2 of 3		SHLAA1982 GB parcel 7.14	Moderate	SHLAA 1982 to the north of Whitehouse Lane, Barnston should have been assessed in isolation rather than as part of the wider Parcel 7.14, which includes a much larger swathe of land to the north and east. The site has been promoted for several years with numerous representations made throughout the plan preparation process. The overall conclusion that the wider parcel makes an overall moderate contribution, does not apply to SHLAA 1982. Our assessment of the site in isolation against each of the five Green Belt purposes, attached, concludes that it makes an overall weak contribution to the five purposes of the Green Belt. SHLAA 1982 comprises a well-contained parcel of land, with logical, physical and defensible durable boundaries. Mature trees and hedgerows bound the site in all directions and the existing northern boundary could be enhanced with substantial landscape planting to further increase the durability of the northern boundary. Development would not result in the coalescence of neighbouring towns and Barnston would remain 0.6km to the north and would form a natural extension to the urban area. The nearest Listed Building and Barnston Conservation Area would not be impacted and there is insufficient previously developed land in the Borough to accommodate its future housing requirements.	<a href="https://wirral-consult.objective.co.uk/file/5674096">https://wirral-consult.objective.co.uk/file/5674096</a>	<a href="https://wirral-consult.objective.co.uk/file/5684833">https://wirral-consult.objective.co.uk/file/5684833</a>	<a href="https://wirral-consult.objective.co.uk/file/5684836">https://wirral-consult.objective.co.uk/file/5684836</a>			
1249116	LPIO-25962 1 OF 2		SHLAA0740 Option 2A GB parcel 5.8 – land west side of Saughall Road	Weak	We support the identification of Parcel 5.8 at Saughall Massie and the Council's assessment that the site makes a weak overall contribution to the five purposes of the Green Belt but our own assessment, set out in our attachments, is that the site makes a weak contribution under all five Green Belt purposes (not a moderate contribution to two and no contribution to three purposes). It would provide a natural and well contained extension to the urban area, has defensible boundaries on all sides, would not result in the coalescence of neighbouring towns, has a clear physical and visual separation from the Green Belt, would not intrude discordantly into the open countryside, a sensitively designed housing development would not adversely impact on the surrounding setting or character of Saughall Massie Conservation Area, and there is insufficient previously developed land in the Borough to accommodate future housing requirements.	<a href="https://wirral-consult.objective.co.uk/file/5675698">https://wirral-consult.objective.co.uk/file/5675698</a>	<a href="https://wirral-consult.objective.co.uk/file/5675693">https://wirral-consult.objective.co.uk/file/5675693</a>	<a href="https://wirral-consult.objective.co.uk/file/5675700">https://wirral-consult.objective.co.uk/file/5675700</a>	<a href="https://wirral-consult.objective.co.uk/file/5675692">https://wirral-consult.objective.co.uk/file/5675692</a>		
1249116	LPIO-25962 2 OF 2		SHLAA0740 Option 2A GB parcel 5.8 – land west side of Saughall Road	Weak	We support the identification of Parcel 5.8 at Saughall Massie and the Council's assessment that the site makes a weak overall contribution to the five purposes of the Green Belt but our own assessment, set out in our attachments, is that the site makes a weak contribution under all five Green Belt purposes (not a moderate contribution to two and no contribution to three purposes). It would provide a natural and well contained extension to the urban area, has defensible boundaries on all sides, would not result in the coalescence of neighbouring towns, has a clear physical and visual separation from the Green Belt, would not intrude discordantly into the open countryside, a sensitively designed housing development would not adversely impact on the surrounding setting or character of Saughall Massie Conservation Area, and there is insufficient previously developed land in the Borough to accommodate future housing requirements.	<a href="https://wirral-consult.objective.co.uk/file/5675697">https://wirral-consult.objective.co.uk/file/5675697</a>	<a href="https://wirral-consult.objective.co.uk/file/5675694">https://wirral-consult.objective.co.uk/file/5675694</a>	<a href="https://wirral-consult.objective.co.uk/file/5675696">https://wirral-consult.objective.co.uk/file/5675696</a>			
1249116	LPIO-25964 1 OF 2		SHLAA 0925 Parcel 5.9	Weak	We support the identification of Parcel 5.9 at Saughall Massie and the Council's assessment that the site makes a weak overall contribution to the five purposes of the Green Belt but our own assessment, set out in our attachments, is that the site makes a weak contribution under all five Green Belt purposes (not a moderate contribution to one, a weak contribution to one and no contribution to three purposes). It would provide a natural and well contained extension to the urban area, has defensible boundaries on all sides, would not result in the coalescence of neighbouring towns, has a clear physical and visual separation from the Green Belt, would not intrude discordantly into the open countryside, a sensitively designed housing development would not adversely impact on the surrounding setting or character of Saughall Massie Conservation Area, and there is insufficient previously developed land in the Borough to accommodate future housing requirements.	<a href="https://wirral-consult.objective.co.uk/file/5675698">https://wirral-consult.objective.co.uk/file/5675698</a>	<a href="https://wirral-consult.objective.co.uk/file/5675693">https://wirral-consult.objective.co.uk/file/5675693</a>	<a href="https://wirral-consult.objective.co.uk/file/5675700">https://wirral-consult.objective.co.uk/file/5675700</a>	<a href="https://wirral-consult.objective.co.uk/file/5675692">https://wirral-consult.objective.co.uk/file/5675692</a>		
1249116	LPIO-25964 2 OF 2		SHLAA 0925 Parcel 5.9	Weak	We support the identification of Parcel 5.9 at Saughall Massie and the Council's assessment that the site makes a weak overall contribution to the five purposes of the Green Belt but our own assessment, set out in our attachments, is that the site makes a weak contribution under all five Green Belt purposes (not a moderate contribution to one, a weak contribution to one and no contribution to three purposes). It would provide a natural and well contained extension to the urban area, has defensible boundaries on all sides, would not result in the coalescence of neighbouring towns, has a clear physical and visual separation from the Green Belt, would not intrude discordantly into the open countryside, a sensitively designed housing development would not adversely impact on the surrounding setting or character of Saughall Massie Conservation Area, and there is insufficient previously developed land in the Borough to accommodate future housing requirements.	<a href="https://wirral-consult.objective.co.uk/file/5675697">https://wirral-consult.objective.co.uk/file/5675697</a>	<a href="https://wirral-consult.objective.co.uk/file/5675694">https://wirral-consult.objective.co.uk/file/5675694</a>	<a href="https://wirral-consult.objective.co.uk/file/5675696">https://wirral-consult.objective.co.uk/file/5675696</a>			
1249116	LPIO-26025		SHLAA1932 Option 2A GB parcel 7.27 – land south of Irby	Weak	We support the Council's assessment that Parcel 7.27, at Irby makes a weak overall contribution to the five purposes of the Green Belt. Our own assessment of SHLAA 1932, set out in our attachments, which is part of Parcel 7.27, is that SHLAA 1932 makes a weak contribution under all five Green Belt purposes, as it forms a highly enclosed, logical self-contained area that would provide a natural extension to the urban area, bounded by established residential uses and the Irby Village Centre, with durable boundaries. Development of SHLAA 1932 would not result in the coalescence of the distinct settlements of Irby and Pensby/Thingwall, as Arrowe Brook valley and Harrock Wood would provide a clearly delineated Green Belt boundary, will pose no risk of encroachment into the countryside, would not adversely impact on the surrounding setting or character of the area, and there is currently insufficient previously developed land in the Borough to accommodate its future housing requirements.	<a href="https://wirral-consult.objective.co.uk/file/5684802">https://wirral-consult.objective.co.uk/file/5684802</a>	<a href="https://wirral-consult.objective.co.uk/file/5684835">https://wirral-consult.objective.co.uk/file/5684835</a>	<a href="https://wirral-consult.objective.co.uk/file/5677041">https://wirral-consult.objective.co.uk/file/5677041</a>	<a href="https://wirral-consult.objective.co.uk/file/5677037">https://wirral-consult.objective.co.uk/file/5677037</a>	<a href="https://wirral-consult.objective.co.uk/file/5684804">https://wirral-consult.objective.co.uk/file/5684804</a>	
1249116	LPIO-26059				SHLAA 1819 at Lever Causeway should have been assessed in isolation rather than as part of the wider Parcel 4.1, which includes a much larger swathe of land to the north and east. The site has been promoted for several years with numerous representations made throughout the plan preparation process. The overall conclusion that the wider parcel makes an overall moderate contribution, does not apply to SHLAA 1819. Our assessment of the site in isolation against each of the five Green Belt purposes, attached, concludes that it makes an overall weak contribution to the five purposes of the Green Belt. The site is a self-contained, logical extension to the existing urban area, contained by a strong local landscape framework and a strong visual and physical boundary to the south of the site along Lever Causeway and at Marsh Hey Covert, which provides a significant degree of screening from the open Green Belt. The development of the site would not result in a significant incursion into the Green Belt. A distance of 0.7km would be maintained between the site and Storeton. It would not result in the coalescence of the wider Birkenhead urban area with infill settlements including Storeton and the Heswall urban area further to the west of the Peninsula. A sensitively designed housing development would not adversely impact on the surrounding setting and character of the area including the Mount Wood Conservation Area and there is insufficient previously developed land in the Borough to accommodate its future housing requirements.	<a href="https://wirral-consult.objective.co.uk/file/5674240">https://wirral-consult.objective.co.uk/file/5674240</a>	<a href="https://wirral-consult.objective.co.uk/file/5684832">https://wirral-consult.objective.co.uk/file/5684832</a>	<a href="https://wirral-consult.objective.co.uk/file/5674256">https://wirral-consult.objective.co.uk/file/5674256</a>	<a href="https://wirral-consult.objective.co.uk/file/5684834">https://wirral-consult.objective.co.uk/file/5684834</a>	<a href="https://wirral-consult.objective.co.uk/file/5684837">https://wirral-consult.objective.co.uk/file/5684837</a>	

Person ID	ID	Question 2.16 - Do you agree with the classification of sites set out within the 2019 Green Belt Review?	Site number / Reference:	Question 2.16b - Suggested alternative classification (please select):	Question 2.16c - Please give your reasons below. (If you don't agree with the Green Belt Review Methodology you can comment in the separate evidence consultation)	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6
1244896	LPIO-2607	no	7.27 (SP060) Land between Irby and Pensby (plus all others)	High	Definitely NO. The Green Belt Review + Site and Parcel classifications are flawed and 'unsound'. The methodology and results have been commented upon under LP Evidence Base – Green Belt Review 2019. Please include those comments here. Files attached to LP Evidence Base – GB Review 2019 comments are attached here. For a Site/Parcel's contribution to be classified 'strong' or 'high' can need just one GB Purpose to be contravened – it is NOT an averaging process. For Site 7.27, selection/classification would contravene Purpose 1 (Sprawl) by adding Irby to the existing large built-up, separate area of Thingwall, Pensby and Heswall; Purpose 2 (Merge) by merging the distinct communities of Irby, Thingwall and Pensby; Purpose 3 (Encroachment) as the site is so large (1.25km x 1km) that it appears to be open countryside – also a 'green corridor' with ancient woodland, medieval land formation and vulnerable nature; Purpose 4 (Historic Setting) as Irby is an ancient and historic settlement with known Heritage assets including related to the Battle of Brunanburh (see submitted paper by Prof David Gregg); and Purpose 5 (Assist Regeneration) where attached documents show the unique relevance of Purpose 5 to Wirral - to say all GB does this is to misunderstand the special situation here and the 'exceptional circumstances'. In addition, there are the aspects of Character and Harm that have not been taken into account at all and should be. Irby is a semi-rural village; Thingwall and Pensby are large dormitory towns with their own community and shopping centres. Similar comments apply to all 12 Option 2A Sites, all 4 Option 2B Sites and all other Sites classified as 'weakly performing'. Read with the ITPAS DOR Consultation 2018 Response provided to Forward Planning, most of which remains relevant to this Consultation.	<a href="https://wirral-consult.objective.co.uk/file/5677238">https://wirral-consult.objective.co.uk/file/5677238</a>					
1244896	LPIO-2610	no	Site 7.26 (SP059E) Rear of Irby Hall	High	Again, definitely NO. GB Review and Site/Parcel classifications are flawed/unsound. Refer to first Q2.16 Response and Evidence Base GB Review Response incl. uploaded files still relevant here also. For a contribution to be 'strong' needs just one GB Purpose contravened – it's NOT an averaging process. For Site 7.26, contraventions include Purpose 1 (Sprawl) by adding large site to existing built-up area; Purpose 3 (Encroach) as site is so large development would encroach greatly into countryside and harm setting, views and public amenity; Purpose 4 (Historic Setting) as Irby is an ancient settlement with known Heritage assets incl. related to Battle of Brunanburh (see paper by Prof Gregg), harm to setting of Ancient Monument of exemplar moated Irby Hall, ditto Londymere Roman Well; and Purpose 5 (Assist Regeneration) where documents with first Q2.16 Response show the unique relevance of Purpose 5 to Wirral - to say all GB does this is to completely misunderstand the special situation here and the 'exceptional circumstances' applying uniquely to Wirral. In addition, there are the aspects of Character and Harm that have not been taken into account at all and should be: fragile wildlife/ecology incl. Great Crested Newt Colony, large scheduled 'open water' pond, Migrating/Wading Bird foraging area, BMV Agri land, Irby Village Sense of Place, loss of rural character, and more. Similar comments apply to all 12 Option 2A Sites, all 4 Option 2B Sites and all other Sites classified as 'weakly performing'. Read with uploaded ITPAS DOR Consultation 2018 Response provided to Forward Planning, most of which remains relevant to this Consultation. Particularly paragraphs 2.33 to 2.46 inclusive apply directly to this Site, 7.26.	<a href="https://wirral-consult.objective.co.uk/file/5677783">https://wirral-consult.objective.co.uk/file/5677783</a>					
1241821	LPIO-26101 1 of 3				Thus, the Review of the Green Belt must be viewed as a review in order to identify parcels that could support housing development rather than an open-minded review for all related purposes. The Council has not searched non-green belt areas, including brownfield sites with the vigour applied to Green belt land. There has been no published 'for consultation' review of brownfield sites as that for Green Belt. An arithmetic calculation base - rather than actual - has been used and it is questioned whether the Council's register of such land is up to date. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by 'only 12 of the 100 parcels of land is simply not credible. Such a position requires hard evidence and, in the absence of this, there appear to be no circumstances that justify any releases, certainly not to meet a discredited assessment of housing need. Whilst strongly supporting the public contention that there must be no change to the Green Belt designations across the Wirral, the following comments draw on specific knowledge of Area 6 and thence of Parcels 7.14- 7.20. It is appropriate that such local knowledge is given credence and contributes to in the Council's further testing of the reality of its proposals. References in the report to other local authorities demonstrate that there is no precise science to assessment. The fact that the Arup report limits consideration to the 5 purposes of Green belt registration is derived from 'guidance'. For example, quality of landscape, an inherent contribution to Green Belt is ignored. By limiting purposes to the physical characteristics, no consideration is given to the benefits of the Green Belt enjoyed by residents and visitors - such as enjoyment of the rural areas, appreciation of countryside, the viewing of wild life and the health advancing benefits of open spaces. Assessments use what must be described as subjective scoring.						
1241821	LPIO-26101 2 of 3				They place an over reliance on what is described as professional judgement without either identifying the professions involved or requiring the evidence to support their opinions. The Herculean task of their assessing 100 parcels suggests that a number of professionals were involved; nothing is said about ways in which a common appraisal approach was achieved.  The following comments are, cross referenced to the report pagination and table paragraphs. P11. "Green belt sites will be considered at a later stage". Sites should have been taken into account as they may influence the overall assessment of the parcels within which they lie. E.g. 7.19 includes historic and recorded Viking archaeology which, surely in itself, contributes to Green Belt purposes and makes a housing development on this parcel inappropriate. P14. Green Belt has also had a negative effect in preventing the potential arbitrary natural growth of settlements". This should be classed as a positive rather than a negative effect as a contribution to Purposes 1 to 3 of the Green Belt. P14. The report discusses the interpretation of the five green belt purposes. 'Planning Advisory Services', an arm of the Local Government Association, funded by the Department of Communities and Local Government, has, rightly, the task of encouraging compliance with Government policy. Hence the inference to be drawn from the Guidance, that the five purposes, can be interpreted to assist the identification of "weak" parcels in order that the Government's housing target can be met. P34. The Council, whilst currently holding to a discredited housing numbers target ignores historic associations other than to "towns" of which, it contends there is none within the Green Belt.						

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1241821	LPIO-26101 3 of 3				Without the inclusion of villages and hamlets, the Council objective of "protecting the environmental and heritage assets" a key objective of the local plan is lost. P40. "Landscape character or land quality considerations have not been incorporated - await site selection" This exclusion is not understood. It is the landscape character that frequently makes an area attractive for its protection and consideration of these elements could usefully have been included in the overall assessment as a second level consideration to the five purposes. P55. "Should the Council consider that Green Belt boundaries need to be altered, an exceptional circumstances case will need to be developed. The lower performing parcels have the greatest potential to be considered for release ..... higher performing Green Belt parcels can also be considered for release albeit a stronger exceptional circumstances case will need to be made." It follows that the exceptional case must be based on as objective assessment as possible. The conclusions of the report are based on subjective opinions and professional judgements. Having decided that, of the five justifications for Green belt inclusion, purpose 4 (historic towns) has no relevance and that Purpose 5 Urban generation applies equally to all parcels, the scoring system results in a skewing of results. Issues that have not been covered in the report, such as landscape character, considerations of washed over localities will have to be explained away in the case of exceptional circumstances for development. However, the counter argument for denial of use of the Green Belt for development will be strengthened by their inclusion. The Council should recognise that the requirement for an exceptional circumstance for development can be countered by an exceptional circumstance AGAINST development which will draw on those compelling factors, such as landscape quality, that the draft local plan ignores.						
1241821	LPIO-26104 1 of 2				Detailed Green Belt Parcel Assessment Table. 7.15 to 7.19. These are assessed as making no contribution to checking the unrestricted sprawl of large built up areas. It is their designation as Green Belt, this has actually prevented sprawl from the built-up areas of Heswall, Pensby, Thingwall and Upton. 7.16. The over prescriptive definition of "town" fails to give adequate weight to villages and hamlets, which give the green areas of Wirral their unique character. The Settlement Area 7.16 omits Barnston. Its exclusion as a "washed over" village, obscures the fact that it is a historic entity, in a conservation area and is greatly enhanced by the surrounding farmland and open country. Its immediate environment is one of the most attractive locations of the Wirral and it is not understood how this, and the adjoining parcels can be assessed as making a weak contribution to the Green belt. The tree lined (many with TPO's) road approaches, especially from the South set the context of this rural area. It is not mentioned that this parcel supports a beneficial Green Belt use in providing access to countryside in common with adjoining parcels through public footpaths between Barnston and Heswall. Elsewhere (e.g. 7.25) such features contribute to a strong score. 7.19 is described as "flat". It includes Cross Hill, a high point in the locality with many historical attributes. 7.20. The overall assessment of just this parcel is "strong", secured by the application of professional judgement. Visual appreciation of 7.20 raises very real doubts as to the validity of this assessment. For example, the description of 7.20 under Purpose 3 includes "strongly connected to the countryside .... natural field boundaries ..... a tree line ... less than 20% built. ... long line views.						
1241821	LPIO-26104 2 of 2				The parcel supports a strong-moderate degree of openness." These descriptions are clearly applicable to the parcels 7.15 to 7.19, yet all secure only "Moderate" for Purpose 3. Given that "professional judgement" is critical, in arriving at these assessment scores, it is unfortunate that no detail is given of the professional expertise brought to bear. Is it Planning, Physical geography, Environmental, Ecological etc? This information should accompany the opinion. It is regrettable the Council has not worked with the grain of public opinion in its preparation of the draft local plan. Only 12 parcels were deemed to make a strong contribution to the purposes of the Green belt. This seems a strange and unlikely position when compared with the robust and stable Green belt that has existed since at least 1983. With 46 parcels assessed as making a weak contribution, every one of these is a candidate for development. It is not clear, apart from the obvious economies of scale, why the 46 have not been comparatively assessed to arrive at a short list. Options 2a and 2b. The inclusion of Options 2a and 2b indicate, not a prudent contingency, but a weakness of the Council's position. They should be struck out from the final local plan. They should be replaced by the exceptional case that Wirral, as a peninsula, with its limitations of communications, of population growth and its major areas of brownfield potential is an exceptional case for relief from the standard methodology of household projections. Developers may be expected to make market considerations their prime motivation. They are likely to demand early release of Green Belt sites due to ease of associated low costs of infrastructure and of pre-construction preparation. The Council should resist such pressures.						
1249271	LPIO-26117 1 of 4		SHLAA4068 Birkenhead Road, Meols Parcel 6.6	Weak	The Green Belt Review found the wider Green Belt Parcel 6.5 to make a strong contribution to the purposes of the Green Belt noting that it has a strong degree of openness and a mix of durable and less durable boundaries. This is not something that we dispute, recognising that this assessment relates to the whole parcel, the majority of which extends beyond the existing pocket of residential properties on Heron Road. We do note however that the Parcel follows the building line of these properties and would not appear any more prominent than the existing residential area.	<a href="https://wirral-consult.objective.co.uk/file/5678238">https://wirral-consult.objective.co.uk/file/5678238</a>					
1249271	LPIO-26117 2 of 4		SHLAA4068 Birkenhead Road, Meols Parcel 6.6	Weak	The Green Belt Review found the wider Green Belt Parcel 6.5 to make a strong contribution to the purposes of the Green Belt noting that it has a strong degree of openness and a mix of durable and less durable boundaries. This is not something that we dispute, recognising that this assessment relates to the whole parcel, the majority of which extends beyond the existing pocket of residential properties on Heron Road. We do note however that the Parcel follows the building line of these properties and would not appear any more prominent than the existing residential area.	<a href="https://wirral-consult.objective.co.uk/file/5677494">https://wirral-consult.objective.co.uk/file/5677494</a>	<a href="https://wirral-consult.objective.co.uk/file/5685010">https://wirral-consult.objective.co.uk/file/5685010</a>	<a href="https://wirral-consult.objective.co.uk/file/5678243">https://wirral-consult.objective.co.uk/file/5678243</a>	<a href="https://wirral-consult.objective.co.uk/file/567824">https://wirral-consult.objective.co.uk/file/567824</a>	<a href="https://wirral-consult.objective.co.uk/file/567749">https://wirral-consult.objective.co.uk/file/567749</a>	<a href="https://wirral-consult.objective.co.uk/file/5678246">https://wirral-consult.objective.co.uk/file/5678246</a>
1249271	LPIO-26117 3 of 4		SHLAA4068 Birkenhead Road, Meols Parcel 6.6	Weak	The Green Belt Review found the wider Green Belt Parcel 6.5 to make a strong contribution to the purposes of the Green Belt noting that it has a strong degree of openness and a mix of durable and less durable boundaries. This is not something that we dispute, recognising that this assessment relates to the whole parcel, the majority of which extends beyond the existing pocket of residential properties on Heron Road. We do note however that the Parcel follows the building line of these properties and would not appear any more prominent than the existing residential area.	<a href="https://wirral-consult.objective.co.uk/file/5677491">https://wirral-consult.objective.co.uk/file/5677491</a>	<a href="https://wirral-consult.objective.co.uk/file/5677493">https://wirral-consult.objective.co.uk/file/5677493</a>	<a href="https://wirral-consult.objective.co.uk/file/5678242">https://wirral-consult.objective.co.uk/file/5678242</a>	<a href="https://wirral-consult.objective.co.uk/file/5684854">https://wirral-consult.objective.co.uk/file/5684854</a>	<a href="https://wirral-consult.objective.co.uk/file/5678236">https://wirral-consult.objective.co.uk/file/5678236</a>	<a href="https://wirral-consult.objective.co.uk/file/5678244">https://wirral-consult.objective.co.uk/file/5678244</a>

Person ID	ID	Question 2.16 - Do you agree with the classification of sites set out within the 2019 Green Belt Review?	Site number / Reference:	Question 2.16b - Suggested alternative classification (please select):	Question 2.16c - Please give your reasons below. (If you don't agree with the Green Belt Review Methodology you can comment in the separate evidence consultation)	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6
1249271	LPIO-26117 4 of 4		SHLAA4068 Birkenhead Road, Meols Parcel 6.6	Weak	The Green Belt Review found the wider Green Belt Parcel 6.5 to make a strong contribution to the purposes of the Green Belt noting that it has a strong degree of openness and a mix of durable and less durable boundaries. This is not something that we dispute, recognising that this assessment relates to the whole parcel, the majority of which extends beyond the existing pocket of residential properties on Heron Road. We do note however that the Parcel follows the building line of these properties and would not appear any more prominent than the existing residential area.	<a href="https://wirral-consult.objective.co.uk/file/5677492">https://wirral-consult.objective.co.uk/file/5677492</a>	<a href="https://wirral-consult.objective.co.uk/file/5678239">https://wirral-consult.objective.co.uk/file/5678239</a>	<a href="https://wirral-consult.objective.co.uk/file/5678247">https://wirral-consult.objective.co.uk/file/5678247</a>	<a href="https://wirral-consult.objective.co.uk/file/5684889">https://wirral-consult.objective.co.uk/file/5684889</a>	<a href="https://wirral-consult.objective.co.uk/file/5678241">https://wirral-consult.objective.co.uk/file/5678241</a>	<a href="https://wirral-consult.objective.co.uk/file/5678248">https://wirral-consult.objective.co.uk/file/5678248</a>
1249269	LPIO-26158		SHLAA 4040	Moderate	There is no justification within the 2019 Green Belt Review as to why a different approach has been taken from the Interim Review in September 2018. Section 4.4.1 of the 2019 Green Belt Review states that "durable features will be used in the first instance with parcels drawn from the settlement outwards to the nearest durable feature". Table 3 of the Review confirms durable features include roads (A road, B roads and unclassified 'made' roads). As SHLAA 4040, within Parcel 4.2, is enclosed on all sides by existing highway infrastructure, it should have been assessed as a standalone parcel, given it is enclosed by 'durable features' which are readily recognisable and permanent. The Council must review their assessment to ensure the Site is assessed correctly and presents a robust conclusion in relation to the contribution it makes to the Green Belt. Our assessment, set out in our attachment, is that the site makes a moderate contribution to two purposes (purpose 3 and purpose 5), a weak contribution to one purpose (purpose 2) and no contribution to two purposes (purpose 1 and purpose 4). In line with the methodology set out in the 2019 Green Belt Review, the parcel makes a weak contribution to the Green Belt overall.	<a href="https://wirral-consult.objective.co.uk/file/5675699">https://wirral-consult.objective.co.uk/file/5675699</a>					
1249263	LPIO-26168		Parcel 4.13 (SHLAA 0891)	Weak	We agree with the conclusions of the Green Belt Assessment for Parcel 4.13 (SHLAA 0891) insofar as it makes a weak contribution to the Green Belt as a whole. Whilst we acknowledge that the Parcel could provide some purpose in preventing urban sprawl, we consider that the Parcel benefits from such clear boundaries, as to make the existing southern boundary of built development at Eastham superfluous and an entirely logical infilling of the Green Belt.	<a href="https://wirral-consult.objective.co.uk/file/5684852">https://wirral-consult.objective.co.uk/file/5684852</a>					
1244896	LPIO-2622	no	Site 7.25 (SP009 part) West of Sandy Lane, Irby	High	NO, GB Review + Site/Parcel classifications are flawed/unsound. Refer to 1st/2nd Q2.16 Responses + Evidence Base GB Review Response incl. still relevant uploaded files. For contribution to be 'strong' needs just one GB Purpose contravened – it's NOT an averaging process. Site 7.25, contraventions include Purpose 1 (Sprawl) adding long site to existing built-up area; Purpose 3 (Encroachment) as site is long development would encroach significantly into countryside harming Area of Special Landscape Value, sense of place, views, public amenity and fragile Greasby Brook; Purpose 4 (Historic Setting) Irby is an ancient settlement with known Heritage assets incl. related to Battle of Brunanburh (see Prof Gregg paper), access road is an ancient road; and Purpose 5 (Assist Regen) where docs with 1st Q2.16 Response show unique relevance of Purpose 5 to Wirral - saying all GB does this is to completely misunderstand the special situation here and "exceptional circumstances" applying uniquely to Wirral. In addition, there are the aspects of Character and Harm that have not been taken into account and should be: fragile wildlife/ecology, Sense of Place, loss of rural character, area of high incidence of primary school children walking to/from School, narrow access road which is already a 'rat-run' with imminent traffic-calming measures, heavily trafficked route for cars and pedestrians accessing Thurston Common, the woods and Royden Park - walkers and dog-walkers, parking problems worsened by Council charges elsewhere, and more. Similar comments apply to all 12 Option 2A Sites, all 4 Option 2B Sites and all other Sites classified as 'weakly performing'. Read with uploaded ITPAS DOR Consultation 2018 Response (especially Appendix 6 – Assessment of GB Sites) provided to FPlan and again with Q2.16 2nd Response, most remains relevant here despite this Site NOT being one of '48 GB Sites for Further Investigation'.	<a href="https://wirral-consult.objective.co.uk/file/567712">https://wirral-consult.objective.co.uk/file/567712</a>					
1249116	LPIO-26260 1 of 2		SHLAA 0925 Option 2A GB parcel 5.9	Weak	We support the identification of Parcel 5.9 at Saughall Massie and the Council's assessment that the site makes a weak overall contribution to the five purposes of the Green Belt but our own assessment, set out in our attachments, is that the site makes a weak contribution under all five Green Belt purposes (not a moderate contribution to one, a weak contribution to one and no contribution to three purposes). It would provide a natural and well contained extension to the urban area, has defensible boundaries on all sides, would not result in the coalescence of neighbouring towns, has a clear physical and visual separation from the Green Belt, would not intrude discordantly into the open countryside, a sensitively designed housing development would not adversely impact on the surrounding setting or character of Saughall Massie Conservation Area, and there is insufficient previously developed land in the Borough to accommodate future housing requirements.	<a href="https://wirral-consult.objective.co.uk/file/5684803">https://wirral-consult.objective.co.uk/file/5684803</a>	<a href="https://wirral-consult.objective.co.uk/file/5675692">https://wirral-consult.objective.co.uk/file/5675692</a>	<a href="https://wirral-consult.objective.co.uk/file/5677036">https://wirral-consult.objective.co.uk/file/5677036</a>	<a href="https://wirral-consult.objective.co.uk/file/5674242">https://wirral-consult.objective.co.uk/file/5674242</a>		
1249116	LPIO-26260 2 of 2		SHLAA 0925 Option 2A GB parcel 5.9	Weak	We support the identification of Parcel 5.9 at Saughall Massie and the Council's assessment that the site makes a weak overall contribution to the five purposes of the Green Belt but our own assessment, set out in our attachments, is that the site makes a weak contribution under all five Green Belt purposes (not a moderate contribution to one, a weak contribution to one and no contribution to three purposes). It would provide a natural and well contained extension to the urban area, has defensible boundaries on all sides, would not result in the coalescence of neighbouring towns, has a clear physical and visual separation from the Green Belt, would not intrude discordantly into the open countryside, a sensitively designed housing development would not adversely impact on the surrounding setting or character of Saughall Massie Conservation Area, and there is insufficient previously developed land in the Borough to accommodate future housing requirements.	<a href="https://wirral-consult.objective.co.uk/file/5684834">https://wirral-consult.objective.co.uk/file/5684834</a>	<a href="https://wirral-consult.objective.co.uk/file/5674256">https://wirral-consult.objective.co.uk/file/5674256</a>	<a href="https://wirral-consult.objective.co.uk/file/5677037">https://wirral-consult.objective.co.uk/file/5677037</a>	<a href="https://wirral-consult.objective.co.uk/file/5684809">https://wirral-consult.objective.co.uk/file/5684809</a>		

Person ID	ID	Question 2.16a - Do you agree with the classification of sites set out within the 2019 Green Belt Review?	Site number / Reference:	Question 2.16b - Suggested alternative classification (please select):	Question 2.16c - Please give your reasons below. (If you don't agree with the Green Belt Review Methodology you can comment in the separate evidence consultation)	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6	
1249638	LPIO-26274 1 of 2		Parcels 5.11 and 5.12	Weak	All 5 NPPF purposes of including land in the Green Belt are included in the assessment of GAs and Parcels, including the fifth purpose 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The GBR finds that each GA and Parcel across the borough makes the same contribution to Purpose 5, and in each case, it is a 'moderate' contribution. We are of the view that this methodology is untested, flawed and has led to unsound findings. We believe this has shaped the site selections that have been put forward as options for Green Belt release in Option 2A and 2B and so is a critical matter for this consultation. In terms of Parcels 5.11 and 5.12, the Green Belt Review finds that in respect of 5.11 the overall contribution to the Green Belt is 'weak' and 'strong' in respect of Parcel 5.12; We strongly disagree with the latter. Looking at the assessment for Parcel 5.12, and the 'weighted' Purposes 1, 2 and 3, the assessment concluded 'No Contribution', 'Moderate Contribution' and 'Strong Contribution' in that order. Our view is that in this case the Overall Assessment in this case should clearly have concluded that the overall contribution was 'Moderate' or 'Weak/Moderate'. Purpose 3 appears to have been given full weighting on its own, which is clearly not a 'balanced judgement' as is committed to within the GBR methodology. Furthermore, it should be noted that whilst SHLAA4020 lies within Parcel 5.12, it is only a small section of this Parcel, closely aligned with the urban area of Greasby and the assessment of Parcel 5.11. SHLAA4020 can therefore only be considered to make an overall 'Weak Contribution'.	<a href="https://wirral-consult.objective.co.uk/file/5675735">https://wirral-consult.objective.co.uk/file/5675735</a>	<a href="https://wirral-consult.objective.co.uk/file/5685061">https://wirral-consult.objective.co.uk/file/5685061</a>	<a href="https://wirral-consult.objective.co.uk/file/5685064">https://wirral-consult.objective.co.uk/file/5685064</a>	<a href="https://wirral-consult.objective.co.uk/file/5685062">https://wirral-consult.objective.co.uk/file/5685062</a>	<a href="https://wirral-consult.objective.co.uk/file/5685066">https://wirral-consult.objective.co.uk/file/5685066</a>	<a href="https://wirral-consult.objective.co.uk/file/5685065">https://wirral-consult.objective.co.uk/file/5685065</a>	
1249638	LPIO-26274 2 of 2		Parcels 5.11 and 5.12	Weak	All 5 NPPF purposes of including land in the Green Belt are included in the assessment of GAs and Parcels, including the fifth purpose 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The GBR finds that each GA and Parcel across the borough makes the same contribution to Purpose 5, and in each case, it is a 'moderate' contribution. We are of the view that this methodology is untested, flawed and has led to unsound findings. We believe this has shaped the site selections that have been put forward as options for Green Belt release in Option 2A and 2B and so is a critical matter for this consultation. In terms of Parcels 5.11 and 5.12, the Green Belt Review finds that in respect of 5.11 the overall contribution to the Green Belt is 'weak' and 'strong' in respect of Parcel 5.12; We strongly disagree with the latter. Looking at the assessment for Parcel 5.12, and the 'weighted' Purposes 1, 2 and 3, the assessment concluded 'No Contribution', 'Moderate Contribution' and 'Strong Contribution' in that order. Our view is that in this case the Overall Assessment in this case should clearly have concluded that the overall contribution was 'Moderate' or 'Weak/Moderate'. Purpose 3 appears to have been given full weighting on its own, which is clearly not a 'balanced judgement' as is committed to within the GBR methodology. Furthermore, it should be noted that whilst SHLAA4020 lies within Parcel 5.12, it is only a small section of this Parcel, closely aligned with the urban area of Greasby and the assessment of Parcel 5.11. SHLAA4020 can therefore only be considered to make an overall 'Weak Contribution'.	<a href="https://wirral-consult.objective.co.uk/file/5685063">https://wirral-consult.objective.co.uk/file/5685063</a>						
1249638	LPIO-26305 1 of 3		SHLAA1774/1776	Weak	All 5 NPPF purposes of including land in the Green Belt are included in the assessment of GAs and Parcels, including the fifth purpose 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The GBR finds that each GA and Parcel across the borough makes the same contribution to Purpose 5, and in each case, it is a 'moderate' contribution. We are of the view that this methodology is untested, flawed and has led to unsound findings. We believe this has shaped the site selections that have been put forward as options for Green Belt release in Option 2A and 2B and so is a critical matter for this consultation. In consideration of the classification of sites as it relates to SHLAA1774/1776, we will concentrate on General Area 3 and Green Belt Parcels 7.23 and 7.24. The conclusion in the GBR is that Parcel 3 makes a 'Strong' contribution to the Green Belt. In terms of Parcels 7.23 and 7.24, the Report finds that in respect of both parcels the overall contribution to the Green Belt is 'moderate'. It should be noted that whilst SHLAA1774/1776 lie within these Parcels 7.23 and 7.24, they only form part of a small section of these Parcels and are closely aligned with the urban area of Irby. It is however welcomed that the 2019 GBR assesses a much smaller parcel in respect of the land to the west of Mill Hill Road (Parcel 7.24) as the previous assessment considered a much wider parcel that also incorporated Royden Park and this had a significant effect on the Overall Assessment. Overall, the attached Development Statement's Green Belt Assessment concludes that SHLAA1774/1776 makes a weak contribution to the Green Belt due to its limited role in preventing the merging of settlements. It would maintain the character of Irby as a distinct and separate settlement, which the release of Green Belt to the south, west or east of Irby would not achieve.	<a href="https://wirral-consult.objective.co.uk/file/5675084">https://wirral-consult.objective.co.uk/file/5675084</a>						
1249638	LPIO-26305 2 of 3		SHLAA1774/1776	Weak	All 5 NPPF purposes of including land in the Green Belt are included in the assessment of GAs and Parcels, including the fifth purpose 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The GBR finds that each GA and Parcel across the borough makes the same contribution to Purpose 5, and in each case, it is a 'moderate' contribution. We are of the view that this methodology is untested, flawed and has led to unsound findings. We believe this has shaped the site selections that have been put forward as options for Green Belt release in Option 2A and 2B and so is a critical matter for this consultation. In consideration of the classification of sites as it relates to SHLAA1774/1776, we will concentrate on General Area 3 and Green Belt Parcels 7.23 and 7.24. The conclusion in the GBR is that Parcel 3 makes a 'Strong' contribution to the Green Belt. In terms of Parcels 7.23 and 7.24, the Report finds that in respect of both parcels the overall contribution to the Green Belt is 'moderate'. It should be noted that whilst SHLAA1774/1776 lie within these Parcels 7.23 and 7.24, they only form part of a small section of these Parcels and are closely aligned with the urban area of Irby. It is however welcomed that the 2019 GBR assesses a much smaller parcel in respect of the land to the west of Mill Hill Road (Parcel 7.24) as the previous assessment considered a much wider parcel that also incorporated Royden Park and this had a significant effect on the Overall Assessment. Overall, the attached Development Statement's Green Belt Assessment concludes that SHLAA1774/1776 makes a weak contribution to the Green Belt due to its limited role in preventing the merging of settlements. It would maintain the character of Irby as a distinct and separate settlement, which the release of Green Belt to the south, west or east of Irby would not achieve.	<a href="https://wirral-consult.objective.co.uk/file/5675735">https://wirral-consult.objective.co.uk/file/5675735</a>	<a href="https://wirral-consult.objective.co.uk/file/568561">https://wirral-consult.objective.co.uk/file/568561</a>	<a href="https://wirral-consult.objective.co.uk/file/568564">https://wirral-consult.objective.co.uk/file/568564</a>	<a href="https://wirral-consult.objective.co.uk/file/568562">https://wirral-consult.objective.co.uk/file/568562</a>	<a href="https://wirral-consult.objective.co.uk/file/568566">https://wirral-consult.objective.co.uk/file/568566</a>	<a href="https://wirral-consult.objective.co.uk/file/568565">https://wirral-consult.objective.co.uk/file/568565</a>	



Person ID	ID	Question 2.16 - Do you agree with the classification of sites set out within the 2019 Green Belt Review?	Site number / Reference:	Question 2.16b - Suggested alternative classification (please select):	Question 2.16c - Please give your reasons below. (If you don't agree with the Green Belt Review Methodology you can comment in the separate evidence consultation)	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6
1249638	LPIO-26305 3 of 3		SHLAA1774/1776	Weak	All 5 NPPF purposes of including land in the Green Belt are included in the assessment of GAs and Parcels, including the fifth purpose 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The GBR finds that each GA and Parcel across the borough makes the same contribution to Purpose 5, and in each case, it is a 'moderate' contribution. We are of the view that this methodology is untested, flawed and has led to unsound findings. We believe this has shaped the site selections that have been put forward as options for Green Belt release in Option 2A and 2B and so is a critical matter for this consultation. In consideration of the classification of sites as it relates to SHLAA1774/1776, we will concentrate on General Area 3 and Green Belt Parcels 7.23 and 7.24. The conclusion in the GBR is that Parcel 3 makes a 'Strong' contribution to the Green Belt. In terms of Parcels 7.23 and 7.24, the Report finds that in respect of both parcels the overall contribution to the Green Belt is 'moderate'. It should be noted that whilst SHLAA1774/1776 lie within these Parcels 7.23 and 7.24, they only form part of a small section of these Parcels and are closely aligned with the urban area of Irby. It is however welcomed that the 2019 GBR assesses a much smaller parcel in respect of the land to the west of Mill Hill Road (Parcel 7.24) as the previous assessment considered a much wider parcel that also incorporated Royden Park and this had a significant effect on the Overall Assessment. Overall, the attached Development Statement's Green Belt Assessment concludes that SHLAA1774/1776 makes a weak contribution to the Green Belt due to its limited role in preventing the merging of settlements. It would maintain the character of Irby as a distinct and separate settlement, which the release of Green Belt to the south, west or east of Irby would not achieve.	<a href="https://wirral-consult.objective.co.uk/file/568563">https://wirral-consult.objective.co.uk/file/568563</a>					
1249743	LPIO-26358		SHLAA1942 Parcel 4.6	Weak	The Green Belt Review finds that each General Area and Parcel across Wirral makes an equal contribution to the 5th Purpose, 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.' In each case, it is a 'moderate' contribution. No General Areas or Parcels are assessed individually against this purpose through the review. The Council have not included any detailed rationale as to why Purpose 5 is included in the assessment at all, why the decision was made that all General areas and Parcels makes the same contribution of 'moderate' and why individual site assessments were not completed in respect of this purpose. This inclusion of and blanket response to Purpose 5 stating that each General Area and parcel, irrespective of location or physical attributes, makes a moderate contribution to Purpose 5 is broadly different than the approach taken by neighbouring authorities. We consider that this methodology is untested, it is flawed and has ultimately contributed to unsound findings. It is believed that this methodology has hugely shaped site selections put forward as options for Green Belt release in Options 2A and 2B. As such is a critical matter for the council to reconsider as part of this consultation.	<a href="https://wirral-consult.objective.co.uk/file/5684858">https://wirral-consult.objective.co.uk/file/5684858</a>					
1249743	LPIO-26359		SHLAA1942 Parcel 4.6	Weak	SHLAA1942 The Methodology is inconsistent with national advice on how to undertake robust Green Belt assessments. It is also inconsistent with the approach that neighbouring authorities have taken to their Green Belt Reviews. Neighbouring authorities to Wirral have almost universally chosen to follow the national advice and in following this advice have excluded Purpose 5 from their most up to date GB assessments. The appropriate approach of Wirral would have either have been to exclude Purpose 5 from the Green Belt assessment, in line with national guidance and in line with the approach taken by all but one of the neighbouring authorities. Or, if taking the unusual step of including Purpose 5, use a methodology, which has been the subject of examination and therefore can be considered to have some robustness. This would be the Cheshire East methodology. If the GBR had followed the methodologies from the good practice examples, it is our opinion that the result of the assessment would be that General Area 7 would have been found to make a 'weak' overall contribution to the Green Belt and Parcel 4.6 would also make a 'weak' contribution to the Green Belt. If the GBR had followed the CE Methodology in its entirety, we believe that the GBR would have found that GA7 makes a 'weak' overall contribution to the Green Belt and Parcel 4.6 would also have made a 'weak' contribution to the Green Belt. Instead, the 'mix and match' methodology employed in the GBR, has, resulted in an unsound piece of work, which skews the overall outcome towards reducing the number of GA areas which make a 'weak' contribution to the Green Belt to just one area: GA6. This is the Heswall area which accounts for much of the proposed Green Belt release in Options 2A and 2B The council's application of a blanket 'moderate' contribution to Purpose 5 to every GA and Parcel is in effect a barrier to their ability properly plan for and release the most appropriate land to meet their residual housing need. The GBR, as it stands, finds that Parcel 4.6 whilst making a weak contribution to the GB is within GA7, which is erroneously identified by the unusual, untested and ultimately unsound in parts methodology to make a 'moderate' contribution to the Green Belt. The categorising of Parcel 4.6 within a GA which is said to make a moderate contribution to the GB places an unjustified and higher burden on the Parcel, in terms of making a case to support its potential release from the Green Belt. We consider it is more than apparent that this burden is played out in the WLP consultation options, with the Site not being considered for release for residential allocation in either Option 2A or 2B of the WLP, despite the Site only making a weak contribution to the overall Green Belt.	<a href="https://wirral-consult.objective.co.uk/file/5684858">https://wirral-consult.objective.co.uk/file/5684858</a>					

Person ID	ID	Question 2.16 - Do you agree with the classification of sites set out within the 2019 Green Belt Review?	Site number / Reference:	Question 2.16b - Suggested alternative classification (please select):	Question 2.16c - Please give your reasons below. (If you don't agree with the Green Belt Review Methodology you can comment in the separate evidence consultation)	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6	
1249744	LPIO-26372		SHLAA0638 Parcel 5.7	High	The Summary of Initial Green Belt Assessment published in September 2018 suggests two options for the release of the site as part of a wider release of Green Belt land. Both options recommend the release of SHLAA0638 from the Green Belt. Option 2.1 in the document proposes that the site, alongside SHLAA0918 could be released with or without parcels SP004 and SP005 and would have a capacity of up to 27 dwellings with a net developable area of 0.99ha, subject to appropriate design and boundary treatment. Option 2.2 shows that the site, alongside parcels SP002A and SP002C, could be released from the Green Belt with SP003, SP004 and SP005, with or without SP001. The suggested capacity would be up to 52 dwellings (1.92ha developable), subject to the impact on the conservation area and appropriate design and boundary treatment. The commentary for Option 2.2 states that public open space would need to be provided. As demonstrated in the attached indicative site plan there is potential for public open space to be provided within the site which would benefit new and existing residents. It is also noted that future release would need to be subject to independent assessment of landscape impact and highway and transport capacity. A Transport Statement was submitted with the planning application in support of residential development of the site. It concluded that the site has reasonable access to facilities and good transport linkages to other attractions. It stated that the site is a sustainable location at the edge of the urban area and that a site layout can be designed to accord with good practice. The Transport Statement found that the proposed development of the site for 19 dwellings would have little or no impact on the local highway network. Parts of the site perimeter are formed by neighbouring housing to the east and west. The Initial Background Data states that site has a moderate boundary strength and is part bounded by existing development in the Green Belt. It notes that the field boundary to the south of the site is weak. In the Summary Level of Containment it states that the site is 'not enclosed'. However, Appendix 12 titled 'Green Belt Sites Initial Separation Commentary' states that the 'former garden nursery is largely enclosed by existing development in the Green Belt which would not reduce the existing minimum separation distance between SA5 and SA6 or between SA5 and the rural village of Saughall Massie'. Appendix 11 confirms there are no separation issues identified and states that the site has potential for infill development. Appendix 13 of the Initial Green Belt Review Background Report confirms that the site is a SHLAA site with no constraints in relation to flooding, biodiversity, wetland bird survey count areas and best and most versatile agricultural land. Appendix 20 of the Initial Green Belt Review Background Report shows the site as being located within an area of highest accessibility.	<a href="https://wirral-consult.objective.co.uk/file/5684878">https://wirral-consult.objective.co.uk/file/5684878</a>	<a href="https://wirral-consult.objective.co.uk/file/5684876">https://wirral-consult.objective.co.uk/file/5684876</a>	<a href="https://wirral-consult.objective.co.uk/file/5684877">https://wirral-consult.objective.co.uk/file/5684877</a>	<a href="https://wirral-consult.objective.co.uk/file/5684880">https://wirral-consult.objective.co.uk/file/5684880</a>	<a href="https://wirral-consult.objective.co.uk/file/5684879">https://wirral-consult.objective.co.uk/file/5684879</a>		
1249745	LPIO-26377 1 of 2		SHLAA4010/4 075/4076 The Storeton Garden Village	Moderate	SHLAA4010/4075/4076 (The Storeton Garden Village) lies within 'General Area 7' which covers the length of Green Belt between the existing urban area to the east and the M53 to the west. General Area 7 is assessed as making a 'Moderate' overall contribution to the Green Belt. It is therefore considered in the Review to perform better than three of the nine General Areas and the same as five of the nine areas. Only one area ('General Area 6') is assessed as making a lesser 'Weak' contribution. The Green Belt boundary included in General Area 7 was originally drawn along the existing urban areas and the defensible nature of the boundaries in this area is variable. It is considered that the M53 is an extremely strong and defensible Green Belt boundary and is far more defensible than the current boundary along the urban edge. We note that General Areas 3, 5 and 8 cover a significant proportion of the Green Belt within Wirral, indicating that a large part of the Green Belt plays a greater strategic Green Belt function than General Area 7. Given the confined nature of G7 and the presence of a very strong and permanent western boundary, we consider that in the scoring in the Green Belt Assessment, G7 should not make a stronger contribution to the Green Belt than G8 given the characteristics of both. SHLAA4010/4075/4076 (The Storeton Garden Village) lies within parts of Parcels 4.1 and 4.2. It is important to note that the boundaries of Parcels 4.1 and 4.2 extend further to the north and east than the boundaries of SHLAA4010/4075/4076 and the assessment of the site in isolation will therefore produce different results. We consider that the land covered by SHLAA4010/4075/4076 (the Storeton Garden Village) makes a lower contribution to the purposes of the Green Belt than the findings of the Green Belt Review assessment results for Parcels 4.1 and 4.2. From reviewing the Green Belt Review in detail, we consider that an inconsistent approach has been applied and Parcels 4.1 and 4.2 should not score worse than Parcels 4.11 and 4.12.	<a href="https://wirral-consult.objective.co.uk/file/5680001">https://wirral-consult.objective.co.uk/file/5680001</a>						
1249745	LPIO-26377 2 of 2		SHLAA4010/4 075/4076 The Storeton Garden Village	Moderate	SHLAA4010/4075/4076 (The Storeton Garden Village) lies within 'General Area 7' which covers the length of Green Belt between the existing urban area to the east and the M53 to the west. General Area 7 is assessed as making a 'Moderate' overall contribution to the Green Belt. It is therefore considered in the Review to perform better than three of the nine General Areas and the same as five of the nine areas. Only one area ('General Area 6') is assessed as making a lesser 'Weak' contribution. The Green Belt boundary included in General Area 7 was originally drawn along the existing urban areas and the defensible nature of the boundaries in this area is variable. It is considered that the M53 is an extremely strong and defensible Green Belt boundary and is far more defensible than the current boundary along the urban edge. We note that General Areas 3, 5 and 8 cover a significant proportion of the Green Belt within Wirral, indicating that a large part of the Green Belt plays a greater strategic Green Belt function than General Area 7. Given the confined nature of G7 and the presence of a very strong and permanent western boundary, we consider that in the scoring in the Green Belt Assessment, G7 should not make a stronger contribution to the Green Belt than G8 given the characteristics of both. SHLAA4010/4075/4076 (The Storeton Garden Village) lies within parts of Parcels 4.1 and 4.2. It is important to note that the boundaries of Parcels 4.1 and 4.2 extend further to the north and east than the boundaries of SHLAA4010/4075/4076 and the assessment of the site in isolation will therefore produce different results. We consider that the land covered by SHLAA4010/4075/4076 (the Storeton Garden Village) makes a lower contribution to the purposes of the Green Belt than the findings of the Green Belt Review assessment results for Parcels 4.1 and 4.2. From reviewing the Green Belt Review in detail, we consider that an inconsistent approach has been applied and Parcels 4.1 and 4.2 should not score worse than Parcels 4.11 and 4.12.	<a href="https://wirral-consult.objective.co.uk/file/5680005">https://wirral-consult.objective.co.uk/file/5680005</a>	<a href="https://wirral-consult.objective.co.uk/file/5684864">https://wirral-consult.objective.co.uk/file/5684864</a>	<a href="https://wirral-consult.objective.co.uk/file/5684863">https://wirral-consult.objective.co.uk/file/5684863</a>	<a href="https://wirral-consult.objective.co.uk/file/5680006">https://wirral-consult.objective.co.uk/file/5680006</a>	<a href="https://wirral-consult.objective.co.uk/file/568486">https://wirral-consult.objective.co.uk/file/568486</a>	<a href="https://wirral-consult.objective.co.uk/file/5684862">https://wirral-consult.objective.co.uk/file/5684862</a>	

Person ID	ID	Question 2.16 - Do you agree with the classification of sites set out within the 2019 Green Belt Review?	Site number / Reference:	Question 2.16b - Suggested alternative classification (please select):	Question 2.16c - Please give your reasons below. (If you don't agree with the Green Belt Review Methodology you can comment in the separate evidence consultation)	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6	
1249745	LPIO-26378 1 of 2		SHLAA4010/4 075/4076 The Storeton Garden Village	Moderate	Purpose 1: The development of SHLAA4010/4075/4076 (the Storeton Garden Village) would see the creation of a sustainable garden village around the existing settlement of Storeton and in close proximity to the larger settlements of Prenton and Higher Bebington whilst retaining a strategic separation between the settlements. The land between the M53 motorway and the existing urban areas of Prenton and Higher Bebington are extremely well contained by the M53 motorway. The motorway is a very defensible long-term boundary and would restrict the sprawl of large built up areas any further west. Notwithstanding, the strong western boundary associated with this site, strong boundaries which comply with the Council's Green Belt Assessment methodology also exist to the North which has the strong and durable mature tree and hedgerow boundary between the site and Prenton Golf Course; South which is defined by Rest Hill Road; and, East which is bounded by Storeton Wood and Marsh Lane to the south Lever Causeway and Marsh Hey Cover and a mature tree and hedgerow belt to the north of Lever Causeway. There are a number of urbanising features within the proposed development site which ensure its character is at least semi-urban, for instance the settlement of Storeton, the prominent feature of Lever Causeway and a number of residential properties. The land to the south of Lever Causeway has an urban fringe character due to its use for horse grazing and the presence of large scale farm buildings and associated development. The release of the land up to the M53 boundary forms a logical Green Belt release and would result in the creation of a strong and defensible boundary to the remaining Green Belt land in Wirral. The removal of the site from the Green Belt will not result in the unrestricted sprawl of large built up areas such as Prenton and Higher Bebington. Instead the masterplan for the site has been developed to create a sustainable garden village with essential facilities in a sustainable and appropriate location. The masterplan has also sought to subsume the existing urbanising features whilst ensuring a suitable separation could be retained between the Storeton Garden Village and the existing urban area. For these reasons we therefore consider that the site makes 'No Contribution' to Purpose 1. Purpose 2: The proposed development site is not important in preventing any neighbouring towns from merging into one another..	<a href="https://wirral-consult.objective.co.uk/file/5680001">https://wirral-consult.objective.co.uk/file/5680001</a>						
1249745	LPIO-26378 2 of 2		SHLAA4010/4 075/4076 The Storeton Garden Village	Moderate	The Site does not comprise an essential parcel of land that needs to be kept open for any strategic reason and has a number of urbanising features already present: Storeton Village; Lever Causeway and a number of residential properties. Furthermore, we note that it was identified as part of a potential strategic opportunity for development in the Council's evidence base for the Local Plan Development Options Review in October 2018. The proposed development site forms part of a large tract of land between Bebington and Heswall that contains a number of villages, farmsteads and scattered dwellings. The nearest settlement beyond the M53 motorway boundary is Barnston which remains over 1.3km to the south west of the proposed development site. The release of the proposed development site will not result in the merging of neighbouring towns into one another and an appropriate distance is retained. In conclusion, the removal of the site from the Green Belt will not result in the merging of existing settlements and the M53 motorway along the western side of the site is a strong, permanent and defensible boundary. For these reasons we therefore consider that the site makes 'No Contribution' to Purpose 2. Purpose 3: It is acknowledged that the proposed development of the land to the East of the M53 will result in the loss of countryside. However, this is the case with all Green Belt land releases to meet development needs and is therefore not relevant when assessing the proposed development site against the Green Belt purposes. The proposed development has a number of urbanising features within it which compromise its true countryside nature. The presence of Level Causeway, Storeton village, agricultural sheds, residential properties and overhead powerlines give the proposed development site an urban fringe character. The land to the west of the M53 has a more countryside feel and the proposed development will not impact on this character. The M53 motorway provides the site with a strong boundary to prevent any encroachment into the remainder of the Green Belt land in Wirral. Furthermore, a strong tree lined boundary is present between the proposed development site and Prenton Golf Course to the north with the adopted Red Hill Road to the south and Storeton Wood/Marsh Lane to the east. The removal of the site would not affect the purpose of safeguarding the countryside from encroachment. For these reasons we therefore consider that the site makes 'No Contribution' to Purpose 3	<a href="https://wirral-consult.objective.co.uk/file/5680005">https://wirral-consult.objective.co.uk/file/5680005</a>	<a href="https://wirral-consult.objective.co.uk/file/5684864">https://wirral-consult.objective.co.uk/file/5684864</a>	<a href="https://wirral-consult.objective.co.uk/file/5684863">https://wirral-consult.objective.co.uk/file/5684863</a>	<a href="https://wirral-consult.objective.co.uk/file/5680006">https://wirral-consult.objective.co.uk/file/5680006</a>	<a href="https://wirral-consult.objective.co.uk/file/568486">https://wirral-consult.objective.co.uk/file/568486</a>	<a href="https://wirral-consult.objective.co.uk/file/5684862">https://wirral-consult.objective.co.uk/file/5684862</a>	
1249745	LPIO-26379 1 of 2		SHLAA4010/4 075/4076 The Storeton Garden Village	Moderate	Purpose 4: We note that for Purpose 4, all parcels have been automatically scored as 'No Contribution' as this purpose is not considered to apply to any of the parcels. However, for the purposes of completeness, and in the event of any challenge to the Green Belt Review on this matter, we have considered this purpose below. The site is not located within or adjacent to an historic town nor is it located within an existing Conservation Area. Mountwood Conservation Area is located to the North East of the site but does not extend to cover any land or buildings within it. The Conservation Area Appraisal of Mountwood Conservation Area explains that views west from the Conservation Area "...are limited from the public domain, being obscured by houses and mature planting." It identifies views to the west from Stanley Avenue and Prenton Lane. However, views from Stanley Lane occur beyond the locked gate at the western edge of the Conservation Area. The proposed development would not impact on the immediate setting of the Conservation Area due to the separation distances that exist and restricted views. As such, the removal of the site from the Green Belt does not affect the purpose of preserving the setting and special character of historic towns. We therefore consider a contribution score of 'No contribution' to be appropriate. Purpose 5: In the 2019 Green Belt Review, for Purpose 5 all parcels have been automatically scored as 'Moderate Contribution' on this basis that all parcels make an equal contribution to this purpose to ensure that each of the purposes is considered and given equal weighting in the overall assessment of Green Belt purposes. We therefore consider a contribution score of 'Moderate Contribution' is appropriate for the site. Applying the scoring system set out in the 2019 Green Belt Review to assess the overall contribution of parcels, it is considered that the site has an overall assessment score of 'Weak'. It can be concluded that the removal of the site from the Green Belt would not affect the integrity of the Green Belt in Wirral as a whole. This is due to the site being located within an area where existing land uses have modified the character of the landscape to give an urban fringe character with the well-defined boundary of the M53 marking the transition to the open countryside. The assessment of the Green Belt purposes we have set out demonstrate that the proposed development site has strong, robust and defensible boundaries particularly along the most important western edge along the M53 motorway.	<a href="https://wirral-consult.objective.co.uk/file/5680005">https://wirral-consult.objective.co.uk/file/5680005</a>	<a href="https://wirral-consult.objective.co.uk/file/5684864">https://wirral-consult.objective.co.uk/file/5684864</a>	<a href="https://wirral-consult.objective.co.uk/file/5684863">https://wirral-consult.objective.co.uk/file/5684863</a>	<a href="https://wirral-consult.objective.co.uk/file/5680006">https://wirral-consult.objective.co.uk/file/5680006</a>	<a href="https://wirral-consult.objective.co.uk/file/568486">https://wirral-consult.objective.co.uk/file/568486</a>	<a href="https://wirral-consult.objective.co.uk/file/5684862">https://wirral-consult.objective.co.uk/file/5684862</a>	

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1249745	LPIO-26379 2 of 2		SHLAA010/4 075/4076 The Storeton Garden Village	Moderate	A revised Green Belt boundary that excluded the Site and followed the M53 and Red Hill Road would not affect the integrity of the wider Green Belt and would reflect the prevailing pattern of urban growth between Junctions 3 and 4 of the M53. It is considered that the Site could also make a substantial contribution to a wider release of Green Belt land between Junctions 3 and 4 while retaining continuity with adjacent developable land east of the M53 and retaining accessible green infrastructure to provide the setting to existing and new development. The Framework [Para 136] sets out the circumstances in which Green Belt boundaries can be redefined. It makes clear that local authorities should alter Green Belt boundaries only where "exceptional circumstances are fully evidenced and justified". In Wirral, the identified need for housing in comparison to the constrained and limited supply of adequate brownfield sites as evidenced by the Consortium's technical Assessments means exceptional circumstances exist to release land from the Green Belt and facilitate delivery of much needed housing over the plan period. In particular, we note that Wirral has persistently under delivered against its housing need [OAN]. There is not the opportunity for the unmet need to be accommodated by neighbouring authorities; and, There is insufficient supply of land to meet the Council's housing requirement over the plan period. The Council previously commissioned and published a Green Belt Review and subsequent "Proposed Green Belt Sites for Further Investigation" document as part of the Development Options Review. The fact that the Council has also commissioned and published the 2019 Green Belt Review as part of the current Issues and Options consultation strongly suggests the Council recognises the need to release and allocate Green Belt land for housing. As such, it can reasonably be concluded that there are exceptional circumstances which justify the removal of the Site from the Green Belt. The Framework (Para 139) sets a requirement when defining Green Belt boundaries to identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching beyond the plan period. The emerging Local Plan does not consider the need to identify safeguarded land and this is an oversight which needs to be addressed in the next iteration of the Plan to ensure it can be found sound at Examination. In the event that our site is not included as a draft allocation, it should at least be included as a safeguarded site.	<a href="https://wirral-consult.objective.co.uk/file/5680001">https://wirral-consult.objective.co.uk/file/5680001</a>					
1249746	LPIO-26393 1 of 2			Weak	Having carried out a previous assessment of sites in the Green Belt, the Council has now commissioned a 2019 Green Belt review, which has categorised parcels of land into different groups according to their contribution to the purposes of including land in the Green Belt. The methodology has regard to national guidance and best practice. It has also had regard to other studies carried out within the region and the findings of Inspectors which have led to their refinement. Our interest is in SHLAA1930 (Vineyard Farm) for which the overall assessment is that it makes a 'weak' contribution. Whilst it is always possible to disagree with individual issues of subjective judgement and we do not concur with all of the findings, the methodology is rigorous and credible. However, although we agree with the methodology in general terms, we would query the implied link between preventing development in the Green Belt and assisting in urban regeneration in Wirral by encouraging the recycling of derelict and other urban land. This is purely anecdotal, and Wirral has provided scant evidence of such a link to date. Indeed, the evidence which is available directly contradicts the existence of a link. As has been seen at Wirral Waters which is now making limited progress only with public funding, significant regeneration has failed to occur despite long-established Green Belt boundaries, with the result that little housing has been delivered at all. The urban area contains very few opportunities suitable for volume housebuilders, who will simply not develop in Wirral without appropriate sites being available. The outcome of the Green Belt Review provides a starting point in determining which sites should be released from the Green Belt, but its scope is restricted to considering the contribution which sites make towards achieving Green Belt purposes. Paragraphs 138 of the Framework requires the achievement of sustainable patterns of development to be considered, whereas more broadly paragraph 139 refers to consistency with the development plan's strategy for meeting identified requirements for sustainable development. On this basis it is necessary to consider the economic, social and environmental implications of alternative site selections.	<a href="https://wirral-consult.objective.co.uk/file/5683633">https://wirral-consult.objective.co.uk/file/5683633</a>	<a href="https://wirral-consult.objective.co.uk/file/5683637">https://wirral-consult.objective.co.uk/file/5683637</a>	<a href="https://wirral-consult.objective.co.uk/file/5683635">https://wirral-consult.objective.co.uk/file/5683635</a>	<a href="https://wirral-consult.objective.co.uk/file/5683638">https://wirral-consult.objective.co.uk/file/5683638</a>	<a href="https://wirral-consult.objective.co.uk/file/5683639">https://wirral-consult.objective.co.uk/file/5683639</a>	<a href="https://wirral-consult.objective.co.uk/file/5683636">https://wirral-consult.objective.co.uk/file/5683636</a>
1249746	LPIO-26393 2 of 2			Weak	Whilst it may be appropriate to compare alternative approaches of a single urban extension or a dispersed alternative at a high level, it is concerning that the Issues and Options Paper names specific sites for potential release on the basis of inadequate evidence and without assessing the alternatives against the spatial strategy for the Local Plan. The evidence which the Council has considered and the conclusions reached are set out in the tables attached to Appendix 4.7 of the Issues and Options Paper. However, from our consideration of SHLAA1930, it is evident that the some of the evidence is cursory at best, that weight has been given to constraints which can simply be removed from the development area, and that there are errors which require correction. Paragraph 4.3.9 states "More detailed assessments of the suitability, availability and achievability of the proposed areas of land would also be required before the draft Local Plan was finalised. This would include further, more detailed assessments of transport, environmental, sustainability, heritage and other site constraints, which would also be used to inform the amount of development that would be appropriate within each area." Of course this is correct, but the danger is that once certain sites are included and others are excluded, inertia sets in. To favour certain parcels of weak performing land when evidence is either absent or has not been properly evaluated is premature, and it is essential that the Council now fully considers site-specific evidence put forward by ourselves and others to arrive at a 'sound' plan. Furthermore, we have seen no discussions about how site options fit in with the proposed settlement strategy and the intention to focus development to the east of the M53 Motorway and not the commuter settlements to the west. In accordance with the representations of the Consortium, the potential need is for land for an additional 6,500 dwellings to be identified as a minimum or up to 14,000 as a maximum, and so the requirement for Green Belt land will be of a different magnitude than that considered to date. There can be no serious doubt that Green Belt release is required, and it is imperative that the translation of weakly performing parcels in the Green Belt Review into potential allocations is revisited.	<a href="https://wirral-consult.objective.co.uk/file/5683657">https://wirral-consult.objective.co.uk/file/5683657</a>					

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1249761	LPIO-26411 1 of 2		SHLAA 0927	Moderate	We endorse the Council's statement that only Green Belt Purposes 1, 2 and 3 appear to allow for an objective and robustly measurable differentiation between individual sites. The latest Green Belt Review assesses all parcels as having 'no contribution' to Purpose 4 and a 'moderate contribution' to Purpose 5. We are also encouraged by some of the specific comments in the latest Green Belt Review regarding the merits of SHLAA0927, albeit we are naturally disappointed that the site is not yet identified as a draft housing allocation, which appears to be based on an incorrect assessment of the site's value as a habitat for protected waterbirds. SHLAA0927 is situated within 'General Area' 3, which is assessed as making a 'strong' overall contribution to the Green Belt (Table 10, page 51 of the Green Belt Review). That finding is not surprising given that General Area 3 covers a very large area (as shown on the plan within Appendix B to the Green Belt Review). That finding alone is therefore largely irrelevant to consideration of SHLAA0927, which is much smaller and immediately adjacent to Settlement Area 6. SHLAA0927 is within Green Belt Parcel 6.14, which is found to make a 'moderate' contribution. We note that Parcel 6.14 is substantially larger than SHLAA0927. Comments on review re. Parcel 6.14: Purpose 1: the review finds that Parcel 6.14 makes 'no contribution' to Purpose 1. We are pleased to note that the previous, flawed approach – of focusing on the proportion of the Parcel's total perimeter that is adjacent to the existing urban boundary – has now been abandoned. We agree with the assessment that Parcel 6.14 does not contribute to Purpose 1. Purpose 2: the assessment finds that Parcel 6.14 makes a 'weak contribution' to preventing towns from merging. We support that finding. We are also pleased that the previous approach of assessing a much larger (Parcel SP008, at the time of the last version of the Green Belt Review) has now been superseded by focusing on smaller areas of land. Purpose 3: the review finds that Parcel 6.14 makes a 'strong contribution' to Purpose 3. We strongly disagree with that conclusion.	<a href="https://wirral-consult.objective.co.uk/file/5684814">https://wirral-consult.objective.co.uk/file/5684814</a>	<a href="https://wirral-consult.objective.co.uk/file/568481">https://wirral-consult.objective.co.uk/file/568481</a>				
1249761	LPIO-26411 2 of 2		SHLAA 0927	Moderate	Most of the commentary in relation to Purpose 3 recognises that the parcel has 'durable boundaries which could prevent encroachment beyond the parcel if it was developed'. The conclusion that the parcel makes a 'strong contribution' to Purpose 3 does not seem to be justified by the earlier comments. Furthermore, we reiterate that the release of SHLAA0927 would enable the provision of much-needed development in a sustainable location, but only up the boundary of the higher-quality agricultural land to the east of the site. We confirm that our client has engaged a landscape architect to work up initial proposals to show how the existing boundaries could be bolstered. Please refer to the attached Delivery Statement for further details. The commentary in relation to 'long-line views' appears to relate to visual considerations. In a recent Supreme Court judgment, Lord Carnwath confirmed that there is no mandatory requirement to consider visual impacts as part of Green Belt openness and that the relevance of the visual dimension of Green Belt openness will turn on the facts of each case. Even if visual impacts on the Green Belt are assessed – which the recent Supreme Court Judgment has confirmed is not always required – we do not consider that the proposed development at SHLAA0927 will cause harmful negative visual impacts. As such, we do not consider that it assists in safeguarding the countryside from encroachment and therefore the site should be assessed as having a 'moderate contribution' to Purpose 3. Purpose 4: it is not possible to distinguish between the Green Belt Parcels in terms of their performance regarding Purpose 4, given that none of the Parcels are thought to preserve the setting of a historic town and so they all achieve the same score/rating. Purpose 5: all Green Belt Parcels perform equally in relation to Purpose 5, with all Parcels considered to make a 'moderate contribution'. The 'Overall Assessment' for Parcel 6.14 is that it makes a 'moderate contribution' to the Green Belt purposes. We believe that the commentary justifies a 'moderate contribution' rating in relation to Purpose 3, in which case the Parcel could conceivably have achieved an overall 'weak contribution' rating. Moreover, we believe that SHLAA0927, if it was assessed separately, would achieve an overall 'weak contribution' rating.						
1249782	LPIO-26419				We largely agree with the Council's classification of sites within the 2019 Green Belt Review and the assessment of the 46 sites which make a weak contribution to the Green Belt. We have commented separately on the 2019 Green Belt Review, in an earlier section within these representations, insofar as the assessment relating to the Raby Hall Road site.	<a href="https://wirral-consult.objective.co.uk/file/5683892">https://wirral-consult.objective.co.uk/file/5683892</a>					
1249219	LPIO-26458 1 of 2				The definition of weakly performing Green Belt is extremely questionable for many reasons, the main ones being outlined below. The key document for planning, the National Planning and Policy Framework document (NPPF), carries no reference to weakly performing Green Belt. In addition, to carry out this questionable analysis the Council chose ARUP whose views on the need to release Green Belt for building are publicised on their website. This hardly makes for any unbiased, objective assessment. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. The justification was, and remains, as valid now as it was then, in that it supports the main UDP themes of: concentrating development and investment within the existing urban areas; and improving the quality of the environment in the most blighted areas whilst protecting the environment elsewhere in the Borough. In addition, this is not currently in line with the Council's stated aim of a regeneration first policy. All Green Belt areas surely should be ascribed as strongly contributing to this purpose and this would fundamentally affect the overall conclusions, removing many areas from the so-called weak category. In their analysis of Green Belt areas, ARUP in their consideration of the role of Green Belt in preventing urban sprawl only consider urban sprawl as involving the east side of Wirral. This is our view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement and derive their evaluation from this. The Council's use of Settlement Areas, however, is a convenient management tool but should not be classified as one unique Settlement.	<a href="https://wirral-consult.objective.co.uk/file/5677529">https://wirral-consult.objective.co.uk/file/5677529</a>	<a href="https://wirral-consult.objective.co.uk/file/5677528">https://wirral-consult.objective.co.uk/file/5677528</a>				

Person ID	ID	Question 2.16c - Do you agree with the classification of sites set out within the 2019 Green Belt Review?	Site number / Reference:	Question 2.16b - Suggested alternative classification (please select):	Question 2.16c - Please give your reasons below. (If you don't agree with the Green Belt Review Methodology you can comment in the separate evidence consultation)	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6
1249219	LPIO-26458 2 of 2				This assumption is further compounded by the extremely narrow interpretation of a 'town' used by the consultants. Many other Local Authorities would take a much wider definition and recognise smaller towns /townships as being distinct entities in their own right. In our view this is much more in line with the ethos behind the purpose of Green Belt. In so doing, ARUP's evaluation gives no value to the function of Green Belt helping to keep places like Heswall, Barnston, Pensby and Irby as separate towns and forces all prevention assessments into the 'No Contribution' classification. Finally, in their assessment of some Green Belt Areas e.g. General Area 6 / Heswall the consultants state that although development would reduce the gap between settlements it would not reduce the perceived gap. This is a totally erroneous statement as visibility is not a valid factor, it is a landscape criterion which was not part of the ARUP remit. The 1983 Merseyside Green Belt area of Wirral, the 1998 reiteration and the further inclusions of 1988 and 2000 have stood the test of time. Given this, the review outcome that a strong contribution to Green Belt purposes is made by only 12 of the 100 parcels of land is simply not credible. In conclusion, the ARUP Green Belt Review is fundamentally flawed. Almost all the areas designated as 'weakly performing' are clearly NOT with respect to the Purposes of Green Belt. In addition, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt, which in the future will only grow in significance as sustainable, climate-controlling, pollution-reducing, and local food-producing farmland. Further, little regard is taken of the role Green Belt is playing now and will increasingly do so, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sporting activities, and the local economy, as well as protecting wildlife, their habitats and heritage. Finally, allowing new housing within Green Belt would actually stall rather than encourage much-needed regeneration elsewhere.						
1249665	LPIO-26501 1 of 3		SHLAA 4057	Moderate	General Area 9 is assessed as making a "moderate contribution" toward the Green Belt purposes. Only one General Area (6) was assessed as making a weak contribution. The Green Belt Review's assessment of Parcel 4.16 concludes that it makes a moderate contribution toward Green Belt purposes. We provide our review of SHLAA4057 performance against the five purposes of the Green Belt as follows: Purpose 1: Parcel SP051 is predominantly contained amongst urbanised edges on three sides and is dominated by a number of urban detractors, not least the presence of the neighbouring refinery. Development to the parcel would provide a logical infill of an enclave between Hooton Park industrial area and Eastham Refinery. Parcel 4.16 has a greater capacity to accommodate development without significantly contributing to urban sprawl, in comparison to the adjacent field network to the south east of the parcel (Parcel 4.14, located between Rivacre Road, New Chester Road and the M53), which on the contrary would result in significant and perceivable urban sprawl should it be developed. Purpose 2: Eastham is connected to the edge of Ellesmere Port by industrial development along North Road / Bankfields Drive, which also affects the setting of the Eastham Village Conservation Area. These areas of development are already joined physically, and the Green Belt therefore plays a role in protecting the separate characters of these areas, rather than achieving separation. This role can be maintained and even enhanced through careful design. As such, development of the parcel would not initiate a new merging of settlement or constitute a removal of an existing gap. There is an opportunity to enhance landscape and architectural quality of the existing connection between Eastham and Ellesmere Port through a considered and appropriate masterplan response, which could also maintain and enhance the appearance and distinctiveness of the Eastham Village Conservation Area.	<a href="https://wirral-consult.objective.co.uk/file/5683884">https://wirral-consult.objective.co.uk/file/5683884</a>	<a href="https://wirral-consult.objective.co.uk/file/5684867">https://wirral-consult.objective.co.uk/file/5684867</a>	<a href="https://wirral-consult.objective.co.uk/file/5683886">https://wirral-consult.objective.co.uk/file/5683886</a>			
1249665	LPIO-26501 2 of 3		SHLAA 4057	Moderate	Purpose 3: Development to the Site would infill an enclave between Hooton Park industrial area and Eastham Refinery. As such development to the parcel would not cause significant encroachment outwards into the countryside beyond the existing urban edge. The Parcel also includes a mix of land uses, including degraded and damaged areas of landscape and is compromised by the adjacency of the Eastham Refinery. Development to the parcel has opportunity to offer significant landscape enhancements to the Site, such as a more robust and biodiverse green infrastructure, which would introduce long term ecological benefits and amenity value. Rivacre Road and substantial vegetation to either side of it would act as a natural 'stop' to development. Purpose 4: Eastham Village is characterised by an offset from neighbouring modern residential and industrial development to the west, north and east by a band of greenspace, garden spaces and woodland, which wraps around the historic core. There is opportunity to maintain the extent of landscape buffer around the village with a considered masterplan response that provides separation of built form to the edge of the village in a manner which is consistent with the existing settlement. Purpose 5: It is acknowledged that development to the Site would not recycle derelict land, although a portion of the parcel comprises damaged and degraded landscape as a result of mixed land uses and industrialisation. Development has opportunity to significantly improve the quality of the eastern end of the parcel and would serve to stimulate further improvement to degraded land further to the east of the parcel within the Hooton Park industrial area.						
1249665	LPIO-26501 3 of 3		SHLAA 4057	Moderate	Our client's site at Eastham Hall (2019 SHLAA Ref. 4037) has been included within part of a much larger parcel (ref. 4.16), which the 2019 Green Belt Review considers makes a "moderate contribution" to the purposes of including land in the Green Belt. It is unclear why our client's site has not been included within parcels 4.15 or 4.18 which include the remainder of Eastham Village. The 2019 Green Belt Review concludes that parcels 4.15 and 4.18 make a "weak contribution" to the purposes of including land within the Green Belt. The conclusions made about parcel 4.16 clearly relate to the area of land outside of the village and not our client's site. Our client's site should be re-considered. It is unclear how all three of these parcels (i.e. 4.15, 4.16 and 4.18) have been defined as at the development options consultation in 2018, the Council identified 48 sites in the Green Belt for "further investigation", which included Eastham Village Conservation Area as one area (ref: SP052). The land within the Eastham Village Conservation Area is 31.19 ha in area. It is located to the east of New Chester Road associated with the junctions between Eastham Village Road, Rivacre Road, Stanley Lane and Ferry Road (to the south of St John's Road). As we have already explained above, our client's site at Eastham Hall is located within this site. The Summary of the Initial Green Belt Assessment (September 2018) explained that the Eastham Village Conservation Area has been located within the Green Belt since 1983. It set out three potential options: Option 52.1 – Retain SP052 in the Green Belt but, if needed, propose to identify a new Infill Village in the Green Belt; Option 52.2 - potentially be proposed for release from the Green Belt, alongside SP053 to SP055, to establish a revised Green Belt boundary to the south of Eastham Village; or Option 52.3 – release from the Green Belt, alongside SP053 to SP055 and SP049 to SP051, to establish a revised Green Belt boundary along the M53 Motorway.						

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1246736	LPIO-26562	no			Under each of the three options, the Conservation Area would have remained in place. Eastham Village Conservation Area should be investigated further as a single parcel as was proposed at the previous consultation. In doing so, the Council should have regard to chapter 13 of the NPPF and in particular the following paragraphs: Paragraph 133 of the NPPF explains that the essential characteristics of Green Belts are their openness and permanence. In this case, the entire village of Eastham is washed over by the Green Belt and therefore openness is reduced by the significant built form that exists within it. Paragraph 134 of the NPPF explains that the Green Belt serves five purposes. We set out our assessment of Eastham Village Conservation Area (ref: SP052) in this context below: a. Check the unrestricted sprawl of large built-up areas – the release of Eastham Village Conservation Area from the Green Belt would not result in unrestricted urban sprawl. The site is adjacent to existing residential development to the north and west and the KANEB Terminals are to the east. b. Prevent neighbouring towns from merging into one another – The release of Eastham Village Conservation Area from the Green Belt would clearly not lead to neighbouring towns merging into one another. c. Assist in safeguarding the countryside from encroachment – There would not be encroachment of the countryside because of the amount of development within the Eastham Village Conservation Area. d. Preserve the setting and special character of historic towns – The development of this site would not impact upon the setting and special character of a historic town. e. Assist in urban regeneration, by encouraging the recycling of derelict and other urban land – The development of the site would assist in urban regeneration by providing opportunities for much needed housing.						
1246736	LPIO-26563 1 of 2				Paragraph 136 of the NPPF explains that Green Belt boundaries should only be altered in exceptional circumstances through the preparation or updating of plans. This is the case in the Wirral because as we have set out above, Wirral cannot meet its housing needs without the release of some Green Belt land. Paragraph 137 of the NPPF explains that before concluding that exceptional circumstances exist, the Council will need to be able to demonstrate that it has fully examined all reasonable options for meeting its identified need, including (a) making as much use as possible of suitable brownfield sites and underutilised land, (b) optimising the density of development in town and city centre locations and (c) confirmed that neighbouring authorities cannot accommodate some of the identified need for development. Paragraph 138 of the NPPF states that where it has been concluded that it is necessary to release land from the Green Belt for development, plans should give first consideration to land which has been previously developed and / or is well served by public transport. Both of these circumstances apply to Eastham Village Conservation Area (ref: SP052) because much of the village is previously developed and it is also well served by existing bus routes to Chester, Liverpool, Birkenhead and other locations within the Wirral. Paragraph 139 of the NPPF states that when defining Green Belt boundaries, plans should (amongst other things): (b) not include land which it is unnecessary to keep permanently open – as above, the openness of Eastham Village Conservation Area is already limited to the amount of development within it.						
1246736	LPIO-26563 2 of 2				c) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and d) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent – this would be the case with Eastham Village Conservation Area, which under options 52.2 or 52.3 in the development options paper would establish a revised Green Belt boundary to the south of the village (option 52.2) or along the M53 boundary (option 52.3). Paragraph 140 of the NPPF is particularly important in relation to Eastham Village Conservation Area. It states: "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 development management policies, and the village should be excluded from the Green Belt." On this basis, because it is not necessary to restrict development in Eastham Village as it does not have an open character that makes an important contribution to the openness of the Green Belt, it is not necessary to retain the village in the Green Belt. It is already within a conservation area and therefore the village should be excluded from the Green Belt as conservation policies provide sufficient protection. Within the context of all of these paragraphs of the NPPF, the village should be released from the Green Belt.						
1240932	LPIO-26595	no			No, we disagree with the classification of some sites set out within the 2019 Green Belt Review. The attached response to the methodology and findings of the review has been prepared by us. We support the classification of sites as performing weakly and the Council's decision to potentially allocate them for development within their Options. Our assessment reapplies the review methodology and concludes that, contrary to the findings of the review, a number of Green Belt parcels which were considered to make a moderate contribution actually make a weak contribution to the purposes of the Green Belt. These parcels include: Parcel 4.3 (SHLAA1962); Parcel 7.22 (SHLAA1952); Part of Parcel 5.14 (SHLAA4035); and south of Thornton Hough GB Parcel 65 within washed over village. We recommend that these parcels should therefore remain in or be included within the Council's site selection process.	<a href="https://wirral-consult.objective.co.uk/file/5683689">https://wirral-consult.objective.co.uk/file/5683689</a>	<a href="https://wirral-consult.objective.co.uk/file/5682697">https://wirral-consult.objective.co.uk/file/5682697</a>	<a href="https://wirral-consult.objective.co.uk/file/5682701">https://wirral-consult.objective.co.uk/file/5682701</a>			
1245180	LPIO-2662	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land MUST be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						

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1249947	LPIO-26659 1 of 3		Parcel 7.11 SHLAA1549 /0878/3050 /1817	Weak	Sites/parcels have been assessed in relation to all five of the Green Belt purposes, which we agree is the correct approach. In terms of a 'finer grain' analysis, we note that our site has been assessed as part Green Belt Parcel 7.11, which has also been identified as having a 'weak' overall contribution to the Green Belt. Notwithstanding the fact that Parcel 7.11 as assessed within the Green Belt Review appears to be more akin to Green Belt Parcel SP071, and therefore includes additional land which is not identified for potential release as part of the dispersed Green Belt release. Option2A, we support the Council's decision to assesses this wider parcel of land which is bound by strong defensible boundaries on all sides. Whilst we support the Council's overall assessment, we provide our own observations regarding the Council's assessment of Parcel 7.11 (SP071) against the five Green Belt purposes below. Purpose 1: The Review finds that Parcel 7.11 makes 'no contribution' to Purpose 1. The Council's finding reflects the fact that the land parcel is surrounded by built development on three sides and is bounded by Chester Road to the south as well as the Borderlands railway line to the east. Those physical features represent readily recognisable boundaries which, by their nature, are highly likely to be permanent and restrict sprawl. As such, we agree the Council's assessment that the land parcel does not contribute to Purpose 1. Purpose 2: In a similar manner, the Council's assessment finds that finds that Parcel 7.11 makes 'no contribution' to Purpose 2. In relation to this purpose, we reiterate that the land parcel is enclosed to the east by a railway line and to the south by Chester Road, both of which represent enduring boundaries. Accordingly, there is no potential for further expansion beyond those boundaries and so there is no possibility of Heswall coalescing with the nearest settlement to the south (Parkgate / Neston), or any other settlements. Furthermore, we wish to highlight that the Council's 'Summary of Initial Green Belt Assessment' document (dated September 2018) recognises the characteristics outlined above and confirms that Parcel SP071 (which corresponds to Parcel 7.11) has 'No strategic separation function' (page 136).	<a href="https://wirral-consult.objective.co.uk/file/5683693">https://wirral-consult.objective.co.uk/file/5683693</a>					
1249947	LPIO-26659 2 of 3		Parcel 7.11 SHLAA1549 /0878/3050 /1817	Weak	Purpose 3: The Review finds that land Parcel 7.11 makes a 'moderate contribution' to Purpose 3. Whilst acknowledging that the land parcel is relatively contained by Settlement Area 7 and has a limited connection to the countryside along one boundary, which consists of a railway line, which is a durable boundary which would prevent encroachment beyond the parcel if it were developed, the Council's assessment in respect of this purpose states that the parcel "supports a beneficial Green Belt use as it provides some significant opportunities for outdoor sport and recreation" and that "long-line views into and out of the parcel but views to the east are enclosed by the railway line. There is some low vegetation. Therefore, the parcel supports a strong-moderate degree of openness". Firstly, we note that the Council's assessment has considered that the recreational facilities which form part of Parcel 7.11 as a 'Green Belt use'. Whilst we are unclear what is meant by this statement – which does not appear to relate to Purpose 3, we wish to highlight that the recreational land to the north of the Green Belt Review Parcel 7.11 is not included as part of Parcel 7.11 which is identified as a proposed dispersed Green Belt release option within the I&O document. To this effect, we note that the Council's Interim Green Belt Assessment, which is appended to the I&O document, states that Gayton Park should be excluded from the developable area of Parcel 7.11. In relation to the assessment of openness, the commentary in relation to 'long-line views' appears to relate to visual considerations. In a recent Supreme Court judgement, Lord Carnwath confirmed that there is no mandatory requirement to consider visual impacts as part of Green Belt openness and that the relevance of the visual dimension of Green Belt openness will turn on the facts of each case. In the case of the Parcel 7.11, we consider that the visibility of proposed development on the site will be limited as a result of the existing built form and urban character of Heswall, together with the flat wooded and enclosed character of the surrounding local landscape including trees, hedgerows and woodlands. As such, even if visual impacts of the Green Belt are assessed – which the recent Supreme Court has confirmed is not always required – we do not consider that the proposed development of the site will result in harmful negative visual impacts. As such, we do not consider that Parcel 7.11 assists in safeguarding the countryside from encroachment and therefore the site should be assessed as applying 'no contribution' to Purpose 3.						
1249947	LPIO-26659 3 of 3		Parcel 7.11 SHLAA1549 /0878/3050 /1817	Weak	Purpose 4: It is not possible to distinguish between the Green Belt Parcels in terms of their performance regarding Purpose 4, given that none of the Parcels are thought to preserve the setting of a historic town and so they all achieve the same score/rating. Purpose 5: As with Purpose 4, all of Green Belt Parcels perform equally in relation to Purpose 5. Like all assessed sites, Parcel 7.11 is considered to make a 'moderate contribution' to this purpose. We support the Council's overall conclusion that the site makes a 'weak' overall contribution to the purposes of the Green Belt and agree with the commentary that the site has a 'weak connection to the countryside along a durable boundary which could contain development and prevent encroachment.'						
1245058	LPIO-2701	no			Important natural habitats should be kept as such. Wirral Borough Council also passed a motion to the effect that agricultural land should not be included in any SHLAA.						
1245073	LPIO-2897	no			I do not accept the premise that some Green Belt land and settlements are "Weakly Performing". They are more important now than ever before in addressing the five purposes that they were set up for. The whole classification process is subjective and unreliable. Its funny how the sites that are classed as making the least contribution also happen to be the prime development sites with developers and landowners keen to put them forward for housing. I disagree strongly with the classification of the Green Belt sites that I am familiar with near where I live and will comment on them separately. The only 'exceptional' circumstances that I can see associated with the potential release of Green Belt is the vastly exaggerated and unjustifiable figure of 12,000 homes that the Council claims are needed. If this figure is reduced to something more realistic then there will be no need to build any of the 2,500 homes that the Council claims may be required on Green Belt. It also contravenes a motion passed by the Council in October 2019 that agricultural land should not be included in any SHLAA and must be kept as agricultural land. The Council bangs on about protecting our environment and heritage. More recently, guarding against climate change has emerged as another key headline amongst the Council's key objectives. Trees and plants absorb carbon dioxide; houses don't. We can't afford to sacrifice Green Belt just to allow developers and landowners to get rich.						
1245159	LPIO-2965	no	SP013 West of Column Road below Stapledon Woods	High	Green belt and green space on Caldwy Hill and Stapledon Woods links into the green belt between Thurastaston Hill, the Caldwy Rugby Club area down to the Wirral Way and the foreshore. It is important to keep this area as unified Green Belt and Green Space to the west of Column Road. The fields proposed for development also are arable land regularly cropped and should be retained as productive arable land. The location also has no local services in terms of schools or shops which will general traffic and parking issues in West Kirby (especially round St Bridget's School) and other local centres.						



Person ID	ID	Question 2.16a - Do you agree with the classification of sites set out within the 2019 Green Belt Review?	Site number / Reference:	Question 2.16b - Suggested alternative classification (please select):	Question 2.16c - Please give your reasons below. (If you don't agree with the Green Belt Review Methodology you can comment in the separate evidence consultation)	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6
1244896	LPIO-3016	no	All Sites within Option 2A and 2B and others classified 'weakly performing'.	High	Additional Response to Q2.16 We have shown how we consider the 2019 Green Belt Review is thoroughly flawed in both methodology and conclusions. Its classification of swathes of Green Belt as 'weakly performing' is based on extraordinary interpretation of the Purposes of Green Belt and a lack of taking account how they apply in the 'exceptional circumstances' of the Wirral. Not only are most areas classified too lowly, there is a complete lack of spread of degree of contribution and difference. This is illogical and poor science. Overall classifications for Sites: High: 4.13, 6.15, 7.18, 7.19, 7.25, 7.27 Moderate to High: 5.8, 7.11, 7.26 (SP059B, C, D) Moderate: 5.9 These are relative assessments but the overall conclusion we've reached is that NONE of the Green Belt Sites qualifies nor is needed for release. There are no grounds, 'exceptional circumstances', FOR the Council to release ANY Green Belt. In addition to the uploaded documents and evidence of our earlier Responses, we would refer assessors to a further Report produced by Graham Stevens (File Ref. Wirral Household Projections and Standard Method IOD). Please take account of the section relevant to this Question.	<a href="https://wirral-consult.objective.co.uk/file/5677112">https://wirral-consult.objective.co.uk/file/5677112</a>					
1241315	LPIO-3036	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land MUST be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1245287	LPIO-3070	yes									
1237944	LPIO-308	yes									
1238645	LPIO-3082	no			Agricultural land must be kept as such. Wirral Borough Council passed a motion to the effect that Agricultural land should not be included in any SHLAA.						
1237904	LPIO-3167	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land MUST be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA						
1238156	LPIO-32	yes			This is always a sensitive area, for understandable reasons, but the sense I have is that the authority does recognise this in the classification work that has been done. Where I believe the authority does seem to me to run into problems, is when proposals that touch upon or affect the green belt seem to be considered before or in advance of brownfield development. Where brownfield sites are privately owned, this can be a challenge, but one which I would urge the authority to tackle first.						
1245158	LPIO-3222	no			the review fails to take account of the productive nature of the green belt - ie its contribution to climate control, food production etc.It also aids tourism, animal habitat and leisure pursuits						
1245320	LPIO-3228	no		High	I have a strong objection to the proposed release of greenbelt parcel 6.15 under option 2A in the plan. Parcel 6.15 makes a strong contribution to the 5 key purposes of the green belt. 1. 6.15 makes a strong contribution to avoiding unrestricted sprawl of urban area 2. 6.15 makes a strong contribution to prevention of towns West Kirby & Caldy merging. 3. 6.15, we have significant concerns over the following characterisation of the site: "Because the parcel forms a 'finger' of Green Belt within Settlement Area 6, it is not well connected to the countryside". The NPPF does not refer to connectivity of 'fingers' to the countryside. The site either is or is not in the countryside, therefore its development would represent encroachment. 4. 6.15 immediately adjacent to Caldy Conservation Area, has not in our view been properly assessed by the Council 5. 6.15 makes a strong contribution to encouraging the recycling and regeneration of derelict & urban land elsewhere in the borough. This is because the parcel is an open green field site.						
1245346	LPIO-3255	no			Particular concern is the development of prime agricultural farmland and important natural habitats. • Agricultural land must be kept as such. Wirral Borough Council passed a motion to the effect that Agricultural land should not be included in any SHLAA.						
1239571	LPIO-3346	no			The ARUP argument and classification seems deeply flawed and inadequate. It fails to meet all the criteria which you lay down at the opening of this section i.e. avoidance of sprawl, merging and encroachment. In particular, it shows little sensitivity to special character. My full comment on parcels 7.1-7.5 was rendered in response to your own review. Development of these areas would constitute further erosion of the Dee coastal countryside fringe which is especially valued by those coming out of the built up urban areas to seek recreation and refreshment.						
1245416	LPIO-3361	yes									
1238549	LPIO-344	no	7.25 Sandy Lane.	High	Sandy Lane, Irby is the village boundary and bounds an area used as amenity for the residents of Wirral, EG. Royden Park, Thurston common. It bounds the site of the old Roman Road which extends down Sandy lane into Sandy Lane North. The field contain a haven for local wildlife and also protected Trees. Incursion onto this belt would damage the overall atmosphere and wellbeing of the area the environmental impact would be significant and goes against the purpose and objectives of Green belt as envisaged for Wirral.						
1240653	LPIO-3470	yes									
1241770	LPIO-3472	yes									
1245437	LPIO-3507	no									
1245451	LPIO-3544	no	SP013 West of Column Road	High	Green belt and green space on Caldy Hill and Stapledon Woods links into the green belt between Thurston Hill, the Caldy Rugby Club area down to the Wirral Way and the foreshore. It is important to keep this area as unified Green Belt and Green Space to the west of Column Road. The fields proposed for development also are arable land regularly cropped and should be retained as productive arable land. The location also has no local services in terms of schools or shops which will general traffic and parking issues in West Kirby (especially round St Bridget's School) and other local centres.						
1245457	LPIO-3609	no			Para 134 of the NPPF is quite specific in its aims. If you build on green belt, you are in contravention of these aims. As to weakly performing parcels, some imaginative thinking is required. Maybe the amount of agricultural land is too high, but we all know there is a climate emergency. How about re-creating forested areas, with financial encouragement for land owners to do so?						
1245443	LPIO-3681	no		High	it far too important to even think about using greenbelt areas as proposed building and development						



Person ID	ID	Question 2.16c - Do you agree with the classification of sites set out within the 2019 Green Belt Review?	Site number / Reference:	Question 2.16b - Suggested alternative classification (please select):	Question 2.16c - Please give your reasons below. (If you don't agree with the Green Belt Review Methodology you can comment in the separate evidence consultation)	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6
1244629	LPIO-4514	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land MUST be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA. The Council has recognised that we have a 'Climate Emergency'. A Council Motion was passed unanimously stating that NO productive agricultural land will be released for development. The Local Plan Options does not adhere to this commitment						
1244720	LPIO-4597	no	All sites	High	The review is not necessary because WBC's calculation of housing need is flawed. Based on the information and evidence available from their own commissioned reports, the number of new homes will be much smaller than 12,000 over 15 years. In terms of the review: It is not clear how green belt which is designated as "weakly performing" has been calculated. Green belt in its entirety meets the 5 purposes, and if there was no reason to include land in green belt, it would not have been designated as such. Release of greenbelt counteracts the Council's obligations to preserving habitat and protecting wildlife under various legal and statutory duties, and their commitment to mitigating Climate Change.						
1237724	LPIO-4600	no	7.15/SP062 and SP061	High	This parcel of land has been selected for potential development on the grounds that it is "weakly performing" and this is in agricultural terms consequent on a report produced by ADAS for the WBC in 2019. According to their own website ADAS specialises in planning developments in rural areas, edge of town locations and greenfield sites so there just might be a conflict of interest. This land should not have been considered because to develop it would break all of the strictures against developing on greenbelt land. It would close up separate villages and has no infrastructure suitable for such a large development being just a couple. WBC had very much feedback in the previous consultation. The ADAS Agricultural report is desk based and highlights the need for further studies to determine the value of the land in question. "The survey can only be considered to be indicative, since estimates and extrapolations are made from the responses" and responses were very low. There is reference by ADAS to information being withheld. ADAS classifies this land as Managed or Permanent Grassland which is incorrect since a variety of crops are successfully grown each year and over three years which I can personally attest to. This before the turving off of the then tenant farmer of Manor farm whose family had farmed the land for three generations and who had a magnificent herd of Old English Cattle and a Farmshop on Barnston Road, all now lost to the community. I attach a number of photos which demonstrate that land is good arable land. As I write the parcels SP061 and SP062 are being planted in Barley. So how did this mis-attribution come about - is it simply that the absentee landlord wants to sell and the Council is looking for land - hardly any basis for planning especially since to go ahead breaks all the planning guidelines in respect of building on green belt land.  <a href="https://wirral-consult.objective.co.uk/file/563316">https://wirral-consult.objective.co.uk/file/563316</a>						
1237696	LPIO-4684	yes									
1242528	LPIO-474	no			more sites should be allowed to regenerate creating links between existing parcels of green land. no green areas should have any development allowed						
1237873	LPIO-4823	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land MUST be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1245782	LPIO-4858	no			If the council wish to have a genuine brownfield only option, they should not include options to build on the Green Belt. The public will only comment on the parcels of land mentioned in the Issues and Options document as this document gives the impression that all other Green Belt sites are safe, whereas land owners and developers will be lobbying for the release from the Green Belt of the parcels of land they have an interest in. The council has to demonstrate exceptional circumstances before there are any changes to Green Belt. Production of a new Local Plan alone is not a valid reason.						
1245794	LPIO-4902	no		Weak	"Weakly performing Green Belt"? Not a legitimate planning term with any grounding in the NPPF. ARUP do not look impartial, from their website credentials. Their analysis is weird and flawed - Green Belt was not formed to aid Urban Regeneration. It has highly-valued (by residents) other functions. Green Belt areas are not "weakly performing" for the purposes they were set up to deliver. They don't consider existing urban sprawl in western Wirral only eastern. They adopt WBC's fallacious "Settlement" definition. They don't recognise the value of Green Belt (amongst many other values) in keeping Heswall, Barnston, Irby and Pensby as separate and distinct townships. Green Belt has many productive benefits - both economic and environmental - given inadequate value in this poor piece of work.						
1241661	LPIO-4921	no			A particular concern is the development of prime agricultural farmland and important natural habitats. Agricultural land must be kept as such. Wirral Borough Council passed a motion to the effect that Agricultural land should not be included in any SHLAA.						
1243171	LPIO-4943	no	all sites		There is no official designation or definition of weaker and moderate green belt. It is all green belt and for a good reason that it protects Wirral from despoilation by urban sprawl and forces development into areas which need regeneration. In addition, when one piece of "weaker" green belt is released, the adjoining piece which may have been "moderate" becomes "weaker" and so on until it is all used up.						
1241327	LPIO-4958	no		High	SP062 (and by extension SP061) were to be released and developed the boundary between Pensby, Barnston, Heswall and Thingwall would be merged further. SP062 includes a large number of core Bio-diversity areas that would be adversely affected. The initial assessment states that the area SP062 is: "Part of the Landcan and Thingwall Rural Fringe Landscape Character Area, where the quality and condition of the landscape is moderate and the landscape strategy for the character area is 'enhance'. Any change in the landscape should respect the rural character of Barnston and Landcan and reflect their association with farming." Owing to its elevated position in the landscape would immediately impact on the character of the Barnston Village area and serve to significantly impinge upon the villages character and relationship to farming through loss of farming land. SP062 has been identified as "The best and most versatile agricultural land". The borough's current unitary development plan "Policy AG1 - The Protection of Agriculture" explicitly states that when considering development the local planning authority "will seek to prevent the loss of Wirral's best and most versatile agricultural land". I would like it to be noted that the land is currently being farmed actively and that post-Brexit it will be essential to retain such high quality agricultural land. The new Agriculture Bill will stress the importance of producing our own "high quality food." The new policy "will reward farmers for helping to enhance the environment not for how many acres they own."						

Person ID	ID	Question 2.16 - Do you agree with the classification of sites set out within the 2019 Green Belt Review?	Site number / Reference:	Question 2.16b - Suggested alternative classification (please select):	Question 2.16c - Please give your reasons below. (If you don't agree with the Green Belt Review Methodology you can comment in the separate evidence consultation)	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6
1245713	LPIO-5001	no			Agricultural land must be kept as such. WBC passed motion in 2019 that agricultural land should not be included in any SHLAA						
1245867	LPIO-5009	no		High	I object very strongly to the proposed release of Parcel 6.15 from the Green Belt, under option 2a. This parcel makes a strong contribution towards its 5 key purposes. West Kirby forms part of a long stretch of urban form, making a large urban area. 6.15 is important in restricting further sprawl of urban areas. It is the only open space separating West Kirby and Caldy, two separate towns. It is an important part of the countryside and abuts Stapledon Wood, an area of high biodiversity. In addition, 6.15 abuts Caldy Conservation area, which the Council appears to not take into account. The Council lumps all Green Belt together as supporting urban regeneration. Therefore logically, they are all important in their contribution and cannot be called 'weak' or 'moderate' in their importance.						
1245816	LPIO-5017	no			I am mystified and horrified that the plan seems to identify Green Belt areas that make 'no' or 'weak' or even only 'moderate' contributions to the Green Belt. In my opinion, ALL Green Belt land is precious and complies with my understanding of why Green Belt policy was introduced in the first place. Green Belt space significantly enhances the lives of Wirral citizens.						
1237923	LPIO-5046	no	spo59e	No overall contribution	WBC passed a motion in Oct 2019 to the effect that agricultural land should not be included in any SHLAA. Agricultural land must be kept as such. Land can not be classed as "weakly performing green belt" but as they are preventing urban sprawl they are actually performing their function as greenbelt in a highly effective manner.						
1245496	LPIO-5196	no			I do not agree with the classification of weakly performing parcels and settlement. Agricultural land must be kept as such.						
1238246	LPIO-526	no	7.27	High	Parcel 7.27 (SP059 (West of Irby Road)) Cannot possibly be correctly defined as weakly performing greenbelt land. This corridor of green space is the land separating the distinct village of Irby, from the developments in Pensby, Heswall and Thingwall. Should this parcel of land be developed then it would lead to urban sprawl. There is significant benefit to this green belt land, both recreationally, healthwise and in its separation of Irby from Pensby. It encompasses Harrock Wood which is a small dale containing large mature woodland, and many native species such as bats which are under threat. To build around it would endanger the wildlife, ruin the character of Irby and place unbearable strain on the areas roads, schools, health facilities, shops etc. This land by any lay-persons definition is performing highly in its function in preventing urban sprawl and maintaining the character of Irby as a distinct village.						
1240383	LPIO-5416	no			Wirral's Green Belt serves all five purposes identified in the NPPF. The Barnston Community has prepared a separate response to the ARUP Green belt review 2019 which is attached. This review seeks only to identify Green Belt land which is most suitable for release for development and thus fails its purpose.						
1246030	LPIO-5469	no	Parcel 6.15		I object strongly to the proposed release of Green Belt Parcel 6.15 under Option 2A in the Plan. Parcel 6.15 makes a strong contribution towards the 5 key purposes of the Green Belt as set out within the NPPF. see additional notes attached.	<a href="https://wirral-consult.objective.co.uk/file/565632">https://wirral-consult.objective.co.uk/file/565632</a>					
1246035	LPIO-5477	no			I object strongly to the proposed release of Green Belt Parcel 6.15 under Option 2A in the Plan. Parcel 6.15 makes a strong contribution towards the 5 key purposes of the Green Belt as set out within the NPPF.	<a href="https://wirral-consult.objective.co.uk/file/565639">https://wirral-consult.objective.co.uk/file/565639</a>					
1245954	LPIO-5490	yes									
1245607	LPIO-5498	yes									
1237823	LPIO-5579	no		Weak	No – NPPF (Paragraph 134) identifies that the Green Belt serves five main purposes: a) To check unrestricted sprawl; b) Prevent neighbouring towns from merging; c) Safeguarding the countryside from encroachment; d) Preserving the setting and character of historic towns; e) Assisting urban regeneration. NPPF advises in paragraph 138 that development should be channelled towards urban areas inside the Green Belt boundary. Paragraph 139 of NPPF advises when defining Green Belt boundaries, plans should not include land which is unnecessary to keep permanently open and must define boundaries clearly using physical features that are readily recognisable and likely to be permanent. The M53 is a clearly defined and recognisable, permanent physical feature. Therefore, Wirral Council's assessment of Green Belt boundaries ought to have led to the conclusion that the optimum location for redefining Green Belt boundaries and prospective release of Green Belt land for development is in the M53 corridor. The release of land in the M53 corridor does not compromise the integrity of Hoylake, West Kirby and Heswall from the main urban area. It does not result in the coalescence of towns. There would be no encroachment of developed into the open countryside. It would accord with the provisions of NPPF relation to the purposes of the Green Belt and the need to define boundaries having regard to recognisable and permanent physical features. Development in this location would also complement the Council's strategy of directing development to the 'Urban Conurbation'.	<a href="https://wirral-consult.objective.co.uk/file/5656321">https://wirral-consult.objective.co.uk/file/5656321</a>					
1246159	LPIO-5589	yes									
1245984	LPIO-5699	no			No – all green belt sites are essential. By designating a site as "weakly performing" it implies it is not as much value as the rest of the green belt. All green belt is of value as stated in 2.11.2 "Paragraph 134 of the National Planning Policy Framework (NPPF) sets out that "Green Belt serves five purposes: 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; and e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land." Chipping away at the Green Belt undermines these purposes and once gone it cannot be retrieved.						
1241868	LPIO-5744	no			No Green Belt land should be released for development. Green Belt land is vital for agriculture, tourism, biodiversity, heritage, climate protection, landscape quality, health of residents						

Person ID	ID	Question 2.16 - Do you agree with the classification of sites set out within the 2019 Green Belt Review?	Site number / Reference:	Question 2.16b - Suggested alternative classification (please select):	Question 2.16c - Please give your reasons below. (If you don't agree with the Green Belt Review Methodology you can comment in the separate evidence consultation)	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6
1245767	LPIO-5847	no			I have already questioned the need for any incursion into the Green Belt believing there to be more than sufficient developable brownfield land to meet actual housing need during the plan period. Furthermore, I am puzzled by the classification of Green Belt areas by quality. There is reference to 'weak' areas when measured against the purpose of Green Belt – essentially to avoid Urban Sprawl. I am particularly concerned that the areas referenced 7.15 – 7.18 have been classified as 'Weak' and identified for potential release. In my view these areas do exactly what the purpose of Green Belt intends. Their release for development would create the Urban Sprawl that Green Belt is, by definition, intended to avoid. It would also remove the extremely valuable separation that currently respects and supports Barnston's own character and identity.						
1246303	LPIO-5873	no	SP062	High	I do not agree with the classification of weakly performing parcels or settlements - who knows what this will come to mean in the future. Agricultural land MUST be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA. I am aware that site SP062 (Barnston Road) is currently planted for agriculture and has both good accessibility and size to make it a very efficient area for farming.						
1242751	LPIO-591	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land and livestock (including horses) accommodation land MUST be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1246310	LPIO-5917	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land MUST be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA!!!!						
1241133	LPIO-60	no									
1246345	LPIO-6057	no			ALL green belt is valuable - from the perspective of local agriculture (even more important with potential supply chain issues due to Covid/Brexit), climate change and providing outside space in the face of greater densities of housing (especially flats).						
1246306	LPIO-6066	no			The classification of green belt into levels of contribution seems to be a clumsy attempt to pave the way to boundary change. Strange that the local authority should give such weight to compliance with the NPPF on matters of housing numbers (para 60) suggesting we have no 'exceptional circumstances' to challenge those numbers, but then claim 'exceptional circumstances' in order to run roughshod over the directive of NPPF para 136 concerning green belt boundaries.						
1246339	LPIO-6097	no			I believe the greenbelt should not be built upon and disagree with the assessment in identifying areas with a weak or strong contribution. It should be kept in its entirety						
1238310	LPIO-6127	no	7.25 part sp009	Moderate	The greenbelt performs its 5 purposes as a whole. The subjective isolation of small parcels to grade them does not reflect their effective strength. Arup overall strength assessment map shows all the parcels selected in options 2a and 2b are in area 3 strong greenbelt. WBC has ignored this and viewed sites in isolation contrary to try and justify greenbelt release. A weak parcel does not constitute or prove an exceptional circumstance exists to release greenbelt as intimated by WBC. WBC changed the parcel boundaries. Arup's report states re-assessments will be required Arup's decision to select one 'large built up area' puts every greenbelt parcel on the West of Wirral at a 'points' disadvantage. Purpose 1 urban sprawl and purpose 3 prevention of encroachment are recognized (PAS guide 2015) as overlapping. Double scoring the sites in the east for 1 and 3 gives an unbalanced result. Purpose 4 and 5 being marked equally for all sites magnifies the imbalance The encroachment test is to ask how durable the boundaries of a site are. Permanent and durable boundaries (a road) are assessed as weak in preventing encroachment? WBC Planners 1 spoke to said roads are designed to have houses both sides. The road offers an invitation to encroachment. The basis of assessment is incorrect. Arup application of professional judgement failed to consider .5.1 "Planning on the Doorstep: The Big Issues - Green Belt" (Planning Advisory Service, Updated February 2015) Purpose 2 The identity of a settlement is not determined just by the distance to another settlement; instead the character of the place and the land between settlements must be acknowledged. A Landscape Character Assessment is therefore a useful analytical tool to use in Purpose 2 and 3 PPG (2019) para 001, which is relevant to site 7.25, area of special landscape Openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume						
1240964	LPIO-6157	no		High	All greenbelt should be left alone, a unique element of the Wirral is our high density housing interspersed with wide open spaces and farmland. If this pandemic teaches us nothing else then it should be that we can't predict the future but in times of National need our ability to produce food is crucial, you can't turn brown field sites over to food production when the Nation needs it urgently but with greenbelt you already have some adaptable capacity						
1246161	LPIO-6222	yes									
1245086	LPIO-6269	no			I don't believe any of this land should be built on. Once any land is released for building development it is the thin end of the wedge & who knows where if at all the development will end. Now that we have decided to leave the EU (an extraordinary act of self-harm), we need all the agricultural land we have & certainly can't afford to build on it.						
1246402	LPIO-6400	no			The classification of weakly performing parcels or settlements is not something I can agree with Agricultural land should be kept as agricultural land and not be blighted by development. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						

Person ID	ID	Question 2.16 - Do you agree with the classification of sites set out within the 2019 Green Belt Review?	Site number / Reference:	Question 2.16b - Suggested alternative classification (please select):	Question 2.16c - Please give your reasons below. (If you don't agree with the Green Belt Review Methodology you can comment in the separate evidence consultation)	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6
1246425	LPIO-6536	no		No overall contribution	We disagree with the Detailed Green Belt Parcel Assessment Table (Appendix G of the 2019 Green Belt Review ("the Review")). The Review states that the Urban Conurbation is already merged with Ellesmere Port and so it follows that the development of parcel 4.14 (SP050 West of Rivacre Road (parcel 4.14)) makes no contribution to the Green Belt purpose of preventing neighbouring towns merging into one another because they are already merged. The Review also states that the development of parcel 4.14 would result in further merging of the Urban Conurbation and Ellesmere Port, however, this makes no sense because towns are either merged or they are not. A purpose of the Green Belt is to prevent neighbouring towns merging into one another and so if the towns are already merged then that part of the Green Belt serves no purpose. It is not a purpose of the Green Belt to prevent further merging of towns that are already merged as the Review says. The reclassification of this purpose in the assessment table for parcel 4.14 from a moderate to no contribution would result in an overall assessment of either a no or weak contribution. The 2019 Green Belt is also at odds with previous local plan evidence on the Green Belt (September 2018), which concluded that site SP050 West of Rivacre Road (parcel 4.14) warranted further investigation for green belt release and that whilst David's Rough would need to be protected the site may also be suitable for employment uses. There is no clear reasoning in the 2019 Green Belt review for a fundamental change in position from the previous evidence. Subsequently, parcel 4.14 (SP050 West of Rivacre Road (parcel 4.14)) should be included in Table 4.5 (areas of land that could potentially be released from the Green Belt). See attached report for full comment.	<a href="https://wirral-consult.objective.co.uk/file/5669559">https://wirral-consult.objective.co.uk/file/5669559</a>					
1241723	LPIO-6556	no			Of particular concern is the development of prime agricultural farmland and important natural habitats. Agricultural land must be kept as such. Wirral Borough Council passed a motion to the effect that Agricultural land should not be included in any SHLAA.						
1246348	LPIO-6583	no			No such thing as weakly performing green belt. No attractive green spaces should be developed on. Local residents use small green spaces to walk dogs, children play games and football. It is not necessary to build on such spaces as we all know, whether we admit it or not, 12,000 houses are not needed in Wirral.						
1246444	LPIO-6759				The Green Belt was created to maintain the rural nature of this beautiful area. Building on this "protected" land should be as a very last resort. A council representative at the consultation meeting said that brown field sites already acquired will provide land for 10,000 houses. She added that landowners that were willing to sell land were being traced to for sites to build the remaining 2,000 houses. Develop the brown field sites first and while those houses are being built council can continue to trace the landowners that agree to sell land for the remaining 2,000 houses. Building on brown field or private land only will ensure that the Green Belt remains intact rather than selling to profiting building contractors, reaping huge council tax benefits and causing social infrastructure nightmares.						
1246401	LPIO-6917	no			I strongly disagree with classification of sites termed 'weak'. How is this measured and how can there be such a thing when all green belt is precious and appreciated by residents and visitors alike? Farmed and agricultural land is an essential part of our Wirral landscape.						
1246482	LPIO-7015	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land MUST be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1246488	LPIO-7114	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land must be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1241025	LPIO-7339	no		No overall contribution	Paragraph 136 of the NPPF states that Green Belt boundaries "...should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans." There are no exceptional circumstance to change the already set Green Belt boundaries, all housing needs can be satisfied using regeneration or the use of brown field sites.						
1241958	LPIO-737	yes									
1246551	LPIO-7473	yes			In response to Q2.16 with the soundness of the plan hinging on the deliverable, developable and achievable development of 12,000 new dwellings the Local Plan should maximise development densities on sites within urban areas – particularly the object site – to make the most efficient use of urban land. Prior to making any decision on the need to take land out of the existing Green Belt the Local Plan should ensure all deliverable and developable urban land has been allocated for housing development and this particularly relates to the opportunity for Paulsfield Drive Woodland to deliver 100% affordable housing at a high residential density for the Borough within an existing urban area. The particular site is presently underutilised land that forms a reasonable option for meeting identified development need prior to considering Green Belt land as an option. The site constitutes an option for the Council's preferred option to identify sufficient 'deliverable' land to meet development needs within the existing urban area. Paragraph 99 of National Planning Policy Framework states designation of land as Local Green Space should be consistent with local planning of sustainable development and complement investment in sufficient homes. Furthermore, NPPF (para. 99) states that Local Green Spaces should only be designated when a plan is prepared or updated and be capable of enduring beyond the end of the plan period. Paragraph 100 of NPPF states that Local Green Space should only be used where the green space is demonstrably special to a local community and holds a particular local significance.	<a href="https://wirral-consult.objective.co.uk/file/5679671">https://wirral-consult.objective.co.uk/file/5679671</a>					

Person ID	ID	Question 2.16a - Do you agree with the classification of sites set out within the 2019 Green Belt Review?	Site number / Reference:	Question 2.16b - Suggested alternative classification (please select):	Question 2.16c - Please give your reasons below. (If you don't agree with the Green Belt Review Methodology you can comment in the separate evidence consultation)	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6
					The designation of Local Green Space must be consistent with planning for sustainable development and should not undermine the aim of plan making. Local Green Space will rarely be appropriate where the land has planning permission for development, which this site does – as can be seen from the scout hut and the previously developed land that is formed by a concrete element to the site for a previously installed swimming pool. The site is furthermore, on private land and not accessible to the wider public and should not therefore be considered as contributing toward amenity space for the area, to which there is an abundance. Designation as urban open space is not therefore appropriate and given the present situation with regard to the former concrete swimming pool; the post development benefits of the site from an aesthetic green value is to be enhanced when compared to the presently proposed allocation. The minimum standard for the supply of accessible public open space which is currently set at 2.4 hectares for every thousand people does not take into consideration the soundness of the Local Plan moving forward and the development needs of the borough. The network analysis based on the principle that no part of the Primarily Residential Area should be further than comfortable walking distance away from an open space would not be impacted by the allocation of new development land in this location to meet the borough's development needs.						
1246581	LPIO-7600	no			No overall contribution						
1243342	LPIO-767	yes									
1246592	LPIO-7692	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land MUST be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA. I particularly object to any definition of the Greenhouse farm site in Greasby as less than high. This is a working farm and must be protected from development. We must preserve agricultural land and reduce our reliance in imported food particularly now given what is happening with coronavirus. I do not know the site reference for Greenhouse farm but please apply these comments to that site.						
1246431	LPIO-7730	no	5.13, 7.25, 7.27	High	Frankby, site 5.13 is a small village with an incredibly rural character. The wildlife in Frankby, its Conservation Area Management Plan, the fact that all the green spaces around it are well used. Definitely not weakly performing. Sites 7.25, and 7.27 have so many special characteristics, contribute greatly to the landscape and whole identity of the area and should be considered high greenbelt value. I know that there have been very detailed submissions about all of these and associate myself with them.						
1246594	LPIO-7762	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land MUST be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA. THERE SHOULD BE NO EXCEPTIONS TO THIS.						
1240903	LPIO-7843	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land MUST be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1246596	LPIO-7979	no			The green belt review is flawed and fails to take into account the 'character' and 'productive' nature of the green belt.						
1246605	LPIO-8126	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land MUST be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1246598 Hoylake Vision	LPIO-8147	no			The Ellerman Lines site at Hoylake could unlock development potential for Hoylake in the context of a reconfigured Carr Lane area and potential Wildfowl and Wetlands Centre. This is greenbelt but it is a small and strategically very important site.						
1239029	LPIO-820	no			Any Green Belt parcel on the Wirral is vital as we have so little of it because so much of the Wirral is already developed.						
1240932	LPIO-8230	no	North of Red Hill Road, Storeton (Parcel 4.3, SP036)	Weak	No, Our Client disagrees with the classification of some sites within the 2019 Green Belt Review. A Response to the Methodology and Findings of the Arup Green Belt Review 2019 has been prepared by the Consultant and accompanies these representations. The Green Belt Review 2019 concluded that a number of land parcels performed weakly and the Council has proposed some for potential release under either Option 2A or Option 2B. These include Parcels 7.11, 7.15, 7.16, 7.17 and 7.18 that Our Client control either as a whole or in part. Our Client supports the classification of these sites and the Council's decision to potentially allocate them for development as part of their Options. Our Client also supports Arup's classification of Parcels 4.11 and 4.12 as performing weakly. The consultants assessment reapplies the Arup Green Belt Review 2019 Methodology. The lower performing parcels identified by the the Consultant's assessment are those which make a weak contribution to the purposes of the Green Belt and are considered to have the greatest potential for release, subject to other evidence in the site selection process. Barnes Walker's assessment concludes that a number of parcels which the Green Belt Review 2019 considered to make a moderate contribution actually make a weak contribution to the purposes of the Green Belt. These parcels include Our Client's land detailed at paragraph 3.58 of our representations. Therefore, Our Client recommends that these parcels should therefore be included within the Council's site selection process. Further information on these sites can be found in the Vision Document that accompanies these representations. Please refer to paragraphs 3.52 to 3.59 of our full representations for our more detailed response to this question and also to Section 2 where we outline how exceptional circumstances exist to justify the release of Green Belt land for development in the Local Plan.	<a href="https://wirral-consult.objective.co.uk/file/5683689">https://wirral-consult.objective.co.uk/file/5683689</a>	<a href="https://wirral-consult.objective.co.uk/file/5682697">https://wirral-consult.objective.co.uk/file/5682697</a>	<a href="https://wirral-consult.objective.co.uk/file/5682701">https://wirral-consult.objective.co.uk/file/5682701</a>			

Person ID	ID	Question 2.16 - Do you agree with the classification of sites set out within the 2019 Green Belt Review?	Site number / Reference:	Question 2.16b - Suggested alternative classification (please select):	Question 2.16c - Please give your reasons below. (If you don't agree with the Green Belt Review Methodology you can comment in the separate evidence consultation)	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6
1240932	LPIO-8235	no	West of Brimstage Lane, Storeton (SP037)	Weak	No, Our Client disagrees with the classification of some sites within the 2019 Green Belt Review. A Response to the Methodology and Findings of the Arup Green Belt Review 2019 has been prepared by the Consultant and accompanies these representations. The Green Belt Review 2019 concluded that a number of land parcels performed weakly and the Council has proposed some for potential release under either Option 2A or Option 2B. These include Parcels 7.11, 7.15, 7.16, 7.17 and 7.18 that Our Client control either as a whole or in part. Our Client supports the classification of these sites and the Council's decision to potentially allocate them for development as part of their Options. Our Client also supports Arup's classification of Parcels 4.11 and 4.12 as performing weakly. The consultants assessment reapplies the Arup Green Belt Review 2019 Methodology. The lower performing parcels identified by the the Consultant's assessment are those which make a weak contribution to the purposes of the Green Belt and are considered to have the greatest potential for release, subject to other evidence in the site selection process. Barnes Walker's assessment concludes that a number of parcels which the Green Belt Review 2019 considered to make a moderate contribution actually make a weak contribution to the purposes of the Green Belt. These parcels include Our Client's land detailed at paragraph 3.58 of our representations. Therefore, Our Client recommends that these parcels should therefore be included within the Council's site selection process. Further information on these sites can be found in the Vision Document that accompanies these representations. Please refer to paragraphs 3.52 to 3.59 of our full representations for our more detailed response to this question and also to Section 2 where we outline how exceptional circumstances exist to justify the release of Green Belt land for development in the Local Plan.	<a href="https://wirral-consult.objective.co.uk/file/5683689">https://wirral-consult.objective.co.uk/file/5683689</a>	<a href="https://wirral-consult.objective.co.uk/file/5682697">https://wirral-consult.objective.co.uk/file/5682697</a>	<a href="https://wirral-consult.objective.co.uk/file/5682701">https://wirral-consult.objective.co.uk/file/5682701</a>			
1240932	LPIO-8238	no	East of Brimstage Lane, Storeton (SP041)	Weak	No, Our Client disagrees with the classification of some sites within the 2019 Green Belt Review. A Response to the Methodology and Findings of the Arup Green Belt Review 2019 has been prepared by the Consultant and accompanies these representations. The Green Belt Review 2019 concluded that a number of land parcels performed weakly and the Council has proposed some for potential release under either Option 2A or Option 2B. These include Parcels 7.11, 7.15, 7.16, 7.17 and 7.18 that Our Client control either as a whole or in part. Our Client supports the classification of these sites and the Council's decision to potentially allocate them for development as part of their Options. Our Client also supports Arup's classification of Parcels 4.11 and 4.12 as performing weakly. The consultants assessment reapplies the Arup Green Belt Review 2019 Methodology. The lower performing parcels identified by the the Consultant's assessment are those which make a weak contribution to the purposes of the Green Belt and are considered to have the greatest potential for release, subject to other evidence in the site selection process. Barnes Walker's assessment concludes that a number of parcels which the Green Belt Review 2019 considered to make a moderate contribution actually make a weak contribution to the purposes of the Green Belt. These parcels include Our Client's land detailed at paragraph 3.58 of our representations. Therefore, Our Client recommends that these parcels should therefore be included within the Council's site selection process. Further information on these sites can be found in the Vision Document that accompanies these representations. Please refer to paragraphs 3.52 to 3.59 of our full representations for our more detailed response to this question and also to Section 2 where we outline how exceptional circumstances exist to justify the release of Green Belt land for development in the Local Plan.	<a href="https://wirral-consult.objective.co.uk/file/5683689">https://wirral-consult.objective.co.uk/file/5683689</a>	<a href="https://wirral-consult.objective.co.uk/file/5682697">https://wirral-consult.objective.co.uk/file/5682697</a>	<a href="https://wirral-consult.objective.co.uk/file/5682701">https://wirral-consult.objective.co.uk/file/5682701</a>			
1240932	LPIO-8239	no	East of Glenwood Drive, Irby (Parcel 7.22, SP019B)	Weak	No, Our Client disagrees with the classification of some sites within the 2019 Green Belt Review. A Response to the Methodology and Findings of the Arup Green Belt Review 2019 has been prepared by the Consultant and accompanies these representations. The Green Belt Review 2019 concluded that a number of land parcels performed weakly and the Council has proposed some for potential release under either Option 2A or Option 2B. These include Parcels 7.11, 7.15, 7.16, 7.17 and 7.18 that Our Client control either as a whole or in part. Our Client supports the classification of these sites and the Council's decision to potentially allocate them for development as part of their Options. Our Client also supports Arup's classification of Parcels 4.11 and 4.12 as performing weakly. The consultants assessment reapplies the Arup Green Belt Review 2019 Methodology. The lower performing parcels identified by the the Consultant's assessment are those which make a weak contribution to the purposes of the Green Belt and are considered to have the greatest potential for release, subject to other evidence in the site selection process. Barnes Walker's assessment concludes that a number of parcels which the Green Belt Review 2019 considered to make a moderate contribution actually make a weak contribution to the purposes of the Green Belt. These parcels include Our Client's land detailed at paragraph 3.58 of our representations. Therefore, Our Client recommends that these parcels should therefore be included within the Council's site selection process. Further information on these sites can be found in the Vision Document that accompanies these representations. Please refer to paragraphs 3.52 to 3.59 of our full representations for our more detailed response to this question and also to Section 2 where we outline how exceptional circumstances exist to justify the release of Green Belt land for development in the Local Plan.	<a href="https://wirral-consult.objective.co.uk/file/5683689">https://wirral-consult.objective.co.uk/file/5683689</a>	<a href="https://wirral-consult.objective.co.uk/file/5682697">https://wirral-consult.objective.co.uk/file/5682697</a>	<a href="https://wirral-consult.objective.co.uk/file/5682701">https://wirral-consult.objective.co.uk/file/5682701</a>			
1240932	LPIO-8247	no	East of Rigby Drive, Greasby (Part of Parcel 5.14, SP010A, SHLAA site 0879)	Weak	No, Our Client disagrees with the classification of some sites within the 2019 Green Belt Review. A Response to the Methodology and Findings of the Arup Green Belt Review 2019 has been prepared by the Consultant and accompanies these representations. The Green Belt Review 2019 concluded that a number of land parcels performed weakly and the Council has proposed some for potential release under either Option 2A or Option 2B. These include Parcels 7.11, 7.15, 7.16, 7.17 and 7.18 that Our Client control either as a whole or in part. Our Client supports the classification of these sites and the Council's decision to potentially allocate them for development as part of their Options. Our Client also supports Arup's classification of Parcels 4.11 and 4.12 as performing weakly. The consultants assessment reapplies the Arup Green Belt Review 2019 Methodology. The lower performing parcels identified by the the Consultant's assessment are those which make a weak contribution to the purposes of the Green Belt and are considered to have the greatest potential for release, subject to other evidence in the site selection process. Barnes Walker's assessment concludes that a number of parcels which the Green Belt Review 2019 considered to make a moderate contribution actually make a weak contribution to the purposes of the Green Belt. These parcels include Our Client's land detailed at paragraph 3.58 of our representations. Therefore, Our Client recommends that these parcels should therefore be included within the Council's site selection process. Further information on these sites can be found in the Vision Document that accompanies these representations. Please refer to paragraphs 3.52 to 3.59 of our full representations for our more detailed response to this question and also to Section 2 where we outline how exceptional circumstances exist to justify the release of Green Belt land for development in the Local Plan.	<a href="https://wirral-consult.objective.co.uk/file/5683689">https://wirral-consult.objective.co.uk/file/5683689</a>	<a href="https://wirral-consult.objective.co.uk/file/5682697">https://wirral-consult.objective.co.uk/file/5682697</a>	<a href="https://wirral-consult.objective.co.uk/file/5682701">https://wirral-consult.objective.co.uk/file/5682701</a>			



Person ID	ID	Question 2.16c - Do you agree with the classification of sites set out within the 2019 Green Belt Review?	Site number Reference:	Question 2.16b - Suggested alternative classification (please select):	Question 2.16c - Please give your reasons below. (If you don't agree with the Green Belt Review Methodology you can comment in the separate evidence consultation)	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6	
1240932	LPIO-8252	no	South of Thornton Hough (Green Belt parcel 65 within washed over village)	Weak	No, Our Client disagrees with the classification of some sites within the 2019 Green Belt Review. A Response to the Methodology and Findings of the Arup Green Belt Review 2019 has been prepared by the Consultant and accompanies these representations. The Green Belt Review 2019 concluded that a number of land parcels performed weakly and the Council has proposed some for potential release under either Option 2A or Option 2B. These include Parcels 7.11, 7.15, 7.16, 7.17 and 7.18 that Our Client control either as a whole or in part. Our Client supports the classification of these sites and the Council's decision to potentially allocate them for development as part of their Options. Our Client also supports Arup's classification of Parcels 4.11 and 4.12 as performing weakly. The consultants assessment reapplies the Arup Green Belt Review 2019 Methodology. The lower performing parcels identified by the the Consultant's assessment are those which make a weak contribution to the purposes of the Green Belt and are considered to have the greatest potential for release, subject to other evidence in the site selection process. Barnes Walker's assessment concludes that a number of parcels which the Green Belt Review 2019 considered to make a moderate contribution actually make a weak contribution to the purposes of the Green Belt. These parcels include Our Client's land detailed at paragraph 3.58 of our representations. Therefore, Our Client recommends that these parcels should therefore be included within the Council's site selection process. Further information on these sites can be found in the Vision Document that accompanies these representations. Please refer to paragraphs 3.52 to 3.59 of our full representations for our more detailed response to this question and also to Section 2 where we outline how exceptional circumstances exist to justify the release of Green Belt land for development in the Local Plan.	<a href="https://wirral-consult.objective.co.uk/file/5683689">https://wirral-consult.objective.co.uk/file/5683689</a>	<a href="https://wirral-consult.objective.co.uk/file/5682697">https://wirral-consult.objective.co.uk/file/5682697</a>	<a href="https://wirral-consult.objective.co.uk/file/5682701">https://wirral-consult.objective.co.uk/file/5682701</a>				
1246612	LPIO-8278	no	6.15	High	My comments relate to 6.15 but are more general It is current agricultural land (growing maize), bordering a protected wood, nestled between 2 areas of national trust land (important wildlife corridor) at the edge of a conservation area. How can this be of low value? How can any greenbelt be of low value? I would suggest that the only reason you are even considering this is the fact the person who owns it would like to develop it (to make himself a lot of money). It is not a plan, based upon the worth of the land, it is just convenient!!!							
1237882	LPIO-8305 1 of 2	no	Green Belt Parcel 6.15	High	<ul style="list-style-type: none"> <li>I do not agree with the classification of weakly performing parcels or settlements. Agricultural land MUST be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.</li> <li>I object strongly to the proposed release of Green Belt Parcel 6.15 under Option 2A. This parcel makes a STRONG contribution towards the 5 key purposes of the Green Belt: Purpose 1 - I have significant concerns regarding the Green Belt Review methodology. It is not clear how and why the Birkenhead area alone is considered to fall within this definition.</li> <li>Further clarification is needed. In relation to Parcel 6.15, I note that West Kirby forms part of a long stretch of urban form which constitutes a large urban area. Parcel 6.15 should therefore be considered to be making a strong contribution to checking the unrestricted sprawl of urban areas. Strong objection to the release of Green Belt Parcel 6.15. This parcel = STRONG contribution to the 5 key purposes of the Green Belt: Purpose 1 SIGNIFICANT concerns regarding the methodology. Why only the Birkenhead area falls within this definition? Further clarification needed. Parcel 6.15 = strong contribution to checking the unrestricted sprawl of urban areas.</li> </ul>	<a href="https://wirral-consult.objective.co.uk/file/567419">https://wirral-consult.objective.co.uk/file/567419</a>						
1237882	LPIO-8305 2 of 2	no	Green Belt Parcel 6.15	High	Purpose 2 Parcel 6.15 is the only open space that separates West Kirby and Caldly. Therefore makes a strong contribution to preventing neighbouring towns merging. Furthermore, I have SERIOUS concerns with the following assessment of the site: "The...forms a 'finger' of Green Belt within Settlement Area 6...less essential gap between Settlement Area 6 and 7". The NPPF does not differentiate between essential/less essential gaps. Further clarification required on this assessment. I don't agree strongly with the characterisation of Parcel 6.15 as being less essential gap as this is not a distinction made by NPPF. Purpose 3 Relating to Parcel 6.15, I have SIGNIFICANT concerns about the characterisation of the site as "the parcel forms a 'finger' of Green Belt... not well connected to the countryside". The NPPF does not refer to connectivity of 'fingers' to the countryside. Parcel 6.15 = strong contribution to Purpose 3. Further clarification about 'extra' criteria used official processes. Purpose 4 The Parcel is immediately adjacent to Caldly Conservation Area, which in my view has not been properly assessed by the Council. Purpose 5 I have VERY SIGNIFICANT concerns in relation to the assumption that "All Green Belt land...to support urban regeneration..it is not appropriate to state that...perform this to a stronger or weaker degree". ALL sites = strong contribution Overall, there are significant concerns on the methodology used and further clarification is needed. Overall, I consider Parcel 6.15 makes a STRONG contribution towards the key purposes of the Green Belt as set out at Paragraph 134 of the NPPF.							
1244670	LPIO-8431	no			I do not agree with the classification of weakly performing parcels or settlements. Agricultural land MUST be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.							
1237748	LPIO-8496	no			The definition of weakly performing Green Belt is extremely questionable for many reasons. Firstly it is nonsense that the ARUP report classes only 10 Green Belt sites as strongly contributing to the purposes of the Green Belt. ARUP in their analysis attributes a default value of moderate to all Green Belt areas in terms of the purpose of assisting urban regeneration by encouraging the recycling of derelict and other urban land. This undervalues the reason that Green Belt on the Wirral was formed in the first instance. ARUP only consider urban sprawl as involving the east side of Wirral. This is my view is an oversight and areas like Heswall and Pensby should also be included. ARUP follows the Council's use of Settlement Areas thereby starting off with the assumption that for example Heswall, Barnston, Pensby and Irby are all one settlement. They should not be classified as one Settlement. This assumption is further compounded by the extremely narrow interpretation of a 'town' used. Finally, the Review fails to take proper account of 'character' and 'productive' nature of the Green Belt.							
1243448	LPIO-850	no	5.13	High	All of the Greenbelt should be classified as giving a strong contribution as it all prevents encroachment and urban sprawl. For example parcel 5.13 provides a buffer between Greasby and Frankby and the development of this piece of land would bring housing much closer to the nearby SSSI. Also the adjacent parcel (5.12) has been classified as giving a strong contribution, but the development on 5.12 would result in less of an impact on the surrounding green space than the development of 5.13. NONE of the Greenbelt should be developed.							

Person ID	ID	Question 2.16 - Do you agree with the classification of sites set out within the 2019 Green Belt Review?	Site number/ Reference:	Question 2.16b - Suggested alternative classification (please select):	Question 2.16c - Please give your reasons below. (If you don't agree with the Green Belt Review Methodology you can comment in the separate evidence consultation)	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6
1246624	LPIO-8537	no			I thought WMBC had passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA. With the Climate Emergency I expect ALL Agricultural land to be protected. The UK is too dependent upon imports of food. Therefore I do not agree with the classification of weakly performing land.						
1240872	LPIO-8607	no	SP043 Vineyard Farm	Moderate	I have made this clear in the previous round of comments but will do so again here. SP043 is wrongly classed as weakly performing. This is wrong as you are using boundaries and portions of land that cannot be developed. SP043 provides links to Dibbendsdale Nature reserve Brotherton Park and most importantly a corridor to the open countryside. It seems that the way you class it as being highly enclosed uses the trainline which is on the otherside of the nature reserve which is omitted from any development proposal. This changes the physical boundary to one of ancient woodland and land designated for its biodiversity. The road you use (Poulton road) is a small country lane and cannot even be seen from the site. It is clear when standing on the crest of the hill of SP043 that this site is a vital corridor clearly connecting greenbelt site of high biodiverse value to the open countryside down to the River Dee. It is also vital to retain to stop Bromborough merging with Spital. SP043 ensures the unrestricted sprawl of large built-up areas (Spital and Bromborough) Prevents neighbouring towns merging into one another (Spital and Bromborough); Assists in safeguarding the countryside from encroachment; This is vital for Dibbendsdale Nature reserve, the ancient woodland and biodiverse area that this site includes. Preserves the setting and special character of Spital, this is an open quite space enjoyed by many for walking and leisure. There are no playing fields near here so this is our only open greenspace that must remain as it is.						
1246638	LPIO-8678	no	Column Rd Caldly	High	This site makes provides a high contribution to green belt objectives and should be retained as is.						
1246631	LPIO-8680	no									
1246544	LPIO-8740	no									
1246202	LPIO-8753	no	General comment	Weak	There will usually be 'weak' area on the fringes of green belt. Utilising these weak areas for development will just move these weak areas, thus eroding the green belt generally. I do not agree with this; the weak areas should remain to provide a buffer between then green and developed areas.						
1243593	LPIO-8839	no									
1237807	LPIO-8840	no		No overall contribution	The concept of weakly performing green belt site is nothing more than a bureaucratic device to enable areas so called weakly performing areas to be more easily developed. The assessment states:- "It accords with national policy and guidance as well as good practice from elsewhere". Rubbish! Who's to say what is 'good practice' in this case? National Policy is defined in the green belt legislation, nowhere is the concept of 'weakly performing' mentioned. When the Merseyside green belt was being discussed and after much public consultation there was no mention that some of it may become 'weakly performing'. This is a con trick designed to release green belt land either in the future or more alarmingly within this local plan. Eastham Conservation area is particularly vulnerable. The green belt here protects the Conservation Area and should be considered to be part of it for planning purposes.						
1246286	LPIO-8868	no	Parcel 6.15 - West of Column Road, West Kirby	High	I object strongly to the proposed release of Green Belt Parcel 6.15 under Option 2A. Parcel 6.15 makes a strong contribution towards the 5 key purposes of the Green Belt set out within the NPPF: Purpose 1 – I have significant concerns in relation to the Green Belt Review findings in this regard. The site would result in the visual and physical coalescence of two settlements – Caldly and West Kirby. These form a long stretch of urban form which constitutes a large urban area. Parcel 6.15 therefore makes a strong contribution to checking the unrestricted sprawl of urban areas. Purpose 2 - Parcel 6.15 evidently forms the only open space separating Caldly and West Kirby in this location, and therefore makes a strong contribution towards Purpose 2 of the Green Belt. I therefore strongly disagree with the view that the site makes a 'weak contribution'. Purpose 3 - Parcel 6.15 performs an important role in transitioning from the low-density development on the eastern edge of Caldly towards the rural area beyond. The Parcel makes a strong contribution towards safeguarding this area from encroachment. Purpose 4 - I agree that Parcel 6.15 does not make any contribution towards purpose 4. Purpose 5 - I disagree that 'all Green Belt land' equally supports urban regeneration of settlements within Wirral. Parcel 6.15 is a predominantly open, greenfield site, and in my view makes a strong contribution towards encouraging the recycling of derelict and other urban land. In my view, for the reasons set out above, Parcel 6.15 makes a strong contribution towards the key purposes of the Green Belt set out at NPPF Paragraph 134. I consider the Green Belt Review to be seriously flawed in its interpretation of NPPF and therefore strongly call for a review of this piece of work.						
1246651	LPIO-8942	no			I do not agree. Of particular concern is the development of prime agricultural farmland and important natural habitats. Agricultural land must be kept as such. Wirral Borough Council passed a motion to the effect that agricultural land should not be included in any SHLAA.						
1246667	LPIO-9026	yes									
1243888	LPIO-911	no	site no. 8, SHLAA 1778 Sandy Lane	High	8 is a real surprise to residents as it is also a Site of Special Landscape Value according to the Unitary Development Plan, has an orchard, a very large mature oak with a TPO and it is adjacent to a site of national importance. It helps give Irby its distinctive character and creates a clear historic border with Thurstonston and indeed, runs alongside the ward boundary.						
1246678	LPIO-9285	no		High	All Green Belt is classed as Green Belt as it serves a purpose: To protect from Urban Sprawl and to prevent the merger of villages within Wirral. To classify different areas is beyond comprehension.						
1245289	LPIO-9455	no									
1246699	LPIO-9532	no			I am concerned that plots of land either side of lever causeway may have been misclassified. Please can you check them						
1246712	LPIO-9580	no			We have no objection to the classification but concerns on the size of the parcels and specific sites have not been assessed individually. Please see our attached statement for our full case.						

Person ID	ID	Question 2.16 - Do you agree with the classification of sites set out within the 2019 Green Belt Review?	Site number / Reference:	Question 2.16b - Suggested alternative classification (please select):	Question 2.16c - Please give your reasons below. (If you don't agree with the Green Belt Review Methodology you can comment in the separate evidence consultation)	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6
1246693	LPIO-9605	no			I do not agree with the classification of weakly performing parcels or settlements. I believe that all agricultural land should be supported to maximise its agricultural potential. Agricultural land MUST be kept as agricultural land. The current WORLD CRISIS of Covid 19 will result in WORLD food shortages. Britain has left the EU our biggest trading partner and food will become more expensive. Every effort should be made to produce food locally and to do this we need agricultural land. I was present at the meeting in October 2019 during which Wirral Borough Council Members passed a motion to the effect that Agricultural land should not be included in any SHLAA.						
1246717	LPIO-9635	no			The Supporting Statement submitted for Question 2.16 provides Nexus Planning's assessment of the classification of the Site (land to the West of Mount Road) as set out in the 2019 Green Belt Review. Green Belt parcels are identified in Appendix H of the Green Belt Assessment Review. The Arup Green Belt Assessment considered the Site as part of the much larger 'Parcel 4.2'. In our view, the site does not reflect the characteristics of the considerably larger Green Belt parcel 4.2, which covers a much larger area of land running from Lever Causeway to the north and Rest Hill Road to the south. It is our Client's view that given the contained nature of the Site, the Council should assess the Site as a discrete parcel. The suitability of the site's release from the Green Belt is demonstrated within the Supporting Document submitted for Question 2.16, which provides an independent assessment of the site's contribution to the five purposes of including land within the Green Belt. In summary, the parcel makes no contribution to one purpose, a weak contribution to three purposes and a moderate contribution to one purpose. It makes a weak contribution to checking the sprawl of large built up areas by preventing future ribbon development and preventing further sprawl within the parcel. The site makes a weak contribution to safeguarding from encroachment because it has a moderate degree of openness and durable boundaries which could contain future encroachment. It makes a weak contribution to preventing towns from merging and does not contribute to preserving the character of a historic town. The Supporting Statement confirms that the Site makes an overall weak contribution to the purposes of the Green Belt, and is therefore suitable for release from the Green Belt.	<a href="https://wirral-consult.objective.co.uk/file/56811">https://wirral-consult.objective.co.uk/file/56811</a>					
1246691	LPIO-9712	no	sp062 - west of barnston	High	Using Greenbelt 5 purposes: P1 check unrestricted sprawl of large builtup areas Each of SP062's SHLAA sites have low % of land adjacent to urban areas and are individually: 'Poorly enclosed' SHLAA884/SHLAA1956.; 'Not Enclosed' SHLAA1881 or 'Rural' SHLAA1955. The council define SP062 as checking unrestricted sprawl - 'Greenbelt Parcels Initial Background Data'. P2: prevent neighbouring towns merging SP062 prevents merging of the very distinct towns/villages of Pensby/Heswall/Barnston. The development of SP062 will have the highest level of impact. The council states: 'would remove physical separation between Pensby/Heswall and rural village of Barnston, which could affect the character, appearance and distinctiveness of Barnston Village Conservation Area'. P3 assist in safeguarding the countryside from encroachment The single land use of SP062 is agricultural and any development would intrude discordantly into the open countryside currently used for the growing of crops and rearing sheep/cattle. 'where significant development of agricultural land is necessary, (councils) should seek to use areas of poorer quality land in preference to that of a higher quality'. P4 preserve the setting and special character of historic towns One reason for the establishment/retention of green belt is the protection of designated conservation areas. SP062 development would permanently alter the character of the designated conservation area of Barnston Village whilst ironically the council has defined the 'landscape strategy' for SP062 and Barnston as 'Enhance'. P5: assist in urban regeneration by encouraging the recycling of derelict land The 'Initial Review of the Green Belt' states 'the proximity to areas of greatest need will also be taken into account as part of the initial assessment'. SP062 encourages development of brownfield areas and is a great distance from the areas of greatest need and development here would have least impact on recycling derelict land.	<a href="https://wirral-consult.objective.co.uk/file/565647">https://wirral-consult.objective.co.uk/file/565647</a>					
1245833	LPIO-9796	no		High	We disagree with the classification of sites set out in the 2019 Green Belt Review in respect of parcel 6.15 (Land west of Column Road), parcel 7.25 (Land west of Sandy Lane), parcel 7.26 (Land at 59, 41, 61 Thurston Road) and parcel 7.27 (land south of Thingwall Road). These sites were assessed as making only a 'weak overall contribution to the Green Belt'. It is our view that they make a significant contribution for the reasons set out in our response to question 4.12. The cumulative impact of removing large swathes of land from the Green Belt also needs to be addressed.						
1238147	LPIO-9843	no		High	The ARUP assessment does not give enough weight to a primary role of the Green Belt to keep individual towns and villages separate and to promote urban regeneration by preventing urban sprawl. Weakly performing Green Belt is a fabricated classification devised by a consultancy which has a declared interest in developing Green Belt land, and has no meaning in the NPPF.						
1246724	LPIO-9885	no		No overall contribution	I do not agree with the classification of weakly performing parcels or settlements. Agricultural land MUST be kept as such. Wirral Borough Council passed a motion in October 2019 to the effect that Agricultural land should not be included in any SHLAA.						
1241337	LPIO-9920	no			I do not agree with the classification of weakly performing areas of Green Belt. All green belt land was formed for still very valid reasons which have not altered. The ARUP review fails to take proper account of the character and productive nature of the Green Belt, which in future will only become more important as sustainable, climate-controlling, pollution-reducing and local food-producing farmland. Little regard is also taken of the role Green Belt is playing now and will in the future, in making a massive contribution to the quality of life, health, the tourist industry, outdoor leisure and sports activities and the local economy, as well as protecting wildlife and their habitats. Allowing housing in the Green Belt would also divert resources from much needed regeneration elsewhere.						

Person ID	ID	Question 2.16 - Do you agree with the classification of sites set out within the 2019 Green Belt Review?	Site number / Reference:	Question 2.16b - Suggested alternative classification (please select):	Question 2.16c - Please give your reasons below. (If you don't agree with the Green Belt Review Methodology you can comment in the separate evidence consultation)	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6
1245994	LPIO-9939	no			I do not accept the premise that some Green Belt land and settlements are "Weakly Performing". They are more important now than ever before in addressing the five purposes that they were set up for. The whole classification process is subjective and unreliable. It's funny how the sites that are classed as making the least contribution also happen to be the prime development sites with developers and landowners keen to put them forward for housing. I disagree strongly with the classification of the Green Belt sites that I am familiar with near where I live and will comment on them separately. The only "exceptional" circumstances that I can see associated with the potential release of Green Belt is the vastly exaggerated and unjustifiable figure of 12,000 homes that the Council claims are needed. If this figure is reduced to something more realistic then there will be no need to build any of the 2,500 homes that the Council claims may be required on Green Belt. It also contravenes a motion passed by the Council in October 2019 that agricultural land should not be included in any SHLAA and must be kept as agricultural land. The Council bangs on about protecting our environment and heritage. More recently, guarding against climate change has emerged as another key headline amongst the Council's key objectives. Trees and plants absorb carbon dioxide; houses don't. We can't afford to sacrifice Green Belt just to allow developers and land owners to get rich.						
1241495	LPIO-9965	no			I do not agree with the classification of Green Belt land into weakly and strongly performing parcels. Insufficient account has been taken of wildlife habitat in particular Local Wildlife Sites. The Green Belt Review Appendix G Parcel Assessment Table includes national and international sites even TPO sites but does not include Local Wildlife Sites. Why? The Green Belt is extremely important for wildlife. In fact the majority of Local Wildlife Sites lie within the Green Belt and contribute to its value. These sites have been overlooked in the Green Belt Parcel assessment and should have been given due consideration. However no account has been taken of these wildlife habitats and consequently inappropriate Green Belt sites have been selected for possible release. I object to these Local Wildlife Sites being disregarded. The Sustainability Appraisal (5.3.1) recognises that Wirral is "Wirral is unique in comparison to other localities as it has significant biodiversity designations in both coastal and non-coastal environments". I would agree but it would appear that they have not all been considered. The Sustainability Appraisal recognises that "each of the spatial options is likely to generate negative effects with regard to biodiversity" (5.3.3). I would agree with this statement. Yet the Appraisal continues (5.3.10) "However, the majority of identified parcels that could be involved do not overlap significantly with designated or biodiversity action plan habitats." I disagree as some of the sites (6.15, 7.17, 7.25, & 7.27) certainly overlap and I have major concerns for them. There are implications for wildlife on several of the other sites too. In the review of "weakly performing Green Belt" parcels of land, and not currently proposed for development, I have major concerns for several sites and there are implications for wildlife on many others too. I remain opposed to any development on any wildlife areas which are included in the sites under review. I particularly oppose development on sites where there is a risk to the local badger population. I do not believe that there are exceptional circumstances for developing in the Green Belt. Green Belt land should not be released until it is absolutely necessary. It should "only" be considered for release "when" there are no more brown field and urban sites available.	<a href="https://wirral-consult.objective.co.uk/file/5662">https://wirral-consult.objective.co.uk/file/5662</a>					