

Comments

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

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| 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? Policy

Question 3b

Please state which Policy Number this representation relates to. WS 4.4

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.

Part 3 of the plan lacks a strategic policy for built heritage. There are single criteria in WS 1.2 (Employment) and WS 6 (Placemaking for Wirral) but it is mostly treated as detailed policy (WD 2) in

Part 6. Therefore Policy WS 4.4 should be enhanced to provide a stronger strategic framework for built heritage in the same way that Policy WS 5 provides a strategic policy for each element of green infrastructure such as ecology, geology and landscape.

The problems appears to stem from an inadequate evidence base which has two aspects. Firstly the Conservation Area Appraisals are mostly out-of-date and many lack Management Plans. Secondly, unlike with all the green infrastructure elements there is no expert analysis set out in an up-to-date commissioned technical report. In fact, the Wirral Heritage Strategy <https://democracy.wirral.gov.uk/ielIssueDetails.aspx?IId=16967&PlanId=0&Opt=3#A115178> has been dropped from the evidence base after the Issues and Options Report and no replacement prepared.

In the Issues and Options Report, with regard to heritage, under the heading 'What Our Evidence Tells Us' it stated:

8.114 Wirral's Heritage Strategy will set priorities for capital investment in heritage and heritage assets, to maximise educational, recreational, tourism and regeneration opportunities.

8.116 Flaybrick Cemetery and Port Sunlight have conservation area management plans dated 2018. Other conservation area appraisals and management plans date from 2007 and will need to be updated. New management plans will also need to be prepared for: Clifton Park, Hamilton Square, Lower Bebington, Meols Drive, Mountwood, the Kings Gap and the Magazines.

8.117 A wide variety of historic assets are undesignated can make an important contribution to Wirral's broader historic character. These features range widely in scope and in scale. Liverpool Museum considers undesignated historic assets to include "the vast majority of non-Scheduled archaeological remains, historic landscapes, buildings of local interest, artwork."

Our Preferred Approach

The Local Plan will set a positive strategy for the conservation and enjoyment of the Borough's heritage assets through the vision, objectives, broad spatial strategy, strategic priorities for settlement areas and policies for:

Achieving Sustainable Places;
Protection of Heritage Assets;
Each designated Conservation Area

This Issues & Options wording has unfortunately not found its way into the strategic policies of the Plan. As such, the resulting Plan does not reflect the advice in 'Historic Environment in Local Plans - Historic Environment Good Practice Advice in Planning: 1' (2015) which states sustainably managing the historic environment is best achieved by identifying clear strategic policies for heritage, in order to assist those preparing neighbourhood plans (para 14).

In terms of national policy for heritage, the NPPF sets out the need for Local Plans to be based on good evidence and strategic policies. Local Plans need to:

- be based on adequate, up-to-date and relevant evidence about their area (NPPF, Paragraph 31)
- contain strategic policies to make provision for the conservation and enhancement of the built and historic environment (NPPF, Paragraph 20)
- set out a positive strategy for the conservation and enjoyment of the historic environment, taking account of the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring and opportunities to draw on the contribution made by the historic environment to the character of a place (NPPF, Paragraph 190)

NPPG states that a plan's vision and objectives can be used to set out the types of place(s) which the plan aims to achieve, how this will contribute to the sustainable development of the area and how this translates into the expectations for development and investment, including design. Where a plan contains strategic policies, they can be used to set out these design expectations at a broad level –

for example in relation to the future character and role of town centres, areas requiring regeneration or suburban areas facing more incremental change. Strategic policies can also be used to set key design requirements for strategic site allocations and explain how future masterplanning and design work is expected to be taken forward for these sites (NPPG, Paragraph: 003 Reference ID: 26-003-20191001).

WORDING OF POLICY 4.4

The wording of this policy is very confusing.

The designation of Urban Tourism Areas (listed in Appendix 7) is supported in principle. In particular TLR-SA6.1 (Hoylake and Meols Waterfront). However, these are essentially linear movement corridors with little space for new development. Clause I is written as a permissive policy for all development and the use of the word 'adjacent' is imprecise.

Clause K encourages tourist development in urban coastal locations including Hoylake, which is supported in principle but the wording 'in the urban area outside the Primarily Residential Areas shown on the Policies Map' excludes almost all of the town. This should be rewritten and much greater clarity on where hotels and guest houses are expected to locate.

Paragraph 3.107 attempts to clarify what Clause K means but this isn't clear either. 'Clause K. of Policy WS 4.4 does not preclude the development of hotels and guest houses providing overnight accommodation, without facilities for non-resident in any suitable location including in Primarily Residential Areas'.

The view of the Forum is that visitor accommodation may be appropriate in Primarily Residential Areas and it should not have to all go into a Centre. The made and emerging NP is flexible on visitor accommodation.

Hoylake Vision's local engagement exercises over the past two years found that there was concern about the promenade itself being commercialised as it was valued for its quiet, natural character and appreciation of its wildlife. However, many respondents did express a need for a place for toilets and refreshments, in addition to those in Hoylake Parade Community Centre. There was a broad consensus on developing activities along the promenade, such as events and sports.

Paragraph 5.45 of plan recognises how Hoylake functions as a coastal resort and Paragraph 5.49 recognises that the facilities and open spaces associated with North Wirral Coastal Park and the coastal promenades at Hoylake and Meols, the Hilbre Islands, Red Rocks Nature Reserve, West Kirby Promenade and Marine Lake and the Wirral Way, are of strategic importance. However this does not translate into useful policies to accommodate sustainable tourism so as to boost the social and economic vitality of Hoylake.

In the Issues and Options Report, with regard to tourism and the visitor economy, there is much more in the way of strategic policies recognising the importance of sustainable tourism and commitments to targeted investment along the coastal communities.

6.59 Wirral has made significant progress in developing its visitor offer over the last 10 years. Wirral has built its reputation on quality and distinctiveness, receiving a wide range of awards for its beaches, green flag parks as well as its heritage and attractions. Wirral is part of England's Golf Coast, home to 14 golf courses including Royal Liverpool, host of The Open in 2006 and 2014....

6.60 The Wirral Visitor Economy Strategy 2017-2020 identifies a number of key priorities:

- Developing Wirral's tourism marketing strategy and positioning the peninsula as an outstanding destination;
- Generating greater benefit from conferences, business meetings and events;
- Developing Wirral's tourism assets and experiences to increase competitiveness
- and attract new visitor markets; and
- Encouraging sustainable and accessible tourism in Wirral.

6.62...In Wirral, a growth in sustainable tourism will be focused on the quality of the Borough's natural environment; built heritage; country parks; and coastline, with appropriate visitor facilities at Birkenhead, New Brighton, Leasowe, Hoylake, West Kirby, Thurstaston and along the Mersey coast, managed to avoid harm to European Sites and their supporting habitat.

6.63 Tourism investment will be targeted to support regeneration in Birkenhead; provide improvements within the coastal resorts of New Brighton, Hoylake and West Kirby and along the Mersey coastline; and to improve public access to the coast and countryside subject to the protection of European Sites and their supporting habitats.

Our Preferred Approach

A growth in sustainable tourism will be focused on the quality of the Borough's natural environment; built heritage; country parks; and coastline, with appropriate visitor facilities at Birkenhead, New Brighton, Leasowe, Hoylake, West Kirby, Thurstaston and along the Mersey coast, managed to avoid harm to European Sites and their supporting habitat.

Tourism investment will be targeted to support regeneration in Birkenhead; provide improvements within the coastal resorts of New Brighton, Hoylake and West Kirby and along the Mersey coastline (supported by the preparation of masterplans where appropriate); and to improve public access to the coast and countryside subject to the protection of European Sites and their supporting habitats

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.

The policy and supporting text needs to be completely rewritten to reflect the concerns above, using the wording from the Issues & Options report on how heritage and tourism are of strategic significance to Wirral.

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