

Policy CS3 – Green Belt

Summary of Comments Received	Recommended Response
Policy CS3 should be changed to say “ <u>The general extent of the</u> Green Belt will be maintained in Wirral...” to allow for minor changes to address boundary anomalies where appropriate, such as at three sites in Eastham at Ferry Road and Seaview Avenue.	No change is recommended, as the suggested wording introduces ambiguity and would be inconsistent with the National Planning Policy Framework, which states that “...the essential characteristics of Green Belts are their openness and their permanence...” and that “...once established, Green Belt boundaries should only be altered in exceptional circumstances...” (NPPF, paragraphs 79 and 83 refer) and Regional Spatial Strategy Policy RDF4 has now been revoked. Site specific issues will only be considered if a review of the Green Belt is considered to be necessary, following the completion of the forthcoming Strategic Housing Market Assessment.
Paragraph 2 of Policy CS3 should be amended to read " inappropriate development as defined in national policy, will not be approved except in very special circumstances, <u>where</u> the potential harm to the Green Belt is clearly outweighed by other considerations", (not "unless"), as the "very special circumstances" must exceed the harm to the Green Belt.	Accepted. It is recommended that Paragraph 2 of Policy CS2 is amended to read "...inappropriate development, as defined in national policy, will <u>only</u> be approved in very special circumstances, <u>where</u> the potential harm to the Green Belt is clearly outweighed by other considerations."
The list of exceptions in paragraph 6.13 should include "ones to aid the conservation or interpretation of biodiversity".	No change is recommended, as the text reflects the list of exceptions set out in the National Planning Policy Framework.
Policy CS3 needs to allow for a review of Green Belt boundaries to deliver the housing needed over the plan period as the Core Strategy has failed to demonstrate that housing needs can realistically be delivered without a Green Belt review.	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.
In light of the Council's current inability to demonstrate a 5 year supply of housing land and the need to find additional deliverable sites, an adjustment to the Green Belt boundary is required immediately.	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.
Established in 1983 and last reviewed (extended) in 2000 (during a time of housing restraint), Policy CS3 is flawed and assumes housing targets will be delivered. The Council should take note of the National Planning Policy Framework and review the boundaries across Wirral as a matter of urgency.	No change is recommended. The position in relation to the Green Belt is clearly articulated in Policy CS3. 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.

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Policy CS3 fails to take into account the need to undertake a Green Belt review to meet development needs both within and beyond the current plan period. The Council's conclusion that it does not need to undertake a Green Belt review is not based upon robust evidence on the deliverability within the Strategic Housing Land Availability Assessment or the full objectively assessed needs identified in the existing Strategic Housing Market Assessment.	The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need.
Policy CS3 does not address the national policy exception of limited infill development in villages and limited affordable housing for local community needs (NPPF Paragraph 80).	No change is recommended, as paragraph 3 of Policy CS3 already states that "Appropriate uses...will be permitted where they retain the openness of the Green Belt, retain and enhance landscapes, visual amenity and biodiversity and meet the priorities set out in Policy CS11..." and the exceptions referred to are specifically mentioned in paragraph 6.13 and paragraph 6.14.
It is essential that a strong Green Belt policy is adopted and that Green Belt boundaries are not weakened, if investment in areas of greatest need is to be delivered.	No change is recommended.
The Council cannot yet conclude that additional housing development is not required within the Green Belt. 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 need for sensitive Green Belt within Policy CS3, rather than rely on a contingency policy.	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.
Agree that a Green Belt should be maintained to assist in urban regeneration and to prevent urban sprawl but a Green Belt review needs to be undertaken before the Core Strategy is submitted to the Secretary of State, based on concerns over the ability to deliver housing and employment.	The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need. Policy CS13 – Employment Land Requirements and Table 19.1 – Employment Land Supply, indicates that the supply of employment land is likely to be sufficient to meet needs throughout the plan period.
Agree that the Green Belt is key in Wirral but concerned at the creeping development through the reuse of unused Green Belt properties that seem to have been built with the footprint of a house.	No change is recommended, as the replacement, extension and alteration of existing buildings and the re-use of previously developed sites is allowed under the National Planning Policy Framework.

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Not all land that is currently designated as Green Belt in Wirral serves all the purposes of the Green Belt listed in paragraph 80 of the National Planning Policy Framework, including sites where development would form a natural 'rounding off' to a settlement and would lead to no greater incursion into open land than the current limits of the settlement. It is not realistic to expect the Borough's dwelling targets to be met wholly within the existing urban areas.	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.
As Wirral Waters is unlikely to deliver the expected number of dwellings in the five year period to 2018, the Council should look to review the Green Belt now and safeguard land through the Core Strategy, rather than through a later site allocations process.	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.