

## **IRBY THURSTASTON & PENSBY AMENITY SOCIETY**

Founded 1974 Registered Charity No: 1150756

www.itpas.org

## Green Belt Risk - Our Council's Record

No Government has determined how many homes are to be built by Councils since Labour's Housing Targets were abolished. All Wirral's figures stem from the Office of National Statistics (ONS, a non-ministerial department, independent of Government, reporting directly to the UK Parliament). It is the ONS who have published revised figures recently, which are very helpful to the case against release of Green Belt and should prompt a change in our Council's course. The Council Leader's latest contention, that his pressure brought this about, is both misleading and plain nonsense, borne of trying to 'get off the hook'?

Wirral Borough Council's (WBC's) own projections of Growth (of population and local economy) and those of their Consultants, together with ONS figures were/are applied to a Standard Formula (agreed by Parliament for all councils). There is wide acceptance that WBC's Growth Predictions were/are exaggerated, a contention supported by the latest published data.

There is flexibility around the methodology of arriving at an 'Objectively Assessed Housing Need' (OAN) and Councils are urged by Government to challenge the 'formula' results in order that local and 'Exceptional Circumstances' may be taken into account. WBC has NOT challenged Wirral's results in any meaningful way nor taken up the opportunities offered to discuss and develop the standard methodology or the past resultant figures with the Centre.

WBC's past and current approach has led to widespread concern of a determination to release Green Belt to show some development is occurring and reap a financial benefit. This concern was heightened by the WBC Officer Presentations at recent Public Meetings and suggestions since the much lower ONS figures were released that some Green Belt will STILL be released. WHY?

In no particular order, there follow TEN points which fuel that concern. ITPAS would be pleased to see these points and others addressed and to witness Council actions mirroring its statements, including their being "Defenders of Wirral's Green Belt", determined to AVOID release of Green Belt land, transparently applying an approach which is aimed at that very conclusion and one which adopts a 'Brownfield First' policy based on a rigorous exercise to maximise its Brownfield Site Register and its development potential, including through applying appropriately higher densities of modern development than previously assumed (needing a lower land take).

- 1. Wirral's strategy over various policy introductions (e.g. Parking Charges) appears to be: overstate the case, draw back, claim credit but implement the measure to some degree.
- 2. There is a growing track record of allowing Green Belt development when Brownfield options exist. e.g. Saughall Massie Fire Station, where mass protests and the presence of important archaeology were reportedly ignored.
- 3. WBC's Consultant's Main 2016 Report makes it clear that the Council had provided the Growth Assumptions (proved to be exaggerated) to put into the Standard Formula-based Local Plan system Phil Davies' own figures?

- 4. Options for using inherent flexibility and arguing modification of the scale of Housing Need, though encouraged by national policy and the Secretary of State, had NOT been taken up meaningfully. 'Exceptional Circumstances' and historic Local Factors had NOT been pushed.
- 5. Errors pointed out during WBC's Brownfield Register Consultation process have led to reductions of availability but few, if any, additions, with the Officer statement that those identified as additional would be reviewed/appraised next time ... i.e. in 15+ years?
- 6. Were the Council determined to protect Green Belt (as now claimed), why did it keep quiet for 2 years about its Consultants' conclusion in 2016 that Release of Green Belt land was inevitable? Surely, the Consultants would have been required to find circumstances where this was NOT inevitable, arguing a more reasonable, lower Growth Rate. NO such action!
- 7. The Council continued to argue its case (of inevitable and "enforced" release of Green Belt) even when there was updated data available (before the latest reductions) showing that their Growth assumptions were far too high, especially as the Local Plan process is required to keep up-to-date with relevant input figures. It did not keep up-to-date. WHY?
- 8. Notwithstanding natural caution over developers' statements, Wirral Council has for many years worked alongside Peel Holdings on 'Wirral Waters', whose estimates of the scale of residential and other development have kept remarkably consistent. It is thus difficult to appreciate why just 1,100 new homes rather than Peel's 6,450 commitment have been included within WBC's Draft Local Plan for the FULL 15-year span and NONE at all during the first 5-Year Period (where more certainty of deliverability of Housing Need is required).
  - Presumably, the Council was clear that proposals were "reasonable and demonstrable" when it granted Peel Holdings Outline Planning Approval for 13,500 new homes; and especially so as the WBC's own Presentation at Public Meetings confirmed that the First Phase Projects were now all "fully viable" (owing to the  $\pounds 6m$  infrastructure funding from Government and other beneficial status and measures) and deliverable within the first 5-Year Period.
- 9. The response to our and others' enquiries (why only 1,100 'Wirral Waters' homes were in WBC's Brownfield Site capacity figures) was that detailed Planning Consent is necessary before schemes can be included. This is fundamentally incorrect and runs counter to the 2017 Appeal Court Ruling which made it clear to Councils, developers and others that developments only need to be "reasonably possible", not even "probable" and definitely not "certain" or of proven deliverability. Why was this Ruling not applied as it would have significantly tipped the balance towards NIL release of Green Belt?
- 10. ITPAS had provided the Council with its own detailed appraisal of ALL Green Belt Sites within its Area (Irby, Thurstaston, Pensby, Thingwall, parts of Greasby, Barnston, Heswall), using Criteria for exclusion from consideration publically consulted upon by WBC and used in their Consultants' own Appraisals, plus the 5 Principles of Green Belt and other key factors in WBC publications. ITPAS's assessments (representing over 600 residents) and WBC's own Criteria for exclusion of Sites were almost completely ignored in the rushed and flawed shortlisting of 48 Green Belt Sites. WHY?