



WIRRAL LOCAL PLAN

**STATEMENT OF RESPONSE
DEVELOPMENT OPTIONS REVIEW CONSULTATION
SEPTEMBER – OCTOBER 2018**

DECEMBER 2019

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1. Introduction

- 1.1 This report provides a summary of issues raised during the Council's Development Options Review consultation held between 3 September 2018 and 26 October 2018. It sets out Wirral Council's response to those issues, and details of how the issues raised have helped to inform the emerging Local Plan.
- 1.2 This Statement of Response should be read in conjunction with the Council's Report of Consultation on the Development Options Review¹, which was published in February 2019. That document provides an overview of the timescales and methods of consultation, including the means of publicity and details of briefing and drop-in events that were held. It also includes details of number of responses received (and who those responses were from), details of the individuals and organisations that were initially notified of the consultation, and the summarised text of consultation responses.
- 1.3 This Statement of Response sets out in turn:
- Analysis of the issues raised in comments;
 - Details of which settlements and sites were identified in comments;
 - The Council's process of responding to comments.
- 1.4 The summary of issues and Council responses themselves are set out over two appendices to this report:
- Appendix 1 – Responses to non-site-specific issues
 - Appendix 2 – Responses to site-specific issues

2. Analysis of issues raised in comments

- 2.1 A total of 3,221 responses were received during the Development Options Review consultation. The existing Report of Consultation sets out a detailed breakdown of the types of respondents; but broadly speaking 96% were from local residents, 2% were from development interests such as landowners and developers, and 2% were from community groups and other public authorities. These proportions dictate the nature of the issues which were raised most prominently.
- 2.2 There were a wide variety of issues raised during the consultation – the Council has identified just under 100 non-site-specific issues throughout Appendix 1, and around 250 site-specific issues throughout Appendix 2. There is however a tendency for a relatively small number of these issues to be raised time and time again – most issues were only identified by a handful of respondents, with the majority of comments tending to focus on the same one or two issues around the principle of Green Belt release. However, it is important to note that the quantity of comments does not necessarily influence the way in which the Council has responded to them – there will still be very pertinent issues amongst those which were raised least frequently (See Section 4 below).

¹ <https://www.wirral.gov.uk/sites/default/files/all/planning%20and%20building/Local%20plans%20and%20planning%20policy/Local%20plans/Core%20strategy%20local%20plan/Development%20Options%20Review/Report%20of%20Consultation/Report%20of%20Consultation%20on%20Development%20Options%20-%20-%20New.pdf>

- 2.3 In terms of non-site-specific comments, the most prominently identified themes were:
1. Objection in principle to the release of land from the Green Belt **(1,906 comments)**
 2. Brownfield or derelict land on the Wirral should be developed first **(1,314)**
 3. Housing growth projections are over-estimated; the housing target is too high **(458)**
 4. More effort should be put into delivering Wirral Waters, rather than other sites **(319)**
 5. There are large numbers of empty homes not being utilised **(231)**
 6. The health and wellbeing of residents is not being adequately considered **(161)**
 7. Agricultural land should be protected from development **(151)**
 8. There is a lack of affordable housing provision in the proposals **(130)**
 9. There are fundamental constraints in Wirral's transport network **(110)**
 10. Housing developers are only concerned about profit **(96)**
- 2.4 All of the top ten most prominently identified themes are objections to potential development approaches. By far the most common theme was objection to the principle of developing any of Wirral's Green Belt land – and suggestions to develop brownfield or derelict land instead, a closely related theme, came second. Many of these comments were not explicitly anti-development – rather, it was the type and location of development which was a concern. However, a number of comments were clear in their view that no new development should be undertaken in Wirral at all. It is important to note that there were also 33 comments in support of development on Green Belt land.
- 2.5 In terms of site-specific comments, the most prominently identified themes (across all sites and settlements as a whole) were:
1. Traffic congestion in the vicinity of the site will be worsened **(430 comments)**
 2. Development will have an adverse impact on wildlife and biodiversity **(231)**
 3. Development will adversely affect the character of the area surrounding the site **(205)**
 4. Development will adversely affect the natural beauty of the site **(182)**
 5. Green Belt beneficial uses on the site (such as recreation) will be lost **(146)**
 6. There is insufficient healthcare provision in the vicinity to support development **(128)**
 7. There are insufficient community services in the vicinity to support development **(127)**
 8. Air pollution in the vicinity of the site will be worsened **(101)**
 9. There is insufficient utility capacity in the vicinity to support development **(91)**
 10. There is insufficient public transport provision in the vicinity **(72)**
- 2.6 It is evident that the most prominent site-specific themes arose much less than the most prominent non-site-specific themes under paragraph 2.3. This is considered to reflect the diversity of issues relevant to different potential sites – issues most pressing in certain locations will be less relevant in others (although it is clear that concerns around traffic congestion are prevalent for nearly every potential development site around the Borough). The lower prominence of site-specific themes is also the result of not all comments addressing site-specific issues (for example, many simply expressed an objection to the principle of Green Belt development at a Borough-wide level).
- 2.7 Section 3 below sets out further detail on the settlements and sites to which these site-specific comments related.

3. Settlements and sites raised in comments

- 3.1 In common with the range of issues raised in the consultation (as summarised in Section 2), a wide variety of potential sites were raised in comments – but ultimately, only a relatively small number of sites were raised time and time again. This meant that many of the sites in the consultation were only commented on by a handful of respondents, with a large number not being the subject of any comments at all.
- 3.2 Whilst many of the location-specific comments concerned individual potential development sites, others concerned the prospect of development across an entire settlement area. The comments in Appendix 2 to this Statement of Response are therefore structured on this basis. Some comments also concerned specific sites which were not a part of the consultation – these have been grouped in with the settlement-wide comments in Appendix 2.
- 3.3 The total number of comments per settlement is as follows²:
- Storeton **(236 comments)**
 - Bromborough **(204)**
 - Irby **(193)**
 - Heswall **(190)**
 - Pensby **(167)**
 - Eastham **(147)**
 - Barnston **(128)**
 - Birkenhead **(128)**
 - Greasby **(120)**
 - Bebington **(114)**
 - Thingwall **(92)**
 - Spital **(88)**
 - Hoylake **(80)**
 - Saughall Massie **(54)**
 - Wallasey **(49)**
 - New Ferry **(44)**
 - West Kirby **(44)**
 - Caldy **(39)**
 - Thornton Hough **(31)**
 - Raby Mere **(25)**
 - Gayton **(24)**
 - Rock Ferry **(24)**
 - Moreton **(16)**
 - Prenton **(15)**
 - Seacombe **(12)**
 - Upton **(12)**
 - Tranmere **(11)**

² Numbers of comments per settlement are not necessarily the sum of the number of comments for each site set out in Appendix 2 – some comments referred to multiple sites

- Bidston (10)
- Frankby (9)
- Egremont (7)
- Liscard (6)
- Meols (6)
- Clatterbridge (4)
- Leasowe (3)
- New Brighton (3)

- 3.4 There is a clear dominance in the numbers of comments received towards the east and south of Wirral, where much of the Borough's Green Belt is located. It is however notable that these are also the more affluent parts of Wirral – there were far fewer comments regarding sites in more deprived areas of the Borough. Even where comments were made on more deprived areas (such as Birkenhead), these were typically being made by people living in more affluent areas of Wirral – for example, about those areas' need for regeneration and hence need to be favoured for development, instead of the areas currently being considered. The only area where the majority of comments about the need for regeneration came from residents actually stating that they lived in that area was New Ferry.
- 3.5 The only settlements and areas about which no comments were received were Woodchurch and Noctorum. There were a much larger number of sites on which no comments were received – primarily small urban sites and employment sites around Birkenhead and other parts of the main urban conurbation. Apart from site SP025B (West of Weybourne Close, Upton), every Green Belt site contained in the Development Options Review consultation received at least one comment.

4. Process of responding to comments

- 4.1 The following Appendix 1 and Appendix 2 set out the Council's response to each of the key issues raised during the Development Options Review consultation. In most cases, the response sets out how and whether the issue raised has been addressed in the emerging Regulation 18 Draft Local Plan – or if the issue is not directly relevant to the Local Plan, how else the Council will deal with the issue raised.
- 4.2 It is important to note that the emerging Draft Local Plan is very different in nature to the Development Options Review consultation. It contains proposals on a much wider set of issues for the first time, and is based upon significantly greater levels of evidence and understanding around the strategic issues facing Wirral. Whilst this allows the Council to move on conclusively with its plan-making, it also means that some issues will only be tested for the first time through the forthcoming round of consultation. The responses set out in Appendix 1 and Appendix 2 are therefore not the Council's final position on each issue raised – they are based upon the situation at the current point in time.
- 4.3 As highlighted in Sections 2 and 3, there were wide variations in the numbers of comments received on different issues and sites through the Development Options Review consultation. However, the quantity of comments received does not necessarily

influence the way in which the Council has responded to them – the consultation has not been treated as a referendum. There will still be very pertinent issues amongst those issues which were raised least frequently, and each issue raised throughout the consultation has therefore been considered to have equal weight.

- 4.4 The Council is aware that, for some issues, its responses will not have been able to satisfy those who raised them. Whilst public consultation is an extremely important part of the plan-making process, we also need to ensure that we have regard to the requirements of national policy and guidance. This is a delicate balancing act – we need to ensure that we produce a Local Plan which will meet the requirements placed on us by national policy and ultimately be capable of being adopted. Nevertheless, we have sought to give as much weight as possible to the issues raised in comments.
- 4.5 It is also important to note the inherent conflicts between some of the positions put forward during the consultation. For example, the Council cannot entirely satisfy those who are in favour of development in the Green Belt and those who are against it; and cannot satisfy both those who feel that development should be weighted towards the eastern side of Wirral and those who feel that it should be weighted towards the west. Preparing a Local Plan is a challenging balancing act between competing positions – however, whilst our responses will not satisfy every respondent to the consultation, we have sought to ensure that we satisfy as many as possible (whilst also responding to the requirements of national policy).