

## Policy CS2 – Broad Spatial Strategy

Summary of Comments Received	Recommended Response
Support the emphasis on urban regeneration and east Wirral, but paragraph 1 of Policy CS2 should be reworded to read: “The Local Planning Authority will pursue a strategy of urban regeneration, <u>economic growth</u> and environmental enhancement...”	Accepted. It is recommended that paragraph 1 of Policy CS2 is amended to read: “The Local Planning Authority will pursue a strategy of urban regeneration, <u>economic growth</u> and environmental enhancement...”
Policy CS2 would benefit from a clearer description of the 'older urban areas'.	Accepted. It is recommended that Policy CS2 is amended to read: “The older urban areas in east Wirral, <u>previously designated as part of the NewHeartlands Pathfinder...</u> ”, to reflect the terminology already used in the Spatial Vision.
Policy CS2 should be supported by a detailed plan identifying areas of greatest need and how they have been defined. The boundaries should take more account of existing land uses where boundaries of development sites are not wholly within an area of greatest need.	No change is recommended. Areas of greatest need are defined in the Glossary as geographical areas falling within the lowest 20% of scores within the national index of multiple deprivation for England, which is a robust and well-established basis for highlighting areas where regeneration needs to be prioritised. Further information, including detailed mapping, is set out within the accompanying Spatial Portrait. The position of individual sites will need to be considered on a case by case basis, as proposals are brought forward for consideration.
Paragraph 2 of Policy CS2 should be reworded to read: “The <u>Council's</u> priority will be to <u>deliver the mixed use development of the Wirral Waters Strategic Location, providing a focus for job, housing and population growth and reflecting a strategy of marrying opportunity with need. More widely development will be directed to other</u> areas of greatest need of physical, social, economic and environmental regeneration, particularly within the <u>established</u> urban areas of east Wirral.”	Paragraph 2 of Policy CS2 currently states that “The first priority will be to focus job, housing and population growth to areas of greatest need of physical, social, economic and environmental regeneration, particularly within the older urban areas of east Wirral.” The proposed wording would dilute the commitment to all areas of greatest need and to the older urban areas, of which Wirral Waters forms part. Explicit support for Wirral Waters is included within Policy CS12 – Wirral Waters. It is therefore recommended that paragraph 2 of Policy CS2 is only amended to read: “The <u>priority</u> will be to...”
Development outside the priority areas should be restricted to that which fulfils an evidenced local need.	No change is recommended, as the national presumption in favour of sustainable development would no longer permit a restrictive approach to be applied, unless specific policies in the National Planning Policy Framework indicate that development should be restricted (NPPF, paragraph 14 and footnote 9).

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The reference to medium to high density development within areas of greatest need is too prescriptive and does not reflect the national requirement to achieve viable mixed-use developments. Densities should have regard to locational characteristics and should not be pre-determined by the Council.	No change is recommended, as Policy CS2 only states that “medium to higher density development will normally be permitted”, rather than required and the emphasis is on making “a positive contribution to local character and amenity”.
Paragraph 5 of Policy CS2 is inflexible and predetermines and protection of existing employment sites at Moreton without any robust assessment of their economic, viability and deliverability. Employment sites should not be protected where there is no reasonable prospect of the site being used for that purpose. The Wirral Employment Sites and Premises Study has not assessed every site that might be available.	No change is recommended. Policy CS2 is not site specific. The Wirral Employment Sites and Premises Study included a general assessment of the likely continued attractiveness, suitability and viability of all the Borough’s existing employment areas and a selection of available sites within them to identify an Employment Area Hierarchy. Policy CS17 provides for site-specific assessments where evidence relating to need, marketing, land supply and land use and the character of the surrounding area can be provided.
Paragraph 5 of Policy CS2 should read: “The primary focus for new jobs to <u>drive forward</u> the economic <u>transformation</u> of the Borough <u>and support the economic transformation of the City Region</u> will be the <u>Wirral Waters Strategic Location (part of the wider Mersey Waters Enterprise Zone)</u> . <u>Other priority areas for new jobs will be...</u> ” as the primary focus for new jobs should be at Wirral Waters rather than just the Mersey Waters Enterprise Zone.	The proposed wording would delete the focus on areas outside Wirral Waters. It is therefore recommended to amend paragraph 5 of Policy CS2 to read: “The primary focus for new jobs to <u>drive forward</u> the economic <u>transformation</u> of the Borough <u>and support the economic competitiveness of the Liverpool City Region</u> will be <u>Wirral Waters</u> , the <u>Mersey Waters Enterprise Zone</u> and...”
Paragraph 5 of Policy CS2 should not identify the existing employment area at Upton, which is already developed. Whilst there is the opportunity to encourage new businesses and enterprises within existing premises, there is no realistic prospect of redevelopment within the plan period.	No change is recommended. Policy CS2 is not site specific. The Wirral Employment Sites and Premises Study included a general assessment of the likely continued attractiveness, suitability and viability of all the Borough’s existing employment areas and a selection of available sites within them to identify an Employment Area Hierarchy. Policy CS17 provides for site-specific assessments where evidence relating to need, marketing, land supply and land use and the character of the surrounding area can be provided.
Paragraph 6 of Policy CS2 should be amended to read: “Port and marine-related facilities will continue to be promoted at Twelve Quays, West Float, Cammell Lairds and at the Manchester Ship Canal at Eastham ( <u>including Port Wirral/QEII Dock</u> ) to reflect their continued strategic importance...”, to ensure that both component parts of Eastham are included.	Accepted but simplified wording is recommended to read: “Port and marine-related facilities will continue to be promoted at Twelve Quays, West Float, Cammell Lairds and at the <u>Eastham Dock Estate</u> to reflect their continued strategic importance...” supported by amended text in the Glossary to refer to the Manchester Ship Canal, Port Wirral and the QEII Dock.

## Policy CS2 – Broad Spatial Strategy

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Policy CS2 should confirm that Birkenhead Town Centre is the borough-wide focus for comparison retailing provision.	No change is recommended, as Policy CS25 – Hierarchy of Retail Centres, already identifies Birkenhead Town Centre as the sub regional centre and as ‘the Borough’s main comparison shopping destination’. It is however recommended, for the avoidance of doubt, that Policy CS25 is amended to read: “Birkenhead Town Centre (including Grange Road West, Oxton Road, <u>Europa Boulevard</u> , <u>Argyle Street</u> , <u>Market Street</u> and <u>Hamilton Street</u> )”
Policy CS2 should be revised to read 'Borough-wide <u>comparison retail and leisure</u> facilities and services will first be directed to the most accessible locations in and around Birkenhead Town Centre. Secondary and district-level facilities and services operating over a more local catchment will first be directed to the larger existing <u>town</u> centres of Heswall, Liscard, Moreton and West Kirby; <u>and the district centres</u> of Bromborough Village, Hoylake and Prenton (Woodchurch Road). <u>If no suitable sites are available within the defined centres then accessible edge of centre sites and thereafter out of centre sites will be considered against the sequential approach</u> '.	The suggested additional wording is excessively detailed and would duplicate Core Strategy Policies CS25-CS29. It is however, recommended that paragraph 7 is amended, for the avoidance of doubt, to read: "Secondary and district-level facilities and services will first be directed to the <u>town and district</u> centres of Bromborough Village, Heswall, Hoylake, Liscard, Moreton, Prenton (Woodchurch Road) and West Kirby and then to other accessible sites that will be well-served by public transport".
A reference to "other biodiversity assets" should be added to paragraph 8 of Policy CS2.	Accepted. It is recommended that paragraph 8 of Policy CS2 is amended to read: "...subject to the protection of European sites, their supporting habitats <u>and other biodiversity assets</u> ."
A reference to "geodiversity" should be added to the list in paragraph 10 of Policy CS2.	Agreed. It is recommended that paragraph 10 of Policy CS2 is amended to read "...visual impact, biodiversity, <u>geodiversity</u> , landscape and heritage;"
The reference to the 'core of the conurbation' in paragraph 6.2 needs further explanation, with reference to the defined Settlement Areas.	No change is recommended, as paragraph 2.10 and reference to the older urban areas in east Wirral present a clear indication of what is meant by the 'core of the conurbation'.
The reference to a 400m easy walking distance is inconsistent with retail practice guidance which specifies a 300m distance (referred to at paragraph 21.33 of the Core Strategy) for sequential purposes. The 300 metre threshold should be adopted for consistency.	No change is recommended, as the distances quoted are intended to fulfill two different purposes. The National Planning Policy Framework glossary uses 300m to justify the location of retail and town centre uses for the purposes of national policy, while paragraph 3 of Policy CS2 uses 400m to justify the location of medium to higher density housing development to promote a sustainable pattern of development.

## Policy CS2 – Broad Spatial Strategy

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Urban extensions in Green Belt locations within easy walking distance of existing centres or public transport corridors can also achieve sustainable development.	No change is recommended, as no urban extensions in the Green Belt are being promoted in the Core Strategy and the provisions in Policy CS2 would, in any case, continue to apply to appropriate proposals under Policy CS20 – Housing Contingencies.
The housing industry has moved away from higher density development, especially as there is now a lack of finance for apartments for both lenders and borrowers. It is reasonable to assume that this trend will continue well into the plan period, with family housing predominating at a density of circa 30 dwellings per hectare.	No change is recommended, as Policy CS2 is intended to permit but not require higher density development in certain locations, to promote a more sustainable pattern of development.
Generally support of the overall spatial strategy. A ongoing study of the M56 / M53 corridors with data provided by Wirral Council, should determine the likely level of impact and any measures which would be required to ensure that new development within Wirral can be sustainably delivered without detriment to the operation and safety of the Strategic Route Network.	No change is recommended, at this stage, subject to the findings of this Study.
A mix of both focused regeneration and balanced growth to create a more sustainable and flexible pattern of development is supported but development should not just be focused on areas of greatest need in the older eastern parts of the Wirral. The reference to urban sites in paragraph 3 of Policy CS3 should also include urban extensions in the Green Belt, to ensure that development is more equally spread throughout the Borough on well-located sites.	No change is recommended, as no urban extensions are being promoted within the Core Strategy.
The focus on Wirral Waters and Birkenhead is flawed and will deter investment in other logical sustainable locations.	No change in recommended, as Policy CS2 seeks to pursue a strategy of urban regeneration and environmental enhancement, to ensure that full and effective use is made of land throughout the Borough's existing urban areas.
Policy CS2 does not promote a strategy which will address the full identified needs set out within the Councils own evidence base and fails to promote a Green Belt review which is considered necessary to meet those needs.	No change in recommended, at this stage. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing requirements. The approach to the delivery of new housing development, in the event that insufficient sites come forward within the urban area, will currently be governed by Policy CS19 - Housing Implementation Plan and CS20 - Housing Contingencies.

## Policy CS2 – Broad Spatial Strategy

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There is no evidence that development outside an easy walking distance of 400m will be unsustainable or will not be required to meet identified housing needs. This test should also be applied in areas of greatest need.	No change is recommended, as Policy CS2 does not rule out development in other locations but seeks to focus higher density development towards the most sustainable locations.
The definition of areas of greatest need is neither precise nor immediately discernible from Policy CS2 or the Key Diagram.	No change is recommended, as areas of greatest need are defined in the glossary as geographical areas falling within the lowest 20% of scores within the national index of multiple deprivation for England which is a robust and well-established basis for highlighting areas where regeneration needs to be prioritised, shown on the Key Diagram and supported by more detailed mapping within the accompanying Spatial Portrait.
Policy CS2 fails to address the range of needs which exist and how the delivery of housing will impact upon the regeneration aspirations set out in the supporting text and introductory chapters. Policy CS2 assumes that development in identified priority areas is sustainable by default.	The evidence contained in the forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need. The identification of and emphasis on priority areas is the result of previous consultation and sustainability appraisal, which demonstrated a high level of support for focused regeneration.
Policy CS2 fails to address the significant delivery issues associated with the regeneration agenda.	No change is recommended, at this stage. Delivery has already been addressed as part of the Council's Strategic Housing Land Availability Assessment and the wider viability of the Core Strategy will now be addressed in the forthcoming Core Strategy Viability Study.
The Local Plan should be fully interlinked with the relevant Local Transport Plan (LTP3) and provide for the integration of land use and transport planning. The location of housing and employment development sites should be focused around rail stations and along existing rail or bus corridors as the first priority. Any extension of development into the Green Belt, should only occur where good public transport and other sustainable modes exists, or can be readily and easily achieved.	No change is recommended, as Policy CS2 already reflects a focus on public transport corridors. Linkages to the Local Transport Plan have been secured through the emerging Core Strategy Infrastructure Plan and will be applied through Policy CS40 – Transport Requirements, Policy CS41 – Transport Schemes and Policy CS45 – Developer Contributions.
Welcome the intention to strengthen and enhance Wirral's distinctive environment, which should be followed through with the addition of the word "environment" in the sentences in the second and third paragraphs which read "and will be expected to make a positive contribution to local character and amenity..."	Accepted. It is recommended that paragraphs 2 and 3 of Policy CS2 are amended to read "...and will be expected to make a positive contribution to local character, <u>environment</u> and amenity;"

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Restricting development outside the regeneration priority areas to only 'urban sites' could stifle development in sustainable locations which relate well to existing centres and residential areas. It is inevitable that some appropriate Green Belt sites will need to be released.	No change is recommended, at this stage. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need. The approach to the delivery of new housing development, in the event that insufficient sites come forward within the urban area, will be governed by Policy CS19 – Housing Implementation Plan and Policy CS20 – Housing Contingencies.
The promotion of port and marine-related facilities at Twelve Quays, West Float, Cammell Lairds and Eastham, to maximise the potential for off-road transport by rail and water, will require stronger, more detailed policy support to secure delivery.	No change is recommended, as amendments recommended to the Spatial Vision will now refer to sustainable freight transport and Policy CS16 – Criteria for Port-Related Development already specifically supports the more efficient use of rail and water transport in the locations identified.
The presumption in favour of Sustainable development cannot be followed without implementing an overall mitigation strategy. The need for a mitigation strategy, recognised in paragraph 22.7 of the Core Strategy, should be included in a Core Strategy policy. The following text should therefore be included in Policy CS2: " <u>Mitigation for recreational disturbance to Natura 2000 sites, which may involve a mix of access management, habitat management and provision of alternative recreational space will be provided through a Mitigation Strategy. Provision of alternative recreational space, will be identified in the site-specific Local Plan that will follow the adoption of this Core Strategy, in consultation with the other adjoining Local Authorities, Natural England and other partners whilst access and habitat management and monitoring of the strategy will be funded through (CIL?) the need for which will be regarded as critical in the Infrastructure Delivery Plan.</u> " Reference to the Green Infrastructure Strategy, based on the Liverpool Green Infrastructure Framework, which should form an essential part of any mitigation strategy, should also be included in the accompanying text, as a satisfactory conclusion to the Habitat Regulations Assessment.	Accepted but simplified wording is recommended to amend Policy CS2 to read: " <u>Mitigation for recreational disturbance to Natura 2000 sites, which may involve a mix of access management, habitat management and provision of alternative recreational space, will be provided through a Mitigation Strategy. Provision of alternative recreational space will be identified in a site-specific Local Plan, in consultation with relevant partners.</u> " It is also recommended that paragraph 6.9 is amended to read: " <u>Access and habitat management and monitoring required as a part of a Mitigation Strategy for impacts on European Sites will be funded through the mechanisms identified in Policy CS45 – Developer Contributions and guided, where appropriate, by a Green Infrastructure Strategy.</u> "

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<p>Policy CS2 should be amended to recognise the need for a balance between focused regeneration and urban expansion to meet identified housing need based on up-to-date population projections. The Councils current approach is based on the out-of-date Regional Spatial Strategy. Paragraph 9 of Policy CS2 should be amended to refer to the need for further growth in the rural area and in urban/rural locations and say: <u>'Where appropriate and in accordance with national Green Belt policies this should include the sensitive release of Green Belt land to meet its future housing requirement.'</u> The Core Strategy should be informed by a more reliable and up-to-date evidence base, confirm the requirement for a full Green Belt review or recognise the potential need for greenfield development outside the urban area rather than rely on a contingency policy.</p>	<p>No change is recommended, at this stage. The forthcoming Strategic Housing Market Assessment will provide an up-to-date assessment and will determine the Council's position in relation to future housing need.</p>
<p>Policy CS2 demonstrates an over-dependency on development in east Wirral, to the detriment of other areas and the future sustainability of the whole Borough. This uneven distribution will not meet market demand or the need for specialist and affordable housing in the western parts of Wirral and will hinder the delivery of sustainable mixed communities. The strategic, well-planned expansion of other towns will secure their sustainability and role as centres for local employment, retail and other facilities. Policy CS2 does not provide enough flexibility to respond to changing circumstances, in the event that Wirral Waters does not come forward as envisaged.</p>	<p>No change is recommended, as Policy CS2 does not rule out development in other locations. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need. The approach to the delivery of new housing development, in the event that insufficient sites come forward within the urban area, will currently be governed by Policy CS19 - Housing Implementation Plan and Policy CS20 - Housing Contingencies.</p>
<p>Policy CS2 should address the need for a strategic review of the Green Belt now, to provide for growth rather than rely on a vague and uncertain contingency policy (Policy CS20).</p>	<p>No change is recommended at this stage, until the forthcoming Strategic Housing Market Assessment is completed.</p>
<p>Biodiversity is poorly supported in Policy CS2.</p>	<p>No change is recommended, as paragraph 10 of Policy CS2 already states that development should 'preserve and enhance local character and distinctiveness, including visual amenity, biodiversity landscape and heritage...' and '...provide/ and or contribute to a local network of green infrastructure...' and it has already been recommended that additional wording is added to refer to European Sites.</p>

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The wording of paragraph 8 of Policy CS2 is inconsistent with the Spatial Vision, in terms of the provision of visitor facilities at tourism attractions and references to Thurstaston.	Accepted but a general reference to the provision of visitor facilities rather than a specific reference to Thurstaston is recommended. It is therefore recommended that paragraph 8 of Policy CS2 is amended to read: "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; <u>to enable the provision of appropriate visitor facilities</u> ; and to improve public access to the coast and countryside subject to the protection of European Sites and their supporting habitats".