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16 August 2018

The Rt Hon James Brokenshire MP
Department for Housing, Communities and Local Government
2 Marsham Street
London
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030 3444 0000

**Re Wirral Metropolitan Borough Council (WMBC)
Local Plan and desecration of Green Belt farmland**

Dear Secretary of State,

I am sure you are well aware of Wirral Metropolitan Borough Council (WMBC), being one of the three selected for “special treatment”, due to their failure to develop a Local Plan.

Some background as to the Wirral:-

The Wirral is effectively an island, bordered by the River Dee, Liverpool Bay and the River Mersey. There are no adjacent lands there that can be swapped to offset loss of the Green Belt. To the South we have Cheshire West and Chester (CW&C) borough that has apparently refused any transfer of housing “need”.

Wirral has historically had an ageing and declining population (ref UDP and Draft local plans since 2000). Any new housing must be to meet the housing needs of this ageing population and the few young.

Current house prices mean the only growth in population is from only well off pensioners who can move to the area, increasing the massive load on Social Services and the NHS, destroying the Council’s hoped for increase in net income from more Council Taxes.. if WMBC collects them.

The Wirral is not the South East of England, we do not have a massive housing “problem”, rather the problem of having a system that can only consider housing growth inappropriately imposed upon us.

Four years ago, the Council met the housing “need” with some 50% excess AND had a draft Local Plan. What happened?

Some 40% of workers living in WMBC work outside the borough. Any creation of good jobs in the borough would surely attract some of them, without any need for new housing. Personally I'd have been delighted at a 20 minute commute rather than living on the M56 / M62 / M6 etc..

Much of WMBC's Green Belt is farmland or could be farmed. You cannot farm a housing estate. With the unknowns of Brexit, loss of any potential or actual farmland is UNSUSTAINABLE. (ref NPPF focus on sustainable development).

Green Belt land contributes to reducing Global Warming. Housing estates add to Global Warming. It is surely UNSUSTAINABLE (NPPF) to lose any more green spaces to housing

WMBC have now produced a plan showing the Green Belt lands that they "have to" take out of the Green Belt in order to meet "YOUR" theoretical Housing Need. Reportedly to accommodate five times the theoretical need.. is this valid?

WMBC's Labour group must have forgotten the highly optimistic figures for growth and population that they submitted in the first place to create this massive **theoretical** housing need.

The historical Regional Spatial Strategy for the Wirral borough was for some 250 new houses per annum. That alone being under third of the new **theoretical** need should cause questions. Wirral borough has traditionally delivered far less than this. Further, under (Lord) Prescott's "Pathfinder" policy, hundreds of houses were bulldozed. A few are only now being rebuilt. This surely must show a massive flaw in the "housing need" methodology of the past and the present given that the Council has reduced the available housing and yet we have little or no homeless in the borough.

A housing "need" of some 150 - 200 per annum is surely all that is needed and can easily be met from the massive brown field resources in the old industrial areas of Wirral borough. (As per the 5th principle of the Green Belt - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.)

The borough has a massive 6,000 empty homes, surely it is UNSUSTAINABLE to ignore these and demand the loss of Green Belt farmland to meet a **theoretical** need.

The borough is the home to the massive Peel Holdings development of "Wirral Waters", with the potential of some 13,000 housing units in its lifetime and a reported 6,000 units within the time of the Local Plan, although this is for some reason not being accepted by the Labour Council's Cabinet.

The empty housing and the provision at Wirral Waters surely meets the massively overstated theoretical "need" of some 12,000 units in the lifetime of the Local Plan.

I believe that the Appeal Court (Lord Justice Lindblom) has ruled that to be considered, a development **need only be possible, not definitely deliverable**. Hence some if not all of Wirral Waters 13,000 units must be considered.

Then there is the space for housing available on brown field land in addition to Wirral Waters.

Then there are the housing permissions already granted but not being developed.

WMBC's Labour Cabinet continues to present itself as the protector of the Green Belt yet conveniently forgets its role in continuing expenditure to promote the Hoylake Golf Resort (enabling housing estate on 250+ acres of Green Belt farmland) and the Fire Station on Saughall Massie Green Belt that it recently drove through against massive local opposition.

One is at pains to understand how this Council is meeting the guidelines of the NPPF (2018) for re-assessing the Green Belt, especially with plans that would reduce the Green Belt from 46% to some 33% a massive unjustified reduction.

Surely, it is time for the government to intervene and put this Labour Council under strict Central Government "guidance", starting with a review of the senseless optimistic figures that it presented in the first place.

I understand there is the "threat" of handing the Wirral's local Plan over to Liverpool... that would really cause a massive loss of faith in the Conservative government if you allowed that to happen.

It may be only a coincidence that Wirral's Labour Cabinet is forecasting great economic growth that the Council Leader, Cllr. Phil Davies, is the lead for Economic Regeneration for the whole Liverpool City Region. We can only hope not.

Sir, you may believe that we have "localism" here, but may I remind you that Wirral borough was made part of the Liverpool City Region without a vote, and we had a Metro Mayor imposed on us again without a vote.

We have uncontrolled "localism" and look to you to provide necessary control.

Sir, we are not all Corbynistas in the North West and did until recently have Conservative MPs.....perhaps we will again....

It is time for you to show that the Conservatives care, otherwise why should anyone bother to vote Conservative in the future?

Yours sincerely,

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