

## Comments

### Local Plan Submission Draft (09/05/22 to 25/07/22)

Comment by	Hoylake Vision Community Planning Forum (Mr Thomas Hutchinson - 1323700)
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#### Question 3

To which part of the Local Plan does this representation relate? Paragraph(s)

#### Question 3a

Please state which paragraph number(s) this representation relates to. 5.51

#### Question 4a

Legally compliant Yes

#### Question 4b

Sound No

#### Question 4b(2)

If you consider that the Local Plan is not sound, please indicate the reason(s) why:

- . Not Positively Prepared
- . Not Justified
- . Not Effective
- . Not Consistent with National Policy

#### Question 4b(3)

**Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.**

Hoylake Vision Community Planning Forum ('the Forum') produced the Hoylake Neighbourhood Plan under the provisions of the Localism Act 2011. The Neighbourhood Plan came into force as a statutory

part of the Council's Local Plan in December 2016 following a public referendum. One of the Forum's main soundness concerns with the Submission Draft Plan as whole is that it doesn't take sufficient account of the policies of the made Neighbourhood Plan. Paragraph 3.21 of the Submission Draft Plan claims the Local Plan seeks to reflect and support rather than alter the local priorities set out in the Neighbourhood Plan for Hoylake. Yet the local priorities in the Hoylake Neighbourhood Plan are not properly reflected in the priorities listed in the priorities for West Kirby and Hoylake, nor do they always translate effectively into the policies for the Hoylake Neighbourhood Area. In particular there is no framework provided for the masterplanning of the Carr Lane area, which comprises employment, housing and derelict land.

Furthermore, as acknowledged in para 1.5 of the Submission Draft Plan, the adopted Local Plan will set out strategic policies which set the context for all development and any future Neighbourhood Plans. It provides a framework for more detailed guidance such as masterplans and design codes that demonstrate how large sites or areas should develop. The Forum believes there to be missing elements in the policies for the forthcoming update of the Neighbourhood Plan, across a range of policy areas. The Forum is keen for the Submission Draft Plan to incorporate the important priorities of the local community as expressed through the consultation work and the associated technical work and for this to be a main examination matter.

The Forum is currently preparing a replacement Plan and have already undertaken two consultations led by public engagement experts PLACED [www.placedengagement.org.uk/hoylake](http://www.placedengagement.org.uk/hoylake). The first round of consultation took place in July to October 2020 and an Engagement Summary report has been produced. On the basis of community input to the 2020 consultation, the Hoylake Vision management group worked with consultants AECOM to produce a draft 'Masterplan' document and draft 'Design Guide and Codes' document for Hoylake in collaboration with AECOM and the Hoylake Conservation Areas Association. This document expands on some of the ideas in the Masterplan and sets out more detailed vision for three key areas: the Town Centre, the Promenade and the Carr Lane Area. A second round of consultation took place in 2022, the results of which are being analysed. Further consultation events are being planned.

The replacement of the Neighbourhood Plan has been delayed by the emerging Local Plan timetable. The Forum's intention has been to wait for the adoption of the Local Plan before updating the Neighbourhood Plan so that it aligns with it and supports the delivery of the strategic policies. So whilst the current Neighbourhood Planning work has no planning status yet, it provides evidence that should inform the Local Plan, in particular community aspirations and ambitions for what sustainable development means in the Hoylake context. The consultation versions of the Masterplan and Design Guide are attached for reference

Paragraph 16 of the NPPF is that Plans should be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees.

The Neighbourhood Plan can take the lead on non-strategic policies but it needs the Local Plan to provide the appropriate strategic policies, as neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area. The revised Neighbourhood Plan intends to set out detailed policies, including allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies.

This approach is in accordance with national planning policies in the NPPF, which state:

127. ...Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics. Neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and developers.

134. Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to:

a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or

b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

NPPG states (Paragraph: 002 Reference ID: 26-002-20191001) that local planning authorities are expected to effectively engage their local community when developing design policies. Appropriate policies can be included within non-strategic policies in neighbourhood plans and supplementary planning documents, such as local design guides, masterplans or design codes, which provide further detail on specific design matters.

Having regard to the above, the Forum's view is that more text is needed to reflect the content of the made the Hoylake NDP and the preferences of the community as expressed through the extensive work on the review of the Plan.

Bullet 1 - Support for the promotion of West Kirby and Hoylake as mixed use coastal resorts and tourist destinations but in terms of the mechanisms to achieve this, wording is needed on encouraging renewal and regeneration of underused and vacant sites and reference to masterplanning that does beyond just the one for the West Kirby Concourse.

Bullet 2 - Support for delivery of the local priorities identified within the Hoylake NDP but additional text is needed on the replacement Local Plan.

Bullet 7 – Hoylake District Centre is not just a neighbourhood centre serving everyday needs. It has a role as a service centre for the town and wider area as well as drawing in visitors in its role as a seaside resort. The emerging masterplan for Hoylake seeks to revitalise and reshape the underused and underperforming parts of the town to boost retail, leisure and sustainable tourism linked to its very special coastal location. The renovation of the Town Hall for a new cinema and leisure-based community hub is just one part of this process. Previous initiatives include the Council's investment in a bespoke public realm scheme for the high street linked to the 2006 Open Golf championship.

Bullet 8 – wording is needed on the need for a masterplan to address the wider issues of the Carr Lane area.

#### Question 4c

**Complies with the Duty to co-operate**

Yes

#### Question 6

**Please note** *Your representation should be as succinct as possible. You should provide all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

**Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you**

**are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Proposed wording:

Bullet 1 replace text with:

Promote West Kirby and Hoylake as complementary mixed use urban coastal resorts and tourist destinations through land allocations, policies to encourage urban renewal and regeneration and the delivery of masterplans including West Kirby Concourse and Hoylake's Carr Lane Mixed Use Area.

Bullet 2 replace text with:

Support the delivery of the local priorities identified within the Hoylake NDP and any replacement Plan.

Bullet 7 replace text with:

Safeguard and enhance the vitality and viability of the District centre at Hoylake as the focus for shops, services and community facilities to serve the town and its visitors through Policy WD 11 and the Hoylake NDP.

Bullet 8 replace text with:

Maintain the employment function of the Carr Lane Mixed Use Area for small and medium scale businesses and encourage appropriate diversification of uses and improvements to access and the environment by the delivery of a masterplan.

### **Question 7**

**Please note** that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

**If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?** Yes, I wish to participate in hearing session(s)

### **Question 8**

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

Hoylake Vision Community Planning Forum is an active Neighbourhood Planning qualifying body that has prepared the Hoylake Neighbourhood Development Plan and is currently reviewing it. It can provide a valuable perspective on Local Plan matters and wishes to engage positively with the examination.

### **Notification of Next Stages in Wirral's Local Plan Preparation**

**Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).** Yes