

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. WS 3.2

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.

Policy WS 3.2 is seriously flawed in a number of ways. It has arrived in the Regulation 19 Plan on the basis of the Wirral Density Study to enable the urban areas to accommodate all the housing requirement,

without proper consideration of the implications. The whole approach is aimed at creating significant new residential capacity on large swathes of previously developed urban land but it inadvertently incentivises demolition of high quality housing areas which have stood the test of time and should be sensitively remodelled and adapted to accommodate additional households using a design-led approach, not crude policy minima where developers risk refusal for underdevelopment.

Paragraph 3.4 of the Stages 1 and 2: Summary report (December 2019) acknowledge that the larger urban settlements to the west have the character of large villages (paragraph 3.3) and that traditionally, many of these have a suburban character, with many communities being built to a medium-low density comprising either late Victorian townhouses or villas arranged along the railway lines or 20th century semi-detached dwellings. This means that whilst many of the areas have a strong urban form, the density is relatively low, at somewhere between 20 and 30 dwellings per hectare (dph) (paragraph 3.4.). The Stage 3 Study (September 2020) decides that suburban areas around rail stations such as Hoylake are now transit areas but then does not select Hoylake as a case study area for analysis. West Kirby is selected with Table 1 stating that it has been selected because “This is a small township with a wide selection of shops and services, whilst there are some gap sites there are also other opportunities such as sub-division, backland conversion and the use of upper floors - especially in the retail area.” So essentially basing density for the historic suburban areas of Hoylake based on analysis of a town centre. This is simply unsound and it is noted that in response to consultation not one change was made to the report; all objections were dismissed.

Separating out density as a separate issue to design and placemaking is a mistake. Policy WS 3.2 forms part of the Strategy for Housing and sits with the fixed quantitative standards of this part of the Plan, divorced from qualitative considerations of placemaking and design quality. A fundamental aspect of density is understanding how a proposal would sit within its surrounding context and setting. This judgement should be an integral part of considering the appropriate density for a proposal and woven into the density policy itself.

Government policy on achieving appropriate densities (paragraph 1.24 of the NPPF) makes clear that planning policies should support development that makes efficient use of land should take into account of various criteria including the desirability of maintaining an area’s prevailing character and setting. So there needs to be explicit wording in the Local Plan policy and supporting text which articulates the importance of the surrounding context in determining the appropriate density for a housing proposal, in particular how historic character could provide a strong reason why building at the minimum density would not be appropriate.

The policy is not clear that optimising density for a site needs to take account of matters beyond the bounds of the site itself. Whilst it is correct for local policy to specify minimum density and require strong reasons a lower density than the minima would appropriate (as set out in Paragraph 1.25 of the NPPF) the problem with WS 3.2 is that it merely uses the words “having regard to site characteristics” and paragraph 3.62 talks of “any other site-specific constraints” but makes no mention of the prevailing character of the surrounding context and setting. These matters of context and setting should be as much the starting point for considering the density for a proposal as any blanket minima.

The National Design Guide issued in January 2021 sets out the characteristics of well-designed places and demonstrates what good design means in practice. It is intended to be read alongside National Planning Policy Guidance. The National Design Guide can be used by all those involved in shaping places including in plan-making (NPPG Paragraph: 001 Reference ID: 26-001-20191001). Whilst the document is positive about increasing densities, it makes clear in paragraph 66 that built form is determined by good urban design principles that combine layout, form and scale in a way that responds positively to the context. It goes on to states that appropriate density will result from the context, accessibility, the proposed building types, form and character of the development. This is much more nuanced approach than a rigid Density Zone where the onus is on the developer to justify going below the minima.

There are also particular soundness concerns with defining a blanket 50 dwelling per hectare minima for the RES-DZ3 Transit Area Residential Density Zone which includes most of Hoylake. Defining an 800m radius around the rail station and including almost all the town within it (bar the industrial area and conservation areas) is far too crude an approach. There are many reasons why this is inappropriate.

Firstly, it takes no account of how the unique historic character of a settlement underpins its economic function as attractive places to work and visit. In the case of Hoylake, its defining historic character is centred on the 19th Century leisure boom and the subsequent planned suburban growth that resulted from the arrival of the railways in the 1860s. The Victorian and Edwardian suburbs form a vital link from the rail station and linear town centre through to the beach. The historic core is centred on the spacious streets around the Royal Liverpool Golf Club founded in 1869 on a horse racing track and near to where the ferry disembarked. Whilst the two conservation areas protect this lower density core of mainly detached villas in generous plots, many of the late Victorian buildings sit within areas beyond the current conservation areas, at densities considerably lower than 50 dwellings per hectare. For example, Pevsner's account of Hoylake notes the Birkenhead Della Robbia Co. tiles on Victorian semi-detached pairs that are unlisted and outside the conservation areas. The disparity between the high density target and the prevailing density will inevitably incentivise demolition and redevelopment of high quality and characterful suburbs that are an integral part of the character of the place.

There are currently no locally listed heritage assets (the appendix of the current Neighbourhood Plan contains an informal list of character buildings) but this is now being remedied by the preparation of the new Merseyside Local Heritage List, to be compiled in 2023 using Historic England's local listing methodology. Wirral Council's stated interest

<https://local-heritage-list.org.uk/merseyside/local-area-heritage-summaries> is in these particular assets:

- Early vernacular buildings.
- Victorian and Edwardian villas of high architectural and/or artistic significance that are not currently listed or within a conservation area.
- Excellent examples of Art Deco, Arts and Crafts of high architectural and/or artistic significance that are not listed or within a conservation area.
- Buildings associated with early leisure and social activity (e.g. pubs) may be considered if they align with the selection criteria.

This adds to the argument that there are considerable heritage assets of value within the Density Zones and the policy needs to be amended to take account of them.

Hoylake and the other west Wirral settlements play an important role within the City Region as visitor destinations, particularly for day trips. Paragraph 5.52 acknowledges that the existing Hoylake Neighbourhood Plan (2016) provides further detail on local priorities to "enhance the distinctive Victorian and Edwardian character of the seaside resort". The Local Industrial Strategy of the City Region sets out a need to improve performance against the five 'pillars of productivity', one of which is 'thriving and distinct places'. The loss of distinctive built heritage risks undermining the vitality of its town centre and businesses that depend upon the visitor experience.

Another factor to take into consideration is that it is almost impossible to find examples outside major cities of new high quality family-oriented housing that achieves 50 dwellings per hectare. At most, 40 dwellings per hectare can be achieved if a traditional street grid/perimeter block layout is to be respected. The 'Streets for a Healthy Life' guide (published July 2022) is a recently issued technical companion to 'Building for a Healthy Life', which is a design assessment tool and guide for new and growing neighbourhoods. It provides examples of UK streets that meet the requirements for 'healthy streets' set out in 'Building for a Healthy Life'. Even for the Duchy of Cornwall' Poundbury urban extension in Dorset analysed in the document (P38), which relies on street parking bays, no front gardens and low parking standards, only 40 dwellings per hectare has been achieved.

The Stage 3 Density Report (3.4 finds that densities of 40 dwellings per hectare were typical within Conservation Areas) and in the town of West Kirby less than 40 dwellings per hectare. Again, no basis for selecting 50 dph.

In the recently issued St Helen's Local Plan Inspector's Report (paragraphs 84, 85 and 114) a minimum of 30 dwellings per hectare is required across the Plan area and whilst a minimum of 40 dwellings per hectare was to be encouraged in appropriate locations such as within or adjacent to town centres, this is described by the Inspector as 'high density' and increasing densities above this could give rise to 'town cramming'. The obvious issue is that 50 dwellings per hectare results in flatted forms which is at odds with the mix sought by the policies on housing need, which favour houses with individual front

doors.

In Wirral, Paragraph 3.57 of the Plan acknowledges that SHMA identifies a need for 65% of market housing to have three or more bedrooms to accommodate families and Policy WS 3.4 seeks 70% of market housing to be larger dwellings of three or more bedrooms. The explanation in paragraph 3.57 that the Council is promoting and requiring innovative approaches to providing for family sized homes at higher densities in urban and sustainable locations is not convincing for the more constrained built-up location like Hoylake which have a generally consistent scale of 2.5 storeys maximum and sites become available on a piecemeal basis, surrounded by existing homes.

The approach is also completely at odds with the car parking standards in Appendix 8 (Policy WS 7.4) which seeks minimum parking standards of 2 spaces for 2/3 bedroom houses and 3 spaces for larger houses. Whilst dispensations may be allowed under some circumstances according to the wording of Appendix 8, the fact remains that the whole thrust of parking policy is to secure at least two parking spaces on-plot whereas the prevailing character of the Victorian and Edwardian suburbs beyond the Hoylake conservation areas relies on unallocated on-street parking and streets strongly defined by landscaped front gardens and low boundary walls which are not amenable to on-plot parking. So this make accommodating new development into this setting extremely challenging at the proposed densities and with the parking standard as proposed; it will push developments towards comprehensive demolition and development blocks with grouped parking rather than sensitive adaptation and remodelling of the existing buildings to accommodate more households.

The National Design Guide issued in January 2021 sets out the characteristics of well-designed places and demonstrates what good design means in practice. It is intended to be read alongside National Planning Policy Guidance. The National Design Guide can be used by all those involved in shaping places including in plan-making and decision making (NPPG Paragraph: 001 Reference ID: 26-001-20191001). The Local Plan should take account of the following important sections:

38 Context is the location of the development and the attributes of its immediate, local and regional surroundings.

39 An understanding of the context, history and the cultural characteristics of a site, neighbourhood and region influences the location, siting and design of new developments. It means they are well grounded in their locality and more likely to be acceptable to existing communities. Creating a positive sense of place helps to foster a sense of belonging and contributes to well-being, inclusion and community cohesion.

40 Well-designed places are:

- based on a sound understanding of the features of the site and the surrounding context, using baseline studies as a starting point for design;
- integrated into their surroundings so they relate well to them;
- influenced by and influence their context positively; and
- responsive to local history, culture and heritage.

41 Well-designed new development responds positively to the features of the site itself and the surrounding context beyond the site boundary. It enhances positive qualities and improves negative ones. Some features are physical, including:

- the existing built development, including layout, form, scale, appearance, details, and materials;
- local heritage – see below – and local character – see Identity;

43 Well-designed new development is integrated into its wider surroundings, physically, socially and visually. It is carefully sited and designed, and is demonstrably based on an understanding of the existing situation, including:

- patterns of built form, including local precedents for routes and spaces and the built form around them, to inform the layout, grain, form and scale – see
- Built form ;
- the architecture prevalent in the area, including the local vernacular and other precedents that contribute to local character, to inform the form, scale, appearance, details and materials of new development – see Identity .

46 When determining how a site may be developed, it is important to understand the history of how the place has evolved. The local sense of place and identity are shaped by local history, culture and heritage, and how these have influenced the built environment and wider landscape.

47 Sensitive re-use or adaptation adds to the richness and variety of a scheme and to its diversity of activities and users. It helps to integrate heritage into proposals in an environmentally sustainable way.

48 Well-designed places and buildings are influenced positively by:

- the history and heritage of the site, its surroundings and the wider area, including cultural influences;
- the significance and setting of heritage assets and any other specific features that merit conserving and enhancing;
- the local vernacular, including historical building typologies such as the terrace, town house, mews, villa or mansion block, the treatment of façades, characteristic materials and details – see Identity .

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.

Rewording of the policy as follows:

New residential development within the Density Zones on the Policies Map should aim to achieve the minimum densities set out in the table below, unless it can be demonstrated that this is not appropriate having regard to:

- 1 The existing density and character of the surrounding area, particularly the space around buildings;
- 2 The need to retain the natural and man-made features of the site;
- 3 any other relevant site constraints

The heritage value of the site and its surroundings is an important factor that would justify a density lower than the stated minima.

In addition:

Reduce Transit Area Density Zones (RES-DZ3) minima to 40 dwellings hectare.

Remove the lower density areas north-east of the Kings Gap Conservation Area from the Density Zone as this area is under review as a possible extension to the Conservation Area. It should be noted that Drummond Road is already excluded from the Transit Area Density Zone, despite being close to the rail station. See attached pdf diagram.

Consequential amendment required to Paragraph 3.62.

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