

**Critical Appraisal of the Hoylake Vision
Neighbourhood Development Plan 2015 -2020
Submission Draft 18 September 2015**

By Jackie Copley, MA, MRTPI

This document has been commissioned by CPRE Wirral
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Personal Biography

1. Jackie Copley has been a Chartered Member of the Royal Town Planning Institute since the year 2000. She has the following qualifications: MA in Town & Regional Planning from the Leeds Metropolitan University; a BA (Hons) in Town & Country Planning from The University of Manchester, and a Postgraduate Certificate in Urban Design from The University of Salford.
2. Jackie has worked as a professional town and country planner since 1995. Her first roles were for regeneration partnerships in both Manchester & Salford. She was responsible for a variety of economic, social and environmental projects in her respective roles. She also delivered a European Union funded project that linked businesses throughout Greater Manchester with the higher education institutions via work based placements and research projects.
3. From 2002 to 2010, Jackie worked in private planning consultancy for Roger Tym & Partners (now Peter Brett Associates) and Atkins (Europe's largest environmental and engineering company). She completed evaluation studies and compiled employment and housing evidence bases for local development frameworks. Jackie also undertook some independent consultancy commissions with Envision.
4. More recently, Jackie has worked for the Lancashire Branch of the Campaign to Protect Rural England as its Planning Manager. She has been involved in a wide range of rural planning work, including shale gas, hazardous waste, transport master planning, local plan making, regional planning, neighbourhood planning and development control. Jackie has completed a number of studies relating to Green Belt designation. Jackie has made representations at local plan examinations and appeared as an expert witness at planning appeals. She has regularly worked in partnership with other environmental organisations.

The Campaign to Protect Rural England (CPRE)

5. CPRE believes that a beautiful, thriving countryside is important for everyone, no matter where they live. The threat of development is never far from rural places, particularly of land at the urban fringe. We understand very well that, our response cannot be to oppose everything.
6. We do firmly believe that good town and country planning principles ought to be applied to ensure the right types of development in the right places and for the right reasons, and importantly with the right supporting infrastructure.

7. Enough land to meet development requirements should be planned, but crucially it must be 'properly evidenced as needed', and development should be built on previously used land in preference to farmland. We therefore respond to proposals in one of three ways:
 - Encourage and support best practice and sustainable projects;
 - Recommend improvements which make proposals better and acceptable; and
 - Oppose that which is damaging and unacceptable.
8. Our charity owns no land, has no vested interests, relies solely on donations and grants, and is politically independent.
9. Sustainability, which is the key thread of the NPPF, must be based on making best use of existing resources. Greenfield land is not a unlimited resource that can be allocated for development
10. We support neighbourhood planning on the basis it is more probable that if local communities articulate their aspirations, then developments brought forward will be accepted by them and will better protect best loved rural and urban places maintaining a sense of place and distinctiveness.

Scope of this document

11. CPRE Wirral is supportive of the adoption of a Neighbourhood Plan to provide the third tier of planning policy protection to steer development to the most sustainable locations of Hoylake and to ensure it remains a place that people wish to live and visit. Importantly the Neighbourhood Plan must include:
 - a defined area that is a suitable geography and appropriate forum;
 - an accurate and representative evidence base;
 - a widely accepted underpinning vision;
 - priorities and policies based on aims and objectives evidenced as needed;
 - engagement and consensus during its formulation from local stakeholders and residents;
 - an independent examination;
 - consensus via a local referendum and subsequent order to bring it into force.
12. It is with these important seven elements in mind that CPRE Wirral commissioned this critical appraisal. Therefore the purpose of this report, is to query the relevance and appropriateness of the key elements of the Neighbourhood Plan.

Background

13. Neighbourhood Plans were introduced by the Localism Act 2011. They must be in general conformity with the National Planning Policy Framework, March 2012 (NPPF) and the local authority's Local Plan documents in so far as they are consistent with the NPPF. The Council has two existing adopted local plan documents:
 - Unitary Development Plan for Wirral (February 2000); and,
 - Joint Waste Local Plan for Merseyside and Halton (July 2013).
14. The strategic policies in the Unitary Development Plan will be replaced by a new Wirral Local Plan. The Local Plan has progressed to the drafting of the Revised Proposed Submission Draft,

which is due to be published for public comment in early 2016, when the evidence on housing and economic need has been completed.

15. The Neighbourhood Plan 2015-2020 must dovetail with the national and local planning policies, but it must express what is important and distinct about Hoylake and set out a vision that will build on the strengths and make good any deficiencies. Local Wildlife Areas as well as natural habitat protected by National and International legislation should be protected. Also local green space that provides for community gatherings, visitor attractions, recreation, and should be identified. Is there potential to register Village Greens, Common Land or a Nature Improvement Areas for example?
16. Future planning problems such as traffic congestion, insufficient affordable housing and flood risk ought to be identified and addressed. Essential new needed development will need to cover the costs of associated additional infrastructure, such as additional public transport services or water pumping stations, via identified development contributions achieved through Community Infrastructure Levy, and, where appropriate, Section 106 Agreements.
17. The environment lacks real attention in the Neighbourhood Plan despite the fact the half the area is characterised as being rural and protected by Green Belt. This underlines that the rural area has little connection with Hoylake and should therefore be excluded from the Hoylake Neighbourhood Plan.
18. The Neighbourhood Plan does not refer to the Climate Change Act 2008 at all. This is a significant omission. All new planning policies ought to enable 'sustainable' development. Energy demand must be reduced in the future to reduce greenhouse gases. Waste landfill must be reduced via the waste hierarchy of reuse and recycling in advance of landfilling. Everyone has a duty to make decisions that protect the resources for future generations and tackle climate change.
19. Furthermore there is no reference to improving air quality, protecting and enhancing tranquillity, no mention of protecting and replenishing mature trees, or hedgerows that contribute significantly to habitat and wildlife and flora.
20. A seventh theme to protect and enhance Hoylake's natural assets ought to be the starting point for the Neighbourhood Plan as this is a key attraction for people remaining and moving into the area. It offers immense residential amenity and keeps people fit and healthy by offering walking and cycling opportunities on the doorstep.

Neighbourhood Plan Themes

21. The identified themes of the Neighbourhood Plan ought to be:
 1. *Protect and enhance Hoylake's Natural Assets*
 2. Improving the Town Centre
 3. The Promenade and Recreation
 4. Getting around Hoylake
 5. Special Buildings and Places
 6. Homes in Hoylake

7. Enhancing the Carr Lane Industrial Estate

- 22. It is good that Hoylake Vision wants to be a good neighbour, which is important under the NPPF Duty to Cooperate requirements.
- 23. The Neighbourhood Plan has no statutory authority to alter the Wirral Green Belt boundary. This can happen only as part of a Strategic Green Belt Review as part of the Wirral Local Plan making process. Landscaping works that do not adversely impact on the openness of the Green Belt area are acceptable.
- 24. Concern is however expressed at the potential adverse impact on the five important Green Belt purposes if the proposal for a new resort golf course and 'enabling development' of a new road and major housing development. Further details are below.
- 25. The protection of Natura 2000 sites is important and is required by European legislation. As mentioned above, the lack of a map showing the Natura 2000 and other protected sites is worrying and we recommend that one is provided, even if the rural areas are to be excluded from the Neighbourhood Plan. As stated above, key theme for the local community must be to look after nature and facilitate its conservation and access by the public. The Neighbourhood Plan should as a minimum seek to protect and enhance these very special sites.

Hoylake Today and Tomorrow

- 26. The summary of Hoylake Today and Tomorrow is rather subjective in nature. It lacks robustness. The section would benefit immensely from inclusion of factual data to back up a number of statements, which without such data are unclear, difficult to understand, and lack rigor.
- 27. An average household annual income is stated as £35,608, but it is not clear whether this refers to a specific year (in which case which year) or whether it is the mean for a longer period. Dear prospective, it would be helpful to know how this figure compares with those for the rest of Wirral, Merseyside and national averages. It would be helpful to know the percentage of population in the Acorn geo-demographic population groups. It would be helpful to express the average household income as a percentage of the average house price to better show the affordability issues.
- 28. The Hoylake Neighbourhood Plan covers approximately one third of the local population of the two neighbouring townships of Meols and, West Kirby. The summary bullet points on page 7 would again be better understood if the background data tables could be viewed, either as an appendix or as a separate evidence base document.

Theme 1: Improving the Town Centre

- 29. It may be true that Hoylake is vibrant but further economic data is required to back up this claim. How many VAT registrations, businesses going into administration, and new starts in the last decade?

30. There are a lot of charity shops, betting shops and A1 type food take-away shops and this can imply that the trade has radically diminished over the years due to changing retail patterns, e.g. internet shopping and the trend for out of town retail. Retail data can give a real insight into what the retail changes have been over a period of time.
31. It would be helpful to understand the crime and community safety issues, relating to the rural area, and impact, if any, on farming.
32. It is a boost to the economy to have an occasional sporting event, but the frequency is not sufficient to keep those businesses that may benefit such as local hotels, restaurants, cafes busy each year, all year round.
33. On our area visit we noted the streetscape and public realm improvements which do make the area look smarter. These tend to be focused at the western end of the district centre. Public realm investments can make a place more attractive, but must maintain accessibility for all including elderly and wheelchairs/pushchair users.
34. Shop security shutters can make an area look bleak and in decline, especially at night time, but there are innovative ways of overcoming this problem through 'Designing out Crime' ¹solutions.

Theme 2: The Promenade and Recreation

35. The medium to long term aim of enhancing the promenade is laudable. However, care should be taken not to overlook the high level of existing users. In fact some research to understand the current usage may be beneficial.
36. The International Sand Yachting status is relevant (see photo below). During the site visit there were a large number of people walking on the promenade and beach, including bird-watchers, and dog walkers. It is likely that the coastal area is already frequently used, on a daily and/or several times a week basis. Currently there is little amenity in terms of café or shops, and the promenade is at a short walking distance to the main district centre.

Photos: Sand carting and dog walking are very popular on the Hoylake Beach



¹ <http://www.designcouncil.org.uk/resources/case-study/design-out-crime>

37. The map indicates that Hoylake extends a spur into Meols at the northern end to capture the recreational facilities next to the new life boat station.
38. As mentioned above it is a mini-boost to the economy to have an occasional sporting event, but a reality check may need to be applied on to the value of another golf resort on the economic development of the area. With fourteen golf courses² there appears to be a saturation of golf facilities in the Wirral. Does it need another? As it is, you can almost walk around the Wirral Peninsula from one Golf Course to the next.
39. Neither a need assessment nor economic impact assessment has been undertaken to justify a new golf resort. The multiplier effect of another golf club and possible benefits to supply chain businesses need to be better understood, as it is likely it would not yield significant local benefit.
40. Furthermore, the likely environmental impacts such as impact on natural habitats, water supply and drainage and need to be more fully informed. An environmental impact statement and a hydrology report would be required to understand the issues fully.
41. Cycling should be supported with additional infrastructure for cyclists such as cycle lanes, secure parking racks and signage to help them navigate the area safely.
42. It is good that the MORI poll indicates more visitors are satisfied with the area. The potential for golf related tourism cannot be based only on the increase in Council website traffic.

Theme 3: Getting Around Hoylake

43. It is good that a large proportion of the population of the Neighbourhood are within a 10 minute walk of the town centre. Cycling could increase with improved infrastructure to promote it.
44. Direct bus services in each direction linking West Kirby and Birkenhead are every 15 minutes during the week, half-hourly on Saturdays and hourly on Sundays. For further destinations an improvement is required. The area is served by two rail stations with regular (every 15 minutes) services to West Hoylake and Liverpool.

² Wirral Golf Clubs: Heswall, Caldy, Royal Liverpool, Hoylake Municipal, Leasowe, Wallasey, The Warrens Municipal, Bidston, Arrowe Park Municipal, Wirral Ladies, Prenton, Brackenwood Municipal, Bromborough, Eastham Lodge. Other Golf Places: Moreton Hill Golf Centre, Port Sunlight Driving Range, Prenton Driving Range, Championship, Adventure Golf. Peninsula Golf Tours. Also Mollington just north of Chester Carden Park.

45. Hoylake is located along a single highway (A540/A553). Traffic flow is congested at peak times. Also of note is that the promenade is one-way from Kings Gap in the West to Hoyle Road in the East.
46. No aspiration to improve local public transport is stated under this theme.

Theme 4: Special Buildings and Places

47. There are two Conservation Areas and numerous listed buildings within the boundary. Heritage assets of the area are well documented in Appendix 1, and locations identified on Map 3, and a comment that more buildings would qualify for listing but currently do not benefit from statutory protection.
48. Protecting and enhancing the built heritage is crucially important due to their intrinsic value and for attracting people to visit the area.

49. Theme 5: Homes in Hoylake

50. The Wirral Strategic Housing Market Area (SHMA) and Strategic Housing Land Availability Assessment (SHLAA) provide the evidence base for this theme. Key housing issues are identified.
51. Forty per cent affordable new-build housing is recommended and this will help to house those who are least well off, and should help to achieve a balanced community in the future.
52. The housing requirement for Hoylake and Meols is 153 dwelling per annum (dpa). This figure should be reduced to reflect the smaller area covered by the Neighbourhood Plan to understand how much housing, and what type and size of dwellings ought to be brought forward to respond to objectively assessed need. By scaling down the requirement we consider a figure of approximately 25 dpa to be an acceptable level of homes in the Neighbourhood Plan area.
53. A significant development has already been built out on Market Street, and a further outline consent exists on Charles Road, it could be said that the Hoylake Neighbourhood Plan should be planning for approximately 18 dpa. The supply of housing land is identified to be able to accommodate 90 dwellings, 67 dwellings on brownfield (previously developed), and 23 dwellings on greenfield land. Assuming the sites are viable and immediately available this means Hoylake can demonstrate a 5-year supply of housing.

Theme 6: Enhancing Carr Lane Industrial Estate

54. The site accommodates 120 small and medium sized enterprises, is well occupied and has potential to bring forward four further sites for use. Scottish Power has a base there due to the location of a National Grid high voltage point.
55. A housing scheme at Carr Lane, was recently refused to the south of Hoylake at appeal.

Developing Consensus

56. A household survey was completed in 2012/13 with 550 responses, equal to ten per cent of households. The feedback was analysed. Further consultation informed the exercise.
57. It is claimed, without robust linkage between the household survey, that a clear consensus was arrived at to inform the policies and priorities. Until the responses have been submitted to this consultation it is difficult to know what the level of support, or opposition, is in fact.

Hoylake Vision Forum and the Area Geography

58. The Hoylake Community Planning Forum (Hoylake Vision) was designated as the formal body to progress the Neighbourhood Plan in April 2013.
59. **Comment:** CPRE Wirral represented by The Wirral Society would like to be included in Hoylake Vision in the future to better represent the interests of those who value the rural parts of Hoylake and the wider Wirral Peninsula.

Is the boundary suitable for the Hoylake Neighbourhood Plan?

60. **Comment:** It is important that the Neighbourhood Plan is more than a site development brief for the new golf resort.
61. Having undertaken an area visit the area boundary is questionable. The neighbourhood boundary to the south and east area very closely resembles the defined area of the proposed new resort golf course. The West boundary again stretches west beyond the “Hoylake” sign and again resembles the area defined for the new resort golf course. The inclusion of the open Green Belt land to the south of the Hoylake township must be questioned. It would appear that its inclusion is, as referred elsewhere, only to make this Neighbourhood Plan a brochure for the resort golf course. The boundaries should reflect not just the signage, but the historical area, and functioning economic boundaries of Hoylake. The boundary stops short of the beach, and there is no explanation as to why the beach is excluded from the Neighbourhood Plan.

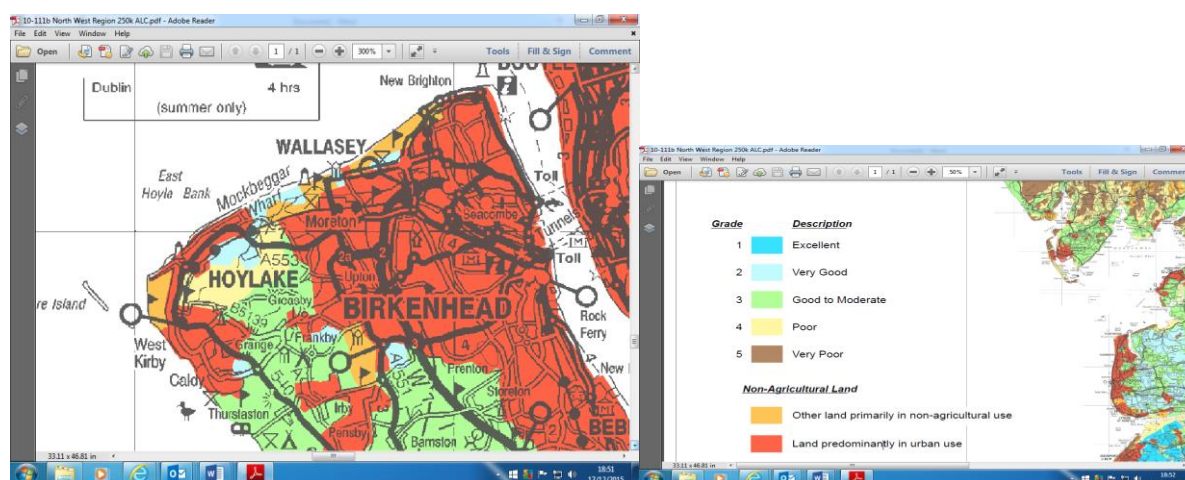
Evidence Base

Is the evidence base accurate?

62. The evidence base should be more fully written into the Neighbourhood Plan to provide the justification for the policies and priorities. Currently the connections are loose.
63. There is no evidence to suggest there is a need for a fifteenth Wirral Golf course. There has been no economic impact or leisure study to justify why a new golf resort on land currently used for farming. The land is outside the settlement boundary and most importantly is protected by its Green Belt designation. An access via the level crossing would need to be considered and a new road would have a significant adverse impact on the environment.

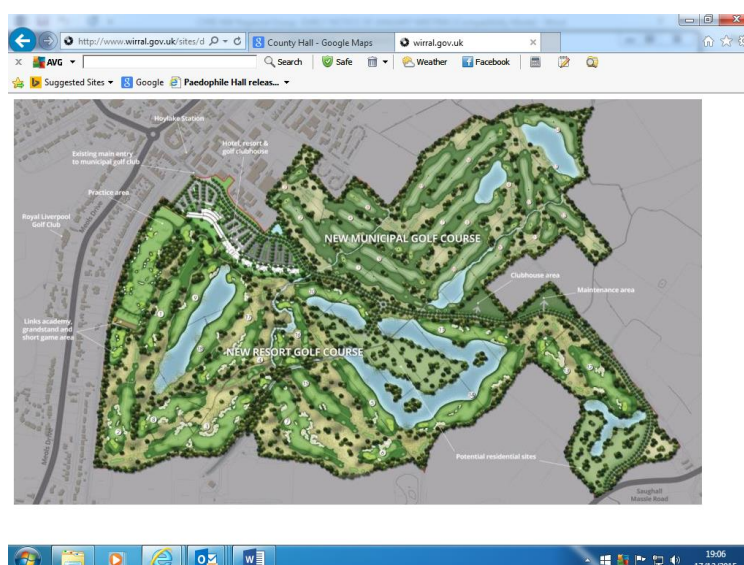
64. An Environmental Impact Assessment would be required to understand the adverse consequence to habitat, wildlife, water quality, water supply, use of pesticides/fertiliser of a new golf resort and associated road and housing developments. An understanding of the mitigation, compensatory works and other issues need to be fully understood.
65. Understanding the hydrology of the upper part of the Birket catchment, a low-lying, low-gradient flood plain across north Wirra is important. The area has been subject to flooding at frequent intervals.
66. We suggest that a map showing Natural England's Agricultural Land Classification (ALC) should be included. We understand the mapping shows part of the green fields to the south of Hoylake as very good quality and this is protected by the NPPF Paragraph 112 and 143 as they are Agricultural Land Classification Grade 1, 2 or 3a. Please refer to the extract of ALC map with legend and proposed golf course boundary below. The proposed golf resort is unlikely to enhance the quality of the soil, and this is another reason that we think it should not be pursued.

Natural England Soil Designation



<http://publications.naturalengland.org.uk/publication/144015?category=5954148537204736>

Proposed Golf Resort



Is the evidence base representative?

67. There seems to be a high degree of subjectivity in the document concerning the desirability of the proposal for a new golf resort on farmland to the south of Carr Lane Industrial Estate.

Hoylake Neighbourhood Plan Vision

Is the Vision an acceptable starting point to underpin the Neighbourhood Plan?

68. There is no mention of natural assets and given half of the, questionable, area is rural this is a significant omission. For example, the neighbouring habitat is significant for Black Tailed Godwits

The Vision

69. *“To maintain Hoylake as an attractive seaside town and a popular place to live in and visit. To be a healthier, socially conscious community with a thriving economy, which values creativity and entrepreneurialism. To support a vibrant town centre, which meets the day to day needs of local people and provides high quality food, drink and entertainment opportunities for residents and visitors. To support the town centre and the Carr Lane Industrial Estate as the foci for a wide range of easily accessible jobs.”*
70. This is a series of statements and not a proper vision. It is weighted heavily towards economic factors relative to social and environmental factors (see NPPF paragraph 7) and, therefore is not balanced. The environment is a key attractor for people and businesses alike, it keeps people healthy and adds to the quality of life, and it has intrinsic value in its own right.

5.1 Protection of Natura 2000 Sites

71. A definition of Natura 2000 sites may provide clarity to Policy NC1. Natura 2000 sites consist of a network of nature protection areas in the territory of the European Union. It is made up of Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) designated respectively under the Habitats Directive and Birds Directive. The network includes both terrestrial and marine sites (Marine Protected Areas).
72. It is essential that all necessary studies are carried out to best practice standards. In 2008 there was a proposal to designate part of the area as Site of Biological Importance, therefore understanding the mammals, reptiles, birds, plants, trees and hedgerows is clearly very important. See land included in the Golf resort in the photo inserts below.
73. It is possible that Policy NC1 contravenes European legislation such as Habitats Regulations 2010 on Natura 2000 sites and our view it misrepresents the intention of NPPF Paragraph 116 which sets out that, when determining planning applications, Local Planning Authorities refuse proposals that are harmful to protected sites, except in exceptional circumstances and where it can be demonstrated that the proposals are in the public interest.
74. There is nothing in the Neighbourhood Plan that constitutes very special circumstance. The proposed new golf resort could not be judged to be an exceptional circumstance in Hoylake due

to the existence of 14 golf courses in Wirral alone, including private and municipal golf courses. This includes and the world famous Links course, the Royal Liverpool Golf Club in Hoylake which played host to The Men's Open Championships in 2006, 2014, and The Women's Open in 2012.

Photos of land included in the Golf resort



75. It is not generally in the public interest to destroy Natura 2000 sites. Mitigation or compensatory provision is less sustainable than leaving habitat and wildlife undisturbed. The Policy NC1 ought to be written to actually conserve and enhance biodiversity.

5.2 Improving the Town Centre

76. The priority set out is to maintain the extent of retail uses along the linear corridor, despite the indication from Wirral Council in the Core Strategy Local Plan that Hoylake is to be defined as a 'District' rather than 'Key Service Sector' and to accommodate changes in retail patterns.
77. High quality public realm is sought and increased use of upper floors of shops to add to the vibrancy of the district centre, particularly at night time. The community indicated that further non-alcohol based leisure facilities are required such as cinema, arts venue etc.
78. Whilst policies HS1 to HS6 are primarily urban focused it is worth mentioning for HS1 *Active Frontages* that care should be taken not to over represent charity shops, pound shops, betting shops and takeaways as this can actually tip the balance between a place being attractive or not. NOTE: Reliance on takeaways has been shown to have adverse health impacts.
79. There is a disconnect between the shops and the promenade as users have to travel through residential streets causing disturbance. A masterplan would help to better link the two places and encourage the right mix of development to support the improvement of the town centre, whilst the shop front design guide would help improve the street scene.
80. Job creation would help the economic fortunes of the area.

5.3 The Promenade and Recreation

81. The promenade is no longer being as effectively utilised as it should be. There are toilets at the eastern end of the promenade in Meols, but the toilets at the end of Trinity Road have been closed. Innovative ways of increasing visitor numbers are required. This in part is to do with physical infrastructure, including amenities, and the other is to communicate that it exists, via signage and to advertise a wider programme of events to attract different groups of residents and visitors of all ages and backgrounds.
82. The beach is not included in the area boundary. This strip of coast ought to be included if the promenade and recreation is an identified priority for Neighbourhood Plan policy. The map shows how the seafront attractions of Meols have been captured in the area, which represents a spur extending from the area to the north. The sea facing houses on the promenade are shown in the photo below.
83. The paragraph about the beach being an ecological asset is confusing due to the use of a double negative and would benefit from a re-write.
84. Other recreational facilities are referred to. Some key facilities are not mentioned such as the play area on Carr Lane, shown in the photo below.

Photos: The sea facing houses on the promenade and Carr Lane Play Area



85. A new skate park is identified as needed/desired by residents. A statement is made about there being a clear mandate from residents from the community to improve the promenade and recreation. Whilst it may be true the household survey did show support for the promenade and recreation the public has not yet signed up for the policies and priorities. The purpose of this current consultation is to gauge the level of consensus.
86. The policies and priorities BR1 and BR2 seem acceptable.

5.4 Getting around Hoylake

87. TR1 *Market Street* is a bit limited given the issues and opportunities and community views. The Neighbourhood Plan ought to more fully embrace sustainable transport modes and public transport to help relieve congestion on Market Street.
88. Planning policies can identify sustainable transport infrastructure requirements, and ensure that any new development that comes forward covers the costs of a range of non-motor based transport improvements.
89. We are supportive of improving the Public Rights of Way across Hoylake, especially enabling people to walk and cycle into the beautiful local countryside.

5.5 A Distinctive Identity: Special Buildings and Places

90. The DI Policies are generally acceptable. They will support the protection and enhancement of Hoylake's built environment.
91. The creation of a heritage trail should include reference to the important work of Sir Patrick Abercrombie, world renowned architect and Professor of Civic Design at Liverpool University. He was a founder of the Wirral Society, whose members have combined to ensure much of Wirral Peninsula's natural environment has been protected to date.

5.6 Homes in Hoylake

92. CPRE believes it is right that planning should ensure everyone has a decent home to live in. Issues with availability and affordability should be addressed. We are generally supportive of policies H1, H2 and H3. Living over the shops would address upper floor vacancy in the district centre.
93. We advocate that previously used land is used in advance of farmland to provide for an identified need of new homes. Where new housing is identified as needed and cannot be accommodated on brownfield land, infill, or windfall sites, and planned extensions to urban areas should be based in most sustainable locations with adequate infrastructure included to ensure economic, social and environmental factors are truly brought into balance.
94. Land with Green Belt designation should not be developed for new housing unless it can be demonstrated that very special circumstances exist.

H.7. Enhancing Carr Lane Industrial Estate

95. The new golf resort is seen as an opportunity to build a new road across land designated as Green Belt. The proposed new road would be contrary to the purposes of Green Belt designation and many organisations would object to the proposal.
96. If a wildlife and wetland centre is evidenced as needed, because of the visitors it could attract and educational benefits, the Neighbourhood Plan should support its development. In fact the Neighbourhood Plan suggests non-alcohol based leisure developments would help the visitor economy and it would help diversify what is a saturated golf market.

97. CL1 is good as it includes a sequential approach to the development of land (i.e. using previously developed land in advance of greenfield land).

98. Policy CL2 *Comprehensive Redevelopment* accepts employment development in land designated as Green Belt. The Neighbourhood Plan has no statutory remit release Green Belt land for development and is contrary to the NPPF Section 9. This policy is in effect unsound and would be challenged; it would not stand up to the independent examination.

6. Making it Happen

99. Hoylake Vision with the Council will monitor the effectiveness of the Neighbourhood Plan.

100. Hoylake Vision will actively pursue funding and political consensus to implement the area action planning work identified.

Stakeholders

101. It is difficult to ascertain whether the Neighbourhood Plan Process has been truly inclusive of all stakeholders; as there is a lack of reference to the environment, it is doubtful that other environmental organisations have been consulted. This can be remedied in the future.

102. There is no reference to those people who disagree with any element and on what grounds they object? There must be some local stakeholders who do not wish to see their local countryside developed.

Independent Examination

103. To comply with the National Planning Policy Framework, 2012 (NPPF), the Neighbourhood Plan must be judged to be positively prepared, justified, effective and consistent with national policy.

Conclusions

104. The NPPF requires that sustainable development should be enabled bringing economic, social and environmental factors into balance. It is only by striking a balance will truly 'sustainable development' be enabled, thereby protecting and enhancing Hoylake's distinctiveness of place.

105. The Wirral Peninsula's natural beauty, architecture, flora and fauna and its coast should be protected and enhanced in the future. Problems identified with the Submission Draft Neighbourhood Plan are as follows:

- The boundary is poorly defined and ought to include the beach, and should exclude the fields to the south and either be drawn tightly around Hoylake town or extend to Graham Road in the West and include Queens Park to the East (if it is going to include Meols sea front attractions).

- The summary of Hoylake Today and Tomorrow is rather subjective in nature. It lacks robustness. The section would benefit immensely from inclusion of factual data to back up a number of statements, which without such data are unclear, difficult to understand, and lack rigor.
- There is no reference to Climate Change Act 2008 and this is a significant omission.
- There are no references to air quality, tranquillity, trees, or hedgerows.
- No theme relates to the environment of natural assets, arguably the natural starting point for the Neighbourhood Plan as it offers immense residential amenity and keeps people fit and healthy by offering walking and cycling opportunities on the doorstep.
- The evidence base should capture the biological importance of the area if it is to include the rural area. The Neighbourhood Plan omits reference to the rural character of half the area, indicating that this out of settlement area should be logically omitted.
- The Neighbourhood Plan is too economically focused.
- The Neighbourhood Plan is contrary to European legislation and the NPPF concerning biodiversity protection and enhancement.
- In places, the document reads like a development brief for a new golf resort, without the necessary supporting evidence base to demonstrate a fifteenth Wirral golf course is in fact needed. The hydrology of the area may be adversely impacted.
- The Neighbourhood supports Green Belt loss without very special circumstances being demonstrated.
- The natural assets are not properly evidenced, mapped or prioritised.
- The Neighbourhood Plan ought to more fully embrace sustainable transport modes and public transport to help relieve congestion on Market Street.
- Infrastructure requirements need to be more fully considered.
- Access to rural areas could be improved.
- Stakeholder engagement appears limited and should be widened.

Recommendations

106. The Submission Draft would be improved by the following considerations:

- An area boundary revision.

- Strengthening the evidence base in justification the proposed policies and priorities.
- The Climate Change Act 2008 ought to be referred to in the document.
- Reference to protecting and enhancing the area's air quality, tranquillity, trees, and hedgerows would help improve the quality of Hoylake as a place in the future.
- The introduction of a natural environment theme, or a cross cutting theme underpinning all the policies and priorities, is important.
- Reference to the rural half of the geography would make the document more complete. The grade of farmland is not referred to. Is it BMV, i.e. ALC Grade 1, 2 or 3a? If so, is protected?
- The Neighbourhood Plan should include more reference to social issues and the natural environment.
- The Neighbourhood Plan must comply with European legislation and the NPPF environmental protection.
- The Neighbourhood Plan should be more about the whole community of Hoylake and not be a development brief for a new golf resort. If the planning case is made a development brief would occur later in the process.
- No planning case has been made for the need for a further golf course. The proposal and the new road and major housing development would be contrary to the five important purposes of Green Belt designation.
- An assessment of the hydrology is important to understand flooding issues more fully.
- The Neighbourhood Plan cannot promote Green Belt loss.
- The natural assets need to be fully evidenced, mapped and prioritised with specific policies to ensure protection and enhancement in the future.
- Sustainable transport mode improvements should be incorporated.
- Infrastructure requirements should be fully detailed.
- New and improved Public Rights of Way, with signage/waymarkers and other amenities would improve the local communities access to their rural areas.
- Stakeholder engagement should be widened. The Wirral Society has a real interest in the economic, social and environmental future of Hoylake and needs to fully engage with the planning process.

