

20 July 2022

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Local Plan,
Wirral Council,
Wallasey,
Wirral,
CH27 9FQ.

Dear Sir / Madam,

REPRESENTATIONS TO THE WIRRAL LOCAL PLAN REVIEW REGULATION 19 PROPOSED SUBMISSION PLAN

This letter has been prepared by Turley on behalf of Bloor Homes North West ('Bloor'). It sets out Bloor's submission to the Regulation 19 Wirral Local Plan Review (Reg 19 LP) in respect of 'Land at Saughall Massie Road, Greasby' ('the site'). A site boundary plan is included at Appendix 1.

The site-specific representations should also be read alongside representations made by Lichfields on behalf of a consortium of housebuilders ('the Consortium'), including Bloor. They comprise a series of Technical Papers which together demonstrate that the DWLP is unsound as it currently fails to make adequate provision for housing, proposing a housing requirement which is too low, by not identifying sufficient supply to accommodate the requirement (let alone the higher requirement) and by not properly assessing the viability of supply (with the result that supply is further constrained).

The Consortium's evidence demonstrates that exceptional circumstances therefore exist and that there is an urgent need for Green Belt release, and the identification of suitable sustainable developments sites which can contribute to ensuring that its housing needs are met in a sustainable manner (catering for all needs). The Land at Saughall Massie Road represents a site which, although currently in the Green Belt, is capable of accommodation c.275 dwellings as part of a high quality and sustainable residential development.

LAND AT SAUGHALL MASSIE ROAD, GREASBY

The site measures 12.7 hectares in irregular in shape, on the western edge of Greasby. The site is currently used for pastureland, with a stabling block and grazing paddocks to the west.

The site is relatively flat, with a regular field pattern delineated by native hedgerows and Arrowse Brook running along the eastern/south-eastern boundary. There is a small pocket of mature trees in the north-eastern parcel, otherwise trees are limited to the southern boundary, mixed within the hedgerow. The site boundaries comprise of continuous native hedging planted aside a post and rail fence on the northern and western boundaries, whilst Greasby and Arrowse Brook form the eastern and southern boundaries, with heavy planting and mature treeline along the edges of Greasby Brook.

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The site is capable of delivering c.275 dwellings across 4.8ha of the site area at a dwelling density of 35 dwellings per hectare (dph), with the remaining land set to public open space, biodiversity and landscaping (including sustainable urban drainage).

Access is currently gained from multiple locations along the northern boundary, from Saughall Massie Road through a range of field gates and more formal laid access aprons. However, to serve the residential development, two new highway junction points would be created in the north-western corner and approximately mid-way along the northern boundary. The stretch of highway to the north of the site has dedicated and segregated cycleways and good footpath provision, connecting the site with Greasby and a large variety of day-to-day services and facilities only a short distance away including the Co-Op foodstore, The Willows Hotel Public House, Takeaways and hairdressers/beauty salons only 1.2km to the east.

There are existing Public Rights of Way running through the site, with the potential for these to be retained/improved as part of the proposed development improving connections of the site with Brookdale Primary School to the south, along with connecting the site to the various services along Greasby Road: Church, Pharmacy, Public House's and shops. The appended Concept Plan shows the connectivity of the site in relation to services and facilities.

THE DRAFT WIRRAL LOCAL PLAN

Wirral Council has undertaken two stages of consultation on its new Local Plan to date. The first in 2018 was a 'Development Options Review' (DOR). The DOR considered potential options for accommodating a housing requirement of 12,000 dwellings. This included a number of draft allocations some of which were Green Belt sites.

The DOR was followed in early 2020 with a further consultation on Issues and Options (Regulation 18). The Issues and Options was based on a housing requirement of 12,000 homes between 2020 and 2035 with the figure calculated using the standard method (with no uplift) – 800dpa. It included preferred options for strategic matters including the spatial strategy. The preferred approach was for Option 1A - Urban Intensification involving no loss of Green Belt (though it was acknowledged that some Green Belt release may be required). This reflected a significant level of public opposition to the principle of Green Belt release.

The DWLP housing requirement is 13,360 over the plan period 2021 to 2037 (835 dpa). This is based on the standard method plus a small uplift (6 dpa) to support economic growth and 50 dpa allowance for demolitions. It identifies a total supply of 16,521 with a recognition that not all of the identified supply will be delivered (though the DWLP contends that the housing requirement will be met).

It proposes to meet all of this within the urban area (with a focus on specific 'Regeneration Areas' (RAs) in and around Birkenhead and the main urban area to the east of the M53) - around 50% of the supply is located in these areas - and existing settlement boundaries. No Green Belt release for housing or employment is proposed.

COMMENTS ON PROPOSED SUBMISSION (REGULATION 19) LOCAL PLAN

These comments are provided alongside the Consortiums' submission and focusses on the relevant policies not covered in their representations, focussing on the spatial strategy and relevant strategic policies, in addition to the Green Belt Review which forms part of the evidence base.

Spatial Strategy

Policy WS1 sets out the Development and Regeneration Strategy over the plan period, with policy WS1.1 focussing on housing (need, distribution and supply). Around 50% (8,679 dwellings) of the claimed supply is from the RAs, through a combination of allocations and an allowance from RAs as broad locations envisaged to come forward in

later years of the Plan. There is further imbalance within the RAs, with seven of the 10 RAs which include a residential component, being high density schemes within Birkenhead.

The proposed spatial distribution is flawed and contrary to the LP Vision and Strategic Objectives which seek to *inter alia* enable the provision of sufficient housing to meet identified local housing needs and choice¹. The DWLP Vision refers to Wirral in 2037 offering ‘*a high quality of life to all*’, ‘*an attractive place to live*’ and which ‘*makes a significant contribution to the economic competitiveness and international standing*’ of the City region. The Vision also specifically refers to the role of towns and villages in West Wirral, and seeks that they ‘*remain stable having experienced small scale incremental development that has allowed them to continue to thrive within a landscape protected by Green Belt designation*’.

The proposed DWLP approach will fail to capitalise on the opportunities presented beyond the RAs such as the existing housing areas of West Wirral, which offer the potential to support Wirral’s economic growth and ambition. Furthermore, the lack of diversity in the supply - with an emphasis on high density urban schemes - poses a significant risk that Wirral’s housing needs will not be met both in terms of the overall amount but also the type of housing, with the Council’s evidence demonstrating a need for c. two-thirds 3+ bedroomed dwellings.

West Wirral represents c.50% of the population in some of the least deprived areas in Wirral. Delivering new housing in these locations has the potential to significantly contribute towards the Vision and SOs, in a way that the RAs cannot. Principally, these areas offer the potential to support the economic competitiveness of Wirral in the short term and over the remainder of the plan period. Sites such as Bloor’s site to the west of Greasby can accommodate high-quality family housing in an attractive landscaped setting, in a sustainable location. The ability to deliver Bloor’s site is not dependent on public sector funding or significant infrastructure requirements. It is a low-risk site capable of making an important contribution to Wirral’s success and delivery of the DWLP.

Bloor’s site is a representative example of the advantages that can be achieved with a better-balanced distribution. This can be achieved in parallel with the urban regeneration objectives of the DWLP, reflecting that directing a larger proportion of housing growth to West Wirral need not undermine the regeneration of East Wirral. A better-balanced supply therefore offers the potential to meet a wider range of objectives and aspects of the DWLP Vision than the present spatial distribution.

Green Belt land

Wirral’s Green Belt forms part of the wider Merseyside Green Belt, with just under half (45%) of the land area of Wirral designated as Green Belt. As part of the DWLP preparation, a Green Belt Review² (GBR) was undertaken in 2019 to provide an objective, evidence-based and independent assessment of how the Green Belt contributes to the give purposes of Green Belt set out in national policy³. The site lies within Parcel 5.11 which the GBR considers⁴ to make an overall weak contribution to the Green Belt. Bloor generally agrees with its conclusions, although would question whether the contribution to Purpose 3 (which the GBR assesses as moderate) has been overstated. The entire assessment parcel has defensible boundaries on all sides, contrary to the view of the Green Belt Review: the northern and western boundaries are defined by existing highway infrastructure and whilst the landscape is generally flat in this location, the settlement provides an urbanising backdrop and contains views. The site (and wider parcel) is therefore well contained and would be capable of ensuring that further encroachment beyond the parcel boundary does not happen in the future.

Having identified that the Site makes a weak contribution to the Green Belt, this should be given appropriate weight as part of a site selection process. The site selection should consider sites within the Green Belt – it

¹ Strategic Objective 7

² [Green Belt Review 2019](#)

³ Paragraph 138 NPPF 2021

⁴ [Green Belt Review Appendix G](#)

presently does not – and should take into account the opportunity to accommodate development in a form that would align with national policy requirements for meeting identified requirements for sustainable development and the revised spatial strategy as advocated above.

Site Assessment

The Local Plan is required to identify sufficient ‘developable’ sites to meet the need for housing over the plan period in accordance with the NPPF. A developable site is one which is:

“...in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.”⁵

Guidance on how the identification, assessment and allocation of sites should be carried out is provided in the Planning Practice Guidance⁶ that accompanies the NPPF. The Site Assessment Methodology is then used to assess and allocate sites in the new Local Plan.

A site does not have to have planning permission to be considered developable nor does it need to be explicitly proven that the site is ‘available’ for development at the time of the Local Plan’s adoption. Bloor considers the site to be developable over the plan period, for the reasons set out below, and that the site offers opportunities to deliver better balanced distribution, with potential to meet a wider range of objectives and aspects of the DWLP Vision than is currently presented in the spatial distribution.

Site Suitability

The subject site provides an excellent opportunity to deliver c. 275 dwellings, including a range of types and sizes in a form which meets the need identified in the Wirral Strategic Housing Market Assessment for c.70% 3+ bedroom dwellings and a policy-compliant proportion of affordable homes. The site is therefore able to offer an important contribution to meeting Wirral’s housing needs.

The site is in a sustainable location, on the edge of the existing built-up environment with residential development to the east and south, providing a continuous form of development that would reflect the immediate local characteristics and respect the residential setting. The site is afforded good accessibility to a range of services and facilities, by a range of alternative modes of transport. The development of this site can also improve the recreation provision in the local area, through improving connectivity, enhanced open space provisions and accessibility to healthy lifestyles. The site can provide for a new, strengthened boundary to the settlement through native planting at the outer edge, supplementing and reinforcing the already durable and strong highway boundary, through enhanced screening which is capable of enduring beyond the plan period as required by national planning policy.

Site Achievability

The site is considered achievable for residential development through being easily accessible of an established adopted highway with good pedestrian and cycle provisions.

In addition, there are no significant environmental constraints which would limit or impact upon development. The majority of the developable area is in Flood Zone 1, with only the brook and its banks in Flood Zones 2 and 3.

There are no listed buildings or Scheduled Ancient Monuments within the site, with only a handful of Grade II listed buildings to the north-east, on the opposing side of Saughall Massie Rd, whereby their setting and character can be protected through intervisibility, distance and landscaping. The site does not lie within any Conservation Area,

⁵ Annex 2 NPPF

⁶ <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>

although Saughall Massie Conservation Area lies on the opposing side of Saughall Massie Rd, nonetheless the site lies outside and development can be achieved to be sympathetic to and respect the surrounding character.

The site is not within, adjacent or near to any international, national or local ecological asset and there are no known contamination issues of the site, due to it being former grazing/pasture land.

Site Availability

There are no legal issues of ownership with this site being made available for residential development. Bloor have control of the site and are promoting the site through the Local Plan process. By virtue this test can be satisfied through the involvement of a housing developer (Bloor), with a proven track record of bringing forward similar schemes, both local to Wirral and further afield.

The Site has therefore been demonstrated to be developable, being suitable, available and achievable, and to represent a sustainable development opportunity which encompasses benefits in economic, social and environmental terms. In a context where Green Belt release is required to meet housing needs (see the Consortium representations) this Site is entirely appropriate for allocation.

At present, the Regulation 19 Local Plan is based on a deficient evidence base with respect to the assessment of Green Belt release and an unsound spatial strategy which is not justified, not positively prepared, contrary to national planning policy and not effective. The Regulation 19 Local Plan is therefore unsound. Soundness can be corrected through the release of the subject site from the Green Belt and its subsequent allocation.

I trust these representations are of assistance in considered the further development and progression of the Local Plan.

Yours sincerely

Ollie Thomas
Associate Director

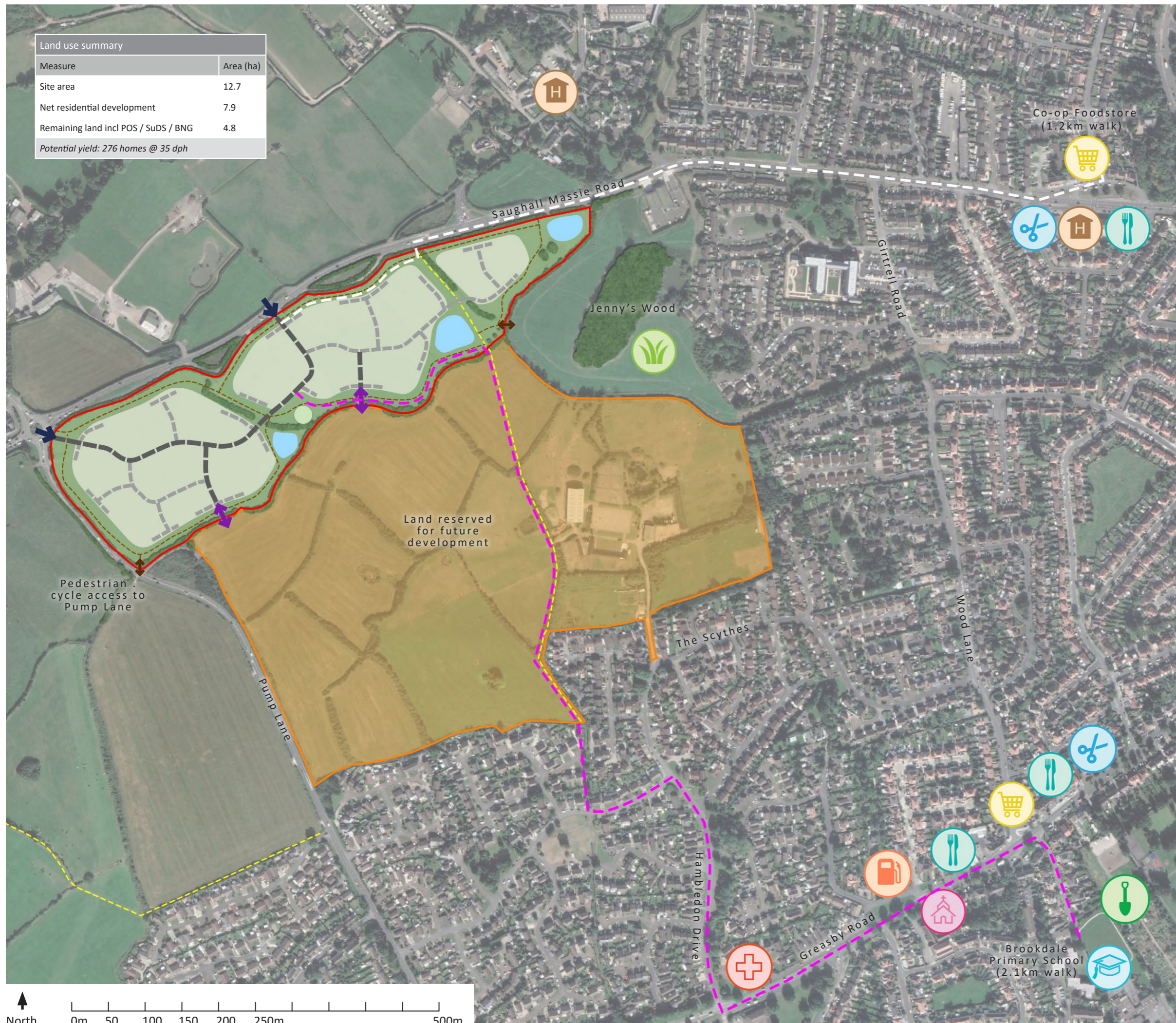
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Appendix 1: Concept Masterplan of the Site

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Land use summary	
Measure	Area (ha)
Site area	12.7
Net residential development	7.9
Remaining land incl POS / SuDS / BNG	4.8
<i>Potential yield: 276 homes @ 35 dph</i>	



KEY:

- Site boundary
- Land reserved for future development
- Existing vegetation
- Existing public right of way
- Potential access point
- Indicative access to land reserved for future development
- Pedestrian / cycle connections
- Primary road
- Secondary road / shared drive
- Residential development
- Open space
- Proposed footpaths / cycleways
- Local equipped play area
- Potential SuDS attenuation (subject to design by others)
- Pedestrian route to Brookdale Primary School
- Pedestrian route to Co-op Foodstore



Land at Saughall Massie Road, Greasby

Concept Masterplan

Drwg No: 967-01
Drawn by: SB
Rev by:
QM Status: Checked
Scale: 1: 2500 @ A3

Date: 13.06.22
Checker: NJ
Rev checker:
Product Status:
Review

