

WGSA Opening Statement – Rule 6 party

Good morning. I'm Peter Black, advocate for Wirral Green Space Alliance (WGSA), the Rule 6 Party. In this opening statement I am going to introduce WGSA and our witnesses and outline our views on the key issues on which the appeals will be decided. In doing this, I will identify the distinctive contribution WGSA adds to this Inquiry apart from articulating the very real and considered opposition of local people and organisations.

Early in my career, I bought a house in the Wirral and spent five happy years living in Oxton with my cats, working on habitat surveys and ecology at Wirral Wildlife, and visiting Tranmere Rovers on Friday nights. I nearly bought a house in Port Sunlight, but eventually had to move for job opportunities. The imbalance of housing and employment is a theme we will return to, but in any case, it is a real pleasure to return to the Wirral.

So what is WGSA? Since 2018 it has represented over 30 local community, environmental, heritage, conservation, and nature groups, along with expert individuals and advisers. It is a genuine umbrella group that articulates agreed themes, avoids duplication, and provides expert advice to member groups. It holds both internal coordination and open Public Meetings (with several hundred attendees most times). It analyses and presents options and issues updates and newsletters.

It is a positive group committed to sustainable development. It has worked closely and constructively with politicians and officers to develop an advanced emerging Local Plan appropriate to the genuine needs of the Wirral for housing and employment.

WGSA is justly proud of the result – in five years, the Council has been on a journey. At the start the draft Local Plan proposed significant and damaging greenfield development that

would ensure that communities in the east of the Wirral such as Birkenhead and Wallasey remained 'left behind'. Now, Wirral has an advanced emerging local plan currently under examination which respects and makes the most of its character, communities, coastal zones and countryside, biodiversity, and cultural heritage.

The strategy is unequivocal. The eastern areas of the Wirral desperately need investment, jobs, and housing. Residents in the east have a 12 year lower life expectancy than those in the west of the Wirral. This cannot be ignored. Ample land exists with willing landowners to receive that development in the east.

The central and western areas, where the appeal sites are located, and where most new housing has been built in the last few decades, already has an imbalance with employment. This has led to substantial outward commuting. To allow the appeals would undermine both regeneration in the east, and also threaten internationally important habitats, plants and wildlife in the west.

In contrast to the local plan strategy, the appeal sites represent 'Cowpat Development'. This is the splodging of lumps of housing seemingly at random in the countryside. The so called 'Leverhulme Vision' is actually neither a vision nor connected to Leverhulme. It just covers land that a property company happens to own. The connection to an industrialist who developed housing near a soap factory and died a hundred years ago is obscure to say the least as our evidence will show. It would be a magical co-incidence that stretches the bounds of credulity if the best, and indeed the only sites suitable for development happened to be owned by a single property development company.

When we drafted this opening just a few days before the Inquiry it was still not clear if the SANG appeal was going to be abandoned. The SANG was initially presented, and indeed is

clearly intrinsically linked to the other applications – the Claire Coates presentation contains no fewer than 16 references. But withdrawn it was, with just three working days to assess the implications. This emphasises that these are simply speculative applications for residential development only, to be built by national volume housebuilders with no real thoughts of creating balanced, accessible, or inclusive communities.

We are going to call three witnesses. Firstly.

John Heath - a local resident, and a former architect who coordinates WGSA. He will give evidence on the group and its engagement with the local plan process. He was co-owner and Partner of the largest Architectural and Design Services firm in the NW, leading projects up to hundreds of millions of pounds value and has acted previously as an Expert Witness.

Jackie Copley - a chartered planner with 30 years' experience. She brings particular expertise on regeneration, brownfield development and Green Belt policy. For the past decade she has worked for the CPRE. Although her evidence is independent of CPRE, she brings an understanding of their research on brownfield development that is unmatched.

Prof David Gregg - an expert in mathematical modelling and forecasting research, with professional experience spanning five decades at director-level. and responsible for large research teams advising international companies on global operations. He has provided evidence to the current local plan examination and will talk about the inaccurate calculation of the local housing need. His work includes applying real world data to the standard method. His work and findings have the backing of the OSR (Office of Statistics Regulation), and the renowned demographer Prof Ludi Simpson.

We do not think housing need should be a matter for this inquiry, but the appellant has provided evidence which we feel need to be countered. National guidance both NPPF and

recent Ministerial statements highlight the option of diverting from the standard approach if evidenced and justified.

Dr Hilary Ash is a professional ecologist who has practiced and lived on the Wirral over many decades.

What are the main issues?

Although this inquiry now has over 500 documents, at its heart this is a simple appeal. The issues of principle are clear. There is unanimous agreement that Appeals A-G represent inappropriate development in the Green Belt. So what else?

- Firstly, the proposed developments would clearly undermine the local plan process.

A local authority, in tune with and with the consent of its local community (confirmed by the all-out election results less than two weeks ago) has evolved and agreed a strategy. The arguments are currently being examined, so the local plan is obviously in an advanced stage. It should not be the role of this Inquiry to effectively re-allocate large chunks of current Green Belt for residential development and make the brownfield land first strategy of the emerging plan impossible to implement. This would drain investment from areas that desperately need it, into suburban housing in mid-Wirral. The Wirral is a constrained peninsular and a single housing market. The issue of brownfield against Green Belt development is self-evidently central to the emerging local plan strategy. To claim the local plan is not at an advanced stage is just wrong. The 'high hurdle' has been easily cleared. To suggest that the appeal sites are somehow in line with the ELP requires breath-taking acts of linguistic contortion.

To reiterate, national policy, is that Green Belt boundaries should only be reviewed as part of local plan making. These appeals, collectively for nearly 800 houses on seven Green Belt sites constitute a significant alteration of Green Belt boundaries.

- Secondly housing land supply. If there is no need for additional housing land, there can be no Very Special Circumstances. And there is an adequate supply. The Council has met the Government's Housing Delivery Test, achieving 99% of completions against target and is not subject to any sanctions. This indicates that the Government is content with the performance of the Council. It is significant that neighbouring authorities in the Merseyside housing market have exceeded their targets and are competing for the same residents.

We have forensically assessed the technical evidence on housing land supply and support the Council's view that there is no need to release Green Belt land. In addition, we have identified sites that were missed off the Brownfield Register. We will provide evidence on the recycling of brownfield land to show there is a significant surplus land supply across the Wirral, that more brownfield land will be generated and that the housing need is overstated.

Either of these main issues (prematurity and housing land supply), on its own, is sufficient to dismiss these appeals, which is why I have concentrated on them. But there is more.

The harms arising to Green Belt purpose and openness are important. Combined with the other harms arising, such as to ecology, the rural character and local heritage, unnecessary loss of productive farmland, unresolved flood risk and absence of genuine sustainable travel

options the harms become overwhelming. The proposed mitigations and compensations do not adequately address these harms.

The Leverhulme Estates 'vision' and 'site masterplans' were progressed by a single property company without involvement from the community, local authority, or other stakeholders, and they are highly controversial with a lack of local support. They are strongly objected to, by a wide range of interests, including 25,000 people who signed a petition against them. Had the appellant engaged with others we might be considering more appropriate, more sustainable proposals. But they didn't. And we aren't.

In conclusion, these are poor plans which foist unsustainable, car-dominated development provided by national volume housebuilders on an area where they will cause demonstrable harm, including undermining a carefully considered and advanced emerging local plan strategy.

The appeals should be dismissed.

Peter Black, for Rule 6 party.