

This is the third Draft Local Plan since 2010 that Wirral Metropolitan Borough Council (WMBC) has consulted on. (possibly the fourth). There must be grave concern that the complexity of the 88 questions in the response form are far beyond the abilities of the average Ratepayer to comprehend. The value of the consultation must be viewed against this.

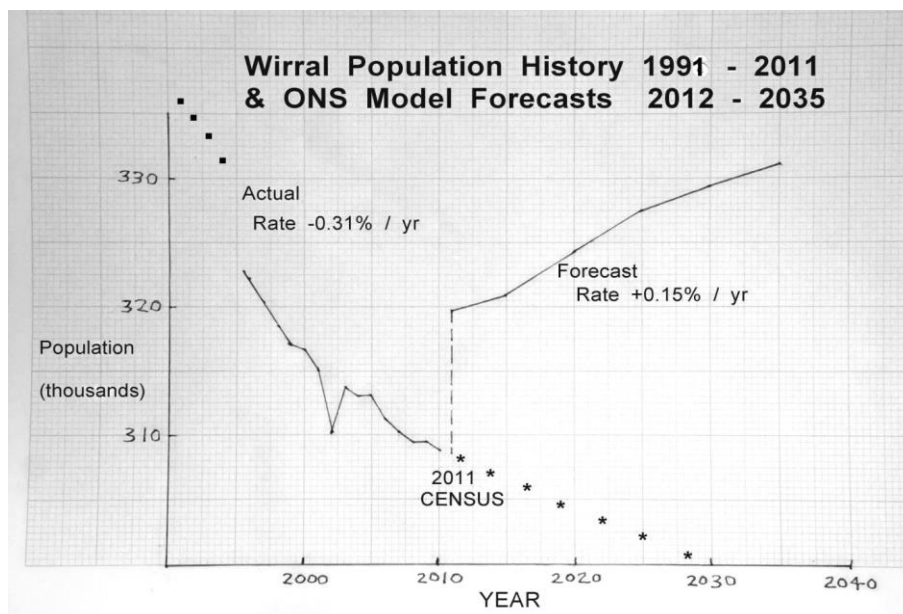
The last consultation was totally unstructured, and the Council was unable to provide any meaningful feedback, despite there being over 3,000 responses.

Special Circumstances for the Borough

1. The Borough is on a Peninsula, there can be no option to “land swap” on three sides as they are sea / river. To the South CW&C Council seem “unable” to assist.
2. The much hoped for new jobs have failed to arrive, the numbers continue to fall. Any “good” jobs created would surely be taken up by many of the 40% or so of residents who must commute to work outside the borough.
3. The population is aging and declining, as shown over the last 30? years. Over the next twenty years (say) the only reality will be their houses becoming available on the second-hand market as the residents will have “passed on” in one way or another. The decline in occupants per household may be seen as a “need” for housing in some parts of the country. For the Wirral it merely reflects the demographics with residents leaving households... in a box.
4. This supposed “need” for some 12,000 new homes is contrary to the Council’s OWN Compendium of Statistics that clearly states a figure nearer a third of 12,000+.

The Council’s 12,000+ housing “need” is based on optimism that borders on “creativity with the truth”. It would imply a growth of population of some 20,00 to 30,000 people. Where are the high value jobs for such numbers, enabling them to buy or even rent these new houses?

This graph by Professor D. Gregg highlights one of the massive variances in this matter.



With the ageing population literally “dying off” is there **any** need for new housing?

The Council’s Draft Local Plan approach seems to be to produce a something that could be called a “Local Plan” to avoid being placed in “Special Measures”. This 3rd or 4th attempt AGAIN at massive cost to the ratepayer is now with the additional cost of retaining a QC and Consultants.

The **lack of Strategy** is a fundamental flaw. Where is the justification for the allocation of housing land versus employment land and the value of the open spaces to the developing Leisure sector, food production and the reduction of climate change and improved air quality?

The “need” for such housing numbers seems to be based on the Council’s budget forecast “need” for new income from Council Tax in the coming years. This is a deeply flawed **business case**, not a Local Plan. Without new jobs the costs associated with the “new residents” in social care, health needs and new infrastructure would outstrip any increased income from extra Council Tax. (Assuming any houses are actually built and the taxes are actually paid (on time)).

This draft Local Plan is just a deeply flawed business case.

The massive increase in housing and population proposed must surely run counter to the Council’s own “Climate Change Emergency” and will certainly not lead to a reduction in CO2 nor an improvement in air quality in the borough.

The township of Birkenhead was not created on the off chance of major industries being established in the Victorian era. It was created to provide housing for the many workers required as the new industries expanded rapidly. Most of these industrial jobs have now disappeared.

The Council refuses to accept its historical rate of empty home conversions of 250 per annum. A figure of only 90 is used, undermining their own argument of regenerating the deprived areas. There are some 4,000 to 6,000 empty homes in the Borough.

The Council uses the “fake term” of “Weakly Performing Green Belt”. This can only be a ruse to undermine the tight Green Belt, drawn to promote the regeneration of the old industrial areas and the township of Birkenhead.

There is no 6th purpose of the Green Belt, to be sacrificed by a “**Weakly Performing**” Council.

The Council uses the “fake term” of “Settlement” to devalue the Green Belt lands between existing towns and villages again devaluing the Green Belt lands there and undermining the regeneration of the old industrial and urban areas.

It would appear that the Council is using very “aggressive” planning terms to ensure loss of Green Belt and farmland. One is reminded of the methods used by accountants Andersens resulting in the collapse of Enron, resulting in massive changes to auditing in the USA.

The Council seem to have failed to make use of the central funds (£250m?) to improve brownfield land in the old industrial and urban areas. Why not?

At long last the Council are working with Peel to develop the “Wirral Waters” site, surely the largest dock area in the UK available for redevelopment. Had the Council worked with Peel from the start we could have been many years down the redevelopment of this massive derelict area.

From Peel it is understand from Peel that **with** Council support a figure of some 6,500 new homes could be developed. Again, the Council has not supported this.

In conclusion **no release** of Green Belt land is necessary.

The retention of the tight Green Belt boundaries focuses regeneration in the deprived areas, exactly as the **5th Purpose** of the Green Belt intends.