



ITPAS

SPECIAL NEWSLETTER

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Is our GREEN BELT at risk?

The short answer is **YES** and local residents are rightly concerned but there's plenty of misunderstanding and misinformation circulating about what's going on and what **ITPAS** and others are doing about it.

This **Special Edition** is intended to help inform and encourage support. A comprehensive Article follows a brief **SUMMARY**.



- Wirral Borough Council is belatedly updating its statutory **Local Plan**.
- It states, "The Core Strategy Local Plan will update the Council's long term vision, objectives and spatial strategy for the Borough".
- Without a Local Plan indicating a 5-Year supply of Housing Sites, developers argue **THEY** should be allowed to decide where to build.
- A Local Plan requires Appraisal of what sites are or could be available whether already Approved, Approvable, Previously Developed, Brownfield and even Green Belt were that to be proved necessary.
- Council stresses appraising Sites doesn't mean it will conclude that **ANY** of those Sites should be earmarked for Housing in the Local Plan.
- There have been **no** Planning Applications **nor** any Approvals, even in principle, regarding **ANY** of the Green Belt Sites appraised.
- **ALL** appraised Green Belt Sites in the ITPAS area are '**Category 3**', defined as: "*considered not currently developable, subject to constraints which may only make them deliverable within an 11-15 year period*".
- ITPAS says that whilst this is encouraging, we must not be complacent.
- ITPAS has worked hard for months, submitting detailed Responses to a series of Council Consultations on Local Plan preparations.
- ITPAS and others (Wirral Society and CPRE) have argued that the case for release of ANY Green Belt for Housing is not proven; and indicated how parts of the methodology, assumptions and conclusions of the Council and its Consultants are flawed - the following Article has fuller information on this Exercise and of ITPAS's work and call for support.

Is our GREEN BELT at risk?

The short answer is **YES**. Local residents are right to be concerned but there is a lot of confusion and even misinformation circulating about what is going on and what ITPAS and others are doing about it. For our part, ITPAS continues to work hard and we hope that this article helps to inform, prepare and encourage support.

We on Wirral are blessed with wonderful surroundings, spectacular views and open farmland, with distinct communities separated by tracts of countryside, an enviable mix of rural and urban settings. Green Belt was established precisely to give a high degree of permanence and protection from inappropriate development. By and large, we have enjoyed stability of our Green Belt for many years. However, there is no room for complacency. ITPAS and others continue to remain vigilant and active, both individually and acting together.

Alongside our regular work of appraising and reacting to ALL Planning Applications within our own and neighbouring areas (more of that later), we have been heavily involved for many months in the ongoing Consultation processes of Wirral Borough Council (WBC) and the overarching Liverpool City Region (LCR with its 'SHELMA' exercise involving 5 Local Authorities: Knowsley, Liverpool, Sefton, West Lancs and Wirral) as they work towards updating their statutory 'Core Strategy Local Plans'.

WBC state, "The Core Strategy Local Plan will update the Council's long term vision, objectives and spatial strategy for the Borough." Such 'Local Plans' set things down in detail for the first five years and in terms of direction for the following two periods of five years (longer with some aspects) where different categories of use, such as commerce, retail, housing, leisure, open space, travel infrastructure, etc., could be located in a properly co-ordinated, sustainable and planned way and to the extent necessary to meet proven levels of demand, with some inbuilt flexibility and special measures to control exceptions.

One problem is that many councils, including WBC, have failed over many years to fulfil their statutory duty to update their Local Plans and Registers. Whilst we on Wirral have been fortunate (unlike some other authority areas) in that there have been few instances where this lack of an up-to-date Local Plan has led to inappropriate development but the potential threat is certainly there, with developers (and their legal and planning teams) able to argue, in the absence of, for instance, an identified 5-year supply of housing land, that *they* should be allowed to decide where *they* can build what *they* want.

This real risk of unplanned and ad hoc development needs to be addressed not least because there is a consensus that (i) there are too few dwellings nationally to meet the present and growing 'Housing Need'; (ii) housing is beyond the reach of many people with aspirations of home ownership or rental; and (iii) the shortfall is considerable. The problem is that there are insufficient 'sound' (fully justified) Local Plans in place to determine the reasonable way forward and the extent to which what needs to be delivered is being done or could be achieved. A present danger on Wirral is that, in the rush to complete a 'Local Plan' which is years overdue, the task may not be completed satisfactorily or in a manner acceptable to the populace, who should be the 'masters' and not simply observers of the process. The signs are certainly not all good.

Portraying this exercise as "top-down imposition" is either missing the point or just misleading. The intention of Governments and councils alike is that local communities wherever possible should decide where development occurs within their areas. However, the absence of 'sound' Local Plans and adoption of inconsistent methodologies by councils to assess Needs (often involving costly consultant-led exercises, too frequently leading to challenges and delay) have prompted the ongoing Consultation by Government into whether and how to introduce a standardised system of Needs Assessment which can be moderated locally. There have been no directives to build on Green Belt land nor changes of Legislation to effect this. Clearly though, there is a political reality and frustration that local authorities haven't all got their 'houses in order'.

Ironically, it would appear that the application of the emerging 'standardised approach' would mean that Wirral's 'Housing Need' would actually reduce and exert less pressure for a land grab. For further reasons, ITPAS and others (Wirral Society and CPRE (Campaign for Protection of Rural England)) argue strongly that the 'Development Needs' of Wirral have been significantly overstated through mistakes, a lack of rigour and imagination, and the adoption of unsound and even "aspirational" rather than proven assumptions on Growth.

These overestimates are exposed all the more starkly by current and likely impacts of Brexit and lower than predicted Productivity. Several groups including ITPAS have lodged detailed Responses to the Consultation exercises of both WBC and the LCR, pointing out errors and making imaginative, positive suggestions as well as the case for better and more extensive use of development opportunities elsewhere than in Green Belt.

Unless corrected, overstating the 'Development Needs' of Wirral would have the effect of putting undue and unnecessary pressure on Green Belt, but that is only part of the story.

Earlier this year, WBC's Consultants (somehow) concluded that satisfying the assessed Housing Need of Wirral would most likely involve building on some Green Belt. This is a statement that ITPAS and others have strongly contested and given reasons why this should not be the case, including:

- (i) 'Housing Need' has been considerably overestimated through errors in methodology and calculation;
- (ii) Figures include 'aspirational' rather than actual or derived ones, and over-optimistic projections based upon and beyond the highest scenarios of any 'sensitivity analysis' (i.e. what-if-higher, -lower, etc.);
- (iii) No account has been taken of the current downturn and relevant predictions surrounding 'Brexit'. (LCR's exercise amazingly says this should be ignored as it is too difficult to judge). At the very least, it should be a factor in estimates for the next five years as the downturn is real, and any upturn is thought to be beyond that timescale (the period of the new Local Plan before its next review/revision);
- (iv) No account has been taken of the further reduction in the predictions for Growth in the Economy; and any significant upturn in the Economy, if within the first five years, could be catered for by special measures and by moving into the second five-year allowances of the Local Plan;
- (v) There are errors in the Council's identification of 'Brownfield Sites' amounting to a considerable underestimate of available sites. ('Brownfield' is previously developed land with redevelopment potential, often industrial/commercial but not always. It can be for Housing. Sites can have on-costs of remediation of contamination from previous use - some financial assistance can be obtained);
- (vi) The capacity of listed Brownfield Sites has also been underestimated. Many more homes could be delivered from registered Sites. ITPAS has identified further 'previously developed', non-Green Belt sites within its area (and others beyond it) which could add even more capacity for new dwellings;
- (vii) Capacity of 'Wirral Waters' (Dockland) to deliver homes and other developments is very understated.

ITPAS and others consider that these and other factors have distorted the true position, to the extent that the Council's Reviews are so flawed and have critically wrong conclusions, particularly regarding any necessity to make inroads into Wirral's highly prized Green Belt, that the process should be held pending a review of the arguments put forward in the various Responses to the Consultation exercises to date and those due by 6th December 2017. However, it is feared that there could be pressure to continue on regardless.

There is no evidence that WBC and its Consultants have worked from the standpoint of residents: that is from an instruction NOT to release Green Belt but to use imagination and talent to derive ways to deliver what is required using only existing areas. Maybe it is time to stop allocating land to specific single uses, each at a level beyond the highest estimates of likely need plus a contingency. In the past, this has led to vast areas of dereliction remaining unused and ugly, caused blight and distorted the economics of redevelopment.

Such an out-dated and crude approach, beside leaving areas unredeveloped, unattractive and economically 'poor', spreads out whatever development does occur, causing 'sprawl', loss of community identity by infilling, Green Belt encroachment, and increases commuting travel, loss of leisure time, fuel/energy consumption and 'carbon footprints' when the reverse is called for by Government Policy and the majority of the general public.

Wirral Borough Council's Appraisal of Green Belt Sites:

Local Residents are rightly concerned at the Council's recent Appraisal of Green Belt sites, which included their capacity for new dwellings. Firstly, it should be pointed out that there have been no Planning Applications nor any Approvals, even in principle, regarding any of the Green Belt Sites appraised. In addition, the Council stresses that the act of appraising these Sites does not mean that it will conclude that any of those Sites should be earmarked for Housing within the emerging Local Plan. However, ITPAS and others argue not only that the case for any loss of Green Belt has not been proved but also that, in the event that some loss is *proved* to be necessary, the thrust of the Appraisal process has been deficient.

Next, the classification put on **ALL** appraised Green Belt Sites in the ITPAS area is 'Category 3', defined as: "*sites considered not currently developable and subject to constraints which may only make them deliverable within an 11-15 year period*". (Other Categories are: *Cat 1: "sites considered to be suitable for housing and which could be delivered within 5 years"* - all 'Previously Developed' (PDL), non Green Belt sites; and *Cat 2: "sites considered to be developable but which may have some additional constraints which mean that they are more likely to be delivered within a 6-10 year period"* - all 'PDL' or vacant plots; none are Green Belt).

Whilst this is encouraging, we must not be complacent. There might be a scenario, even after correction of the Council's assumptions and methodology (or more likely if assumptions/methodology are not changed) where the emerging Local Plan includes some loss of Green Belt. ITPAS has thought it essential to examine this scenario (unpalatable as it may be) because, if it is to occur, it should be for local residents to agree (if possible and permitted to) where such losses are located. ITPAS has considered the merits of all Sites on the Council's Appraisal List in order to be in a position to argue strongly and in an informed way case-by-case during the next stages of the Local Plan's evolution. It may be sensible for there to be a Residents' meeting in the New Year, once there is a better indication of the outcome of the current Consultation exercises.

A strong criticism of WBC's Green Belt Sites Assessment process, pointed out by ITPAS, is that its approach runs counter to the core principles of Green Belt. By limiting its scope to Sites adjacent to existing housing, it would lead to

sprawl, infilling between distinct communities, loss of identity and openness, reduction of local amenity, overstretching of local infrastructure and facilities (including Health, Educational, etc.) and more.

Instead of solely considering Sites adjacent to existing housing in the Assessment process, there should have also been an examination as to whether there is an opportunity (or opportunities) to expand an existing hamlet or create a new village whilst ensuring that openness, views, 'green corridors' and distinct communities remain. This complementary type of approach to the Assessment Review is totally absent despite there being opportunities through such an approach to minimise any damage to existing communities. ITPAS believes this to be a serious omission and flaw, and that such an approach could have merit and support, whilst we still maintain our blanket objection to inappropriate development within Green Belt and remain determined to continue to act to preserve our Area's wonderful setting. And we appreciate our Members' support for the work we do, voluntarily and with no legal 'teeth' but our determination.

Meanwhile, the Council's background documentation on this whole Review is available to all on WBC's Website. The principal current Consultations (Brownfield and Green Belt) with their Deadlines of 6th December 2017, can be responded to by anyone by sending an email to forwardplanning@wirral.gov.uk.

ITPAS hopes that the above sheds some light and gives some encouragement.

Update on ITPAS's regular work of appraising and reacting to Planning Applications in our Area.

Whilst the vast majority of Applications that the ITPAS Committee reviews each month are non-controversial, domestic extensions and small infills, there are a several which are of wider concern, particularly those within or 'washed over' by Green Belt. These are examined in detail and we lodge formal Objections and/or make constructive suggestions as deemed fit. And it would seem that ITPAS does have a positive impact.

A few recent such Applications include:

Greenheys Nursery, Thurstaston Road: The Applicants are seeking a 'Lawful Use Certificate', to establish that it was (and by implication still is) a commercial market garden. ITPAS objected as the wording of the Application included several terms which were deemed inappropriate but could be helpful to any application for housing on this Green Belt site down the line. A long-disused small Nursery where fixed greenhouses previously occupying only a small part of the site have become dilapidated and crumbled back into the landscape (thereby reverting to unused Green Belt) was being described in very different terms.

Heatherlands: ITPAS supported the redevelopment for housing and hoped for an early start on site. We had made suggestions to help the new dwellings fit in better with their neighbours and for some public parking to address congestion. The design was improved but the accommodation mix and lack of public parking in the approved scheme were not as desired. Recently, a further revised Application was lodged which increased the scale of development on site (probably also improving viability). ITPAS again supported residential redevelopment in principle but regretted what were considered to be retrograde steps in the appearance and form of the buildings, and has made suggestions in order to make the scheme's appearance more appropriate to its Green Belt setting and bring the start of construction forward as soon as possible.

Hillbark Hotel: The Hotel had been given a 5-year Consent to erect and operate a large function marquee within the historic, Green Belt setting but with strict Conditions including reinvestment in the restoration of the historic building and a deadline for reapplication for any continuance of the Consent. After that deadline passed without reapplication, there was no enforcement by the Council of its own Conditions (including regarding works to the old building). Eventually, an Application was made to extend the original temporary Consent and for approval of several significant, unauthorised changes and additions that had taken place.

ITPAS received no clarification from the Council as to the action which was to be taken regarding those items or the unsightly shipping containers, poor staff accommodation and growing, unhealthy and unsightly accumulation of discarded equipment despoiling the Grounds and views across the Green Belt of Royden Park. Despite many communications and promises from the Council and two 'Freedom of Information' applications from ITPAS, which were met with silence "for legal reasons", it has taken until very recently for the Council to refuse these further Consents. We now await explanation and the next steps, which hopefully will be constructive and lead to a successful venture operating happily in its attractive setting.

ITPAS is against any new residential development in Green Belt and the loss of any sports fields or community assets. It has recently put in a Response to WBC's Consultation on Playing Pitches, highlighting the error in the consultant's assessment that the Irby Playing Pitches (Irby Park) are of a good standard (as they are unplayable owing to poor drainage for much of the season) and pointed out that, having been burned out, the Changing and Storage facilities are no longer satisfactory but require to be replaced.