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Submitted to Proposed reforms to the National Planning Policy Framework and other changes to the planning system
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Scope of consultation

Respondent details

a What is your name?

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c What is your organisation?

Organisation:
Wirral Wildlife, QAVS, the local group of Cheshire Wildlife Trust,

d What type of organisation are you representing?

Interest group or voluntary organisation

If you answered "other", please provide further details:

Chapter 1 – Introduction

Chapter 2 – Policy objectives

Chapter 3 – Planning for the homes we need

1 Do you agree that we should reverse the December 2023 changes made to paragraph 61?

No

Please explain your answer:

RESPONSE FROM WIRRAL WILDLIFE, the Wirral Group of Cheshire Wildlife Trust.

We were founded in 1971, have therefore over 50 years expertise in local planning matters, and in 2017 were awarded the Queens Award for Voluntary Service for inspiring, informing, educating and encouraging people to protect nature in Wirral.

Q1; We are in a climate and nature emergency and this must be considered in all policy changes. Climate and nature impacts of all policies must be considered. We also have a health crisis and a housing crisis. Government must use joined-up thinking to address these. We need the right approach to the planning system to address all of these together in a sustainable way. This requires a national consideration of land use planning that fully integrates economic, social and environmental objectives and covers nature restoration, food production, ecosystem services such as flood control, as well as built development. For instance, all new building, housing, facilities and industrial, should be built to as low a carbon cost as possible and should be designed to be zero-carbon in use. Biodiversity Net Gain should be raised to 20% and properly monitored.

Imposing mandatory housing targets is unhelpful as it does not reflect the more nuanced approach already within the NPPF, that the current consultation proposes to retain. 'One size fits all' does not work: for each area there needs to be a calculation of housing need, delivering the types and tenures of housing required to support the local community. This will need local evidence.

Pa 62(new) and deleted old Pa 62: designating Housing land nationally has to consider need (where are the jobs and services), climate change (people should be able to live as close to their work as possible, or close to good public/active transport links to that work), nature protection and restoration (needed for our future food and other ecological services), food supply (as climate change reduces food production across Europe and the world), the need for good quality urban greenspace for people's mental and physical health. There is no point building houses in north-west England for people whose jobs are in London and the south-east! Geography and soils cannot be easily changed.

Built development often puts pressure on the natural environment and can lead to loss or degradation of sites of high environmental value – thus undermining the environmental capacity of an area to provide water, clean air and a landscape that can react to a changing climate, for the benefit of people and wildlife.

It should never be acceptable for housing development to override legal protections for nature. All existing protections for international, national and local sites of wildlife importance must be retained. Otherwise the nature crisis will deepen and we will reap the consequences e.g. in lack of pollinators.

Specifically:

Footnote 7 should be amended to include Local Wildlife Sites. The NPPF must be clear that, in determining a housing target in local plans, direct and indirect impacts on internationally, nationally and locally designated sites should be incorporated.

Local Wildlife Sites (LWS) are not currently included in Footnote 7, which lists the areas or assets of particular importance which (in plan making) provide a strong reason for restricting the overall scale, type or distribution of development in the plan area; and (in decision making) a clear reason for refusing a proposal.

Local Wildlife Sites and other priority habitats outside of LWS are of great significance as core wildlife-rich habitats of substantive nature conservation value. Remember that SSSIs are a representative series, LWS a comprehensive series where all habitat satisfying the criteria are designated. Sites of Special Scientific Interest (SSSIs) and LWS together represent a major national asset, essential to nature's recovery and achieving national commitments to '30 by 30'. As such they are recognized in the statutory guidance for Local Nature Recovery Strategies (LNRS) as 'areas of particular importance for biodiversity that Responsible Bodies should map, alongside national conservation sites and irreplaceable habitats'. Furthermore, LPAs are required to take account of their relevant LNRS as part of the strengthened biodiversity duty.

Local Wildlife Sites have no legal protection, so maintaining and strengthening planning policy to ensure strong protection from the direct and indirect impacts of development is absolutely crucial in securing these nature targets and reversing the declines in wildlife. This includes adding them to footnote 7. See more (under Qs.23 and 28) on the unintended consequences on LWS of the proposed new policies on releasing Green Belt as Grey Belt, if they are not recognized in footnote 7.

Section 15. Conserving and enhancing the natural environment must be updated to reflect the Environment Act 2021.

Pa 180-188 should be major considerations in all development proposals, if we are to effectively tackle the nature and climate emergency.

The NPPF should put protection of Local Wildlife Sites and Priority Habitats on an equivalent footing to SSSIs, as being essential to restoring nature in accord with the 'Lawton principles' – more, bigger, better, joined-up.

The NPPF should recognise the need to buffer wildlife-rich sites against development to lessen the impact of people, pets, artificial light, noise, pollution, etc

We object to the removal of footnote 63: climate change is already impacting food supplies across the globe and we cannot rely on current levels of food imports. All farmland of Grades 1-3 should be protected. Once built on, that fertility cannot be restored in human timescales.

Pa 185: should specifically refer to and support Local Nature Recovery Strategies (due to be ready in 2025) and ensure that development does not prevent their implementation e.g. by blocking wildlife corridors.

2 Do you agree that we should remove reference to the use of alternative approaches to assessing housing need in paragraph 61 and the glossary of the NPPF?

No

Please explain your answer:

Q2: There must always be room for local circumstances to be considered in planning. Local democracy must also be respected. Wirral is a peninsula with water on 3 sides, 12 SSSIs, the coastal ones internationally important, and 75 LWS. Geography cannot be changed.

Pa 62(new) and deleted old Pa 62: designating Housing land nationally has to consider need (where are the jobs and services), climate change (people should be able to live as close to their work as possible, or close to good public/active transport links to that work), nature protection and restoration (needed for our future food and other ecological services), food supply (as climate change reduces food production across Europe and the world), the need for good quality urban greenspace for people's mental and physical health. There is no point building houses in north-west England for people whose jobs are in London and the south-east! Geography and soils cannot be easily changed.

3 Do you agree that we should reverse the December 2023 changes made on the urban uplift by deleting paragraph 62?

Not Answered

Please explain your answer:

4 Do you agree that we should reverse the December 2023 changes made on character and density and delete paragraph 130?

Not Answered

Please explain your answer:

5 Do you agree that the focus of design codes should move towards supporting spatial visions in local plans and areas that provide the greatest opportunities for change such as greater density, in particular the development of large new communities?

No

Please explain your answer:

Q5: Design: All new building, housing, facilities and industrial, should be built to as low a carbon cost as possible and should be designed to be zero-carbon in use. Biodiversity Net Gain should be raised to 20% and properly monitored. Avoiding negative impacts on the natural environment and integrating nature into the design of new and existing housing will deliver countless cost-effective benefits for developments (including climate resilience) and the people and communities that occupy them. For example, urban trees fix carbon, aid privacy, provide shade and help reduce pollution and flash flooding; community green spaces bring people together; local parks and woods provide valuable places for people to walk, play and relax, benefiting their mental and physical health. To help the NHS, we need prevention of illness to take precedence (report issued 12/9/24).

Pa 27a should specifically add effects on climate and nature restoration.

6 Do you agree that the presumption in favour of sustainable development should be amended as proposed?

No

Please explain your answer:

Q6: To ensure genuinely sustainable development, policy for development including housing delivery must be joined up with other strategic priorities and policy requirements. The other parts of sustainable development must be of equal importance with built development. The environment must be sustained and restored if the human species is to have a future, and the economy of each area has to be considered in assessing housing need.

7 Do you agree that all local planning authorities should be required to continually demonstrate 5 years of specific, deliverable sites for decision making purposes, regardless of plan status?

No

Please explain your answer:

Q7 No. Having to maintain a constant 5 year Housing Land Supply undermines plan making. Local Plans should ensure housing allocations are informed by the right evidence to ensure the most sustainable locations are identified at the outset. Evidence should include the Local Nature Recovery Strategy and ecological survey and expertise so that constraints and opportunities are recognised and the mitigation hierarchy is applied from the outset.

8 Do you agree with our proposal to remove wording on national planning guidance in paragraph 77 of the current NPPF?

Not Answered

Please explain your answer:

9 Do you agree that all local planning authorities should be required to add a 5% buffer to their 5-year housing land supply calculations?

No

Please explain your answer:

Q9, Q10: buffer. No. There should be no need for a buffer in a well evidenced planning system, which is plan led with timely delivery of permissions. But if there is to be one it should not be higher than 5%. A buffer risks land being released for development that proves unnecessary. This can undermine efforts for regeneration if greenfield land is released, which inevitably gets developed first as it is cheaper and easier, leaving the regeneration of brownfield land last. So often regeneration then fails to happen.

10 If Yes, do you agree that 5% is an appropriate buffer, or should it be a different figure?

No (It should be a different figure)

Please explain your answer if you believe a different % buffer should be used:

Less than 5% because of the reason given above in Q9.

11 Do you agree with the removal of policy on Annual Position Statements?

Not Answered

Please explain your answer:

12 Do you agree that the NPPF should be amended to further support effective co-operation on cross boundary and strategic planning matters?

Yes

Please explain your answer:

Para 24: cross-boundary consultation: we support the modification, as administrative boundaries can make no ecological sense (e.g. between Wirral and Cheshire), but it must not be used in ways that harm nature or that harm the climate e.g. by forcing people to live further from their jobs. All areas must have the same protections for SSSI, LWS, Priority Habitats, BMV farmland.

Pa 27a should specifically add effects on climate and nature restoration.

We note Government intends to consult on the introduction of SDSs across all areas. SDSs should be informed by an overarching spatial strategy for land use in England. A Land Use Framework underpinned by strategic spatial planning would help plan sufficient space nationally for nature's recovery, food production, ecosystem services as well as built development. This will enable us to build sufficient housing and infrastructure to meet net zero carbon targets without making the nature crisis worse. The strategy should identify how land uses should be prioritised and include strategic nature-based solutions to mitigate negative impacts.

13 Should the tests of soundness be amended to better assess the soundness of strategic scale plans or proposals?

Not Answered

Please explain your answer:

14 Do you have any other suggestions relating to the proposals in this chapter?

Please provide any other suggestions relating to the proposals in this chapter. :

Chapter 4 – A new Standard Method for assessing housing needs

15 Do you agree that Planning Practice Guidance should be amended to specify that the appropriate baseline for the standard method is housing stock rather than the latest household projections?

No

Please explain your answer:

Up to date LOCAL data must be used in all planning – the use of one-size-fits-all or decade-old data is wrong. Wirral had almost no population growth 2011-2021, because the jobs available did not increase. Sensible planning must use as recent data as is practicable, and use those to make best estimates of LOCAL NEED. Imposing a vastly inflated housing number, as is proposed for Wirral (from 728 to 1755 per year) is senseless if the land available, economy and nature restoration needs will simply not accommodate this on a peninsula, with water on three sides.

Housing need is assessed in categories – Wirral needs many small properties for single people, small single-parent families, older people down-sizing. It needs few large 5-bed homes. Housing target in the Local Plan should therefore not be just a single number, but be broken down into the same categories, with the right for local planning authorities to refuse applications for excess un-needed properties and only approve ones that match the housing need. The market is a slow and poor mechanism for achieving this and will not address the current crisis – indeed it has helped to make the crisis worse, as developers get more profit from a few large houses than from more smaller ones.

16 Do you agree that using the workplace-based median house price to median earnings ratio, averaged over the most recent 3 year period for which data is available to adjust the standard method's baseline, is appropriate?

No

Please explain your answer:

Q16,Q17. Pa 66: not our expertise as a Wildlife Trust but as local people we are well aware that `affordable' needs a new definition. 80% of market value of a £300,000 new house built on Green Belt land and requiring a car for access (as Leverhulme Estates proposed 2022) is not affordable to Wirral's 1000 people in dire housing need, nor the poorly-housed. Social housing close to existing jobs, transport, nature and other good quality greenspace, medical facilities, schools, etc is what is needed.

A new affordable definition should relate to Living Wage and to local earnings.

17 Do you agree that affordability is given an appropriate weighting within the proposed standard method?

No

Please explain your answer:

Q16,Q17. Pa 66: not our expertise as a Wildlife Trust but as local people we are well aware that `affordable' needs a new definition. 80% of market value of a £300,000 new house built on Green Belt land and requiring a car for access (as Leverhulme Estates proposed 2022) is not affordable to Wirral's 1000 people in dire housing need, nor the poorly-housed. Social housing close to existing jobs, transport, nature and other good quality greenspace, medical facilities, schools, etc is what is needed.

A new affordable definition should relate to Living Wage and to local earnings.

18 Do you consider the standard method should factor in evidence on rental affordability? If so, do you have any suggestions for how this could be incorporated into the model?

Not Answered

Please explain your answer:

19 Do you have any additional comments on the proposed method for assessing housing needs?

Please provide any additional comments on the proposed method for assessing housing needs.:

Q19 Pa 15. We support change, but add that plans must have the democratic support of their local community, as we achieved in Wirral with all councillors of all parties supporting the Local Plan. Once this is achieved, plans should be passed asap and any changes to national policy should await a review. The Planning Inspectorate should be properly resourced to speed up Local Plan adoption. Local democracy MUST be respected.

Section 5 Delivering homes: As local people we submit this does not address the problems of housing that has planning permission but construction is long delayed; only the first few are built and the rest kept back for years (e.g. Ledsham, Ellesmere Port). It does not address long-term empty buildings that could be converted or replaced. It does not address the slow business of selling a property, exacerbated by frequent cases of a buyer withdrawing, and delays in probate, such that there are properties standing empty for months, often a year, while the legal wheels turn. It does not consider where money should come from to clean up brownfield sites where the polluter no longer exists to be charged, as is the case with many older industrial sites. Designating Housing land nationally has to consider need (including where are the jobs and services), climate change (people should be able to live as close to their work as possible, or close to good public/active transport links to that work), nature protection and restoration (needed for our future food

and other ecological services), food supply (as climate change reduces food production across Europe and the world), the need for good quality urban greenspace for people's mental and physical health. Geography and soils cannot be changed.

Chapter 5 – Brownfield, grey belt and the Green Belt

20 Do you agree that we should make the proposed change set out in paragraph 124c, as a first step towards brownfield passports?

No

Please explain your answer:

In principle we support the development of suitable brownfield land, but we disagree with the blanket approach that all suitable brownfield sites are 'acceptable in principle'. Decisions must be made on a site by site basis, as a) some brownfield land has high nature conservation value (especially for insects, which are declining at an alarming rate, some figures show now only a quarter of the biomass present in 1970). b) some brownfield has recreation value for local people, important for their mental and physical health.

Pa 122 and pa 132: Must say that the presumption in favour of brownfield will still require to follow the development hierarchy, including Biodiversity Net Gain (to protect nature), also provision of suitable accessible high-quality and naturalistic greenspace (to restore nature and to discourage driving to distant or sensitive green spaces for recreation, and to improve people's physical and mental health).

Guidance should recognise high environmental value brownfield sites as those that:

- Contain priority habitat(s) listed under section 41 Natural Environment and Rural Communities Act 2006.
- Host certain protected or priority species.
- Hold a nature conservation designation such as Site of Special Scientific Interest, or are selected as a Local Wildlife Site or meet Local Wildlife Site criteria.
- Host regionally 'significant' populations of protected/priority/notable species or assemblages.

In addition, before allocating or approving a brownfield site development, it must be surveyed by skilled ecologists to assess the ecological value and its potential to support nature's recovery, especially if it is adjacent to existing habitat of value. This would help avoid the loss of and damage to potential or actual sites of high environmental value, which may not be protected currently due to a lack of up-to-date information.

21 Do you agree with the proposed change to paragraph 154g of the current NPPF to better support the development of PDL in the Green Belt?

Not Answered

Please explain your answer:

In principle we have no objections to the proposed change, but this is dependent on the safeguards raised in relation to brownfield land under Q 20. Because we are in a nature and climate emergency, in any proposals, protection must be given to all SSSI, Local Nature Reserves, Local Wildlife Sites, the Local Nature Recovery Strategy and other priority habitats and species.

22 Do you have any views on expanding the definition of PDL, while ensuring that the development and maintenance of glasshouses for horticultural production is maintained?

Please provide any further views:

We currently import 90% of our fruit and a high proportion of our vegetables. This is not sustainable as climate change affects food production worldwide. So all horticultural land should be included as BMV agricultural land and protected from development. This includes glasshouses.

23 Do you agree with our proposed definition of grey belt land? If not, what changes would you recommend?

No

Please explain your answer:

'Grey belt' should exclude all nature-rich areas and suitable buffer zones to these. Also Best and Most Versatile farmland (Grades 1-3 inclusive), because of the need to safeguard a sustainable food supply as climate change reduces food availability across the world.

The Green Belt purposes do not include anything about nature conservation and restoration, or food production. Grey Belt therefore needs to exclude areas and assets identified in footnote 7 and the Local Nature Recovery Strategy (LNRS) or equivalent, including the addition of Local Wildlife Sites and other areas of priority habitat. Draft LNRS strategies should be considered in the absence of published documents (due mid-2025). We have been heavily involved in preparing the Liverpool City Region LNRS. The statutory LNRS guidance requires mapping of 'areas of particular importance to biodiversity', but also requires responsible bodies to 'map areas that could become of particular importance for biodiversity' or 'where the recovery or enhancement of biodiversity could make a particular contribution to other environmental benefits'. These strategies should not be undermined by releasing actual and potential areas of particular importance to biodiversity as grey belt. Instead, the LNRS should serve as an important decision-making tool to ensure such areas are not released for grey belt development. Government must use joined-up thinking.

24 Are any additional measures needed to ensure that high performing Green Belt land is not degraded to meet grey belt criteria?

Yes

Please explain your answer:

The Environment Act 2021 has, in Schedule 14, measures to address the problem of owners degrading the biodiversity of land to avoid Biodiversity Net Gain (in response to many cases of this happening, 17 cases in Wirral in the last 3 years). Equivalent safeguards are needed for the other purposes of Green Belt land, including setting a date, preferably the publication of this review of the NPPF, after which all such degradations shall not be effective in changing the designation to Grey Belt, and all such sites will have to be restored to original condition. Original condition can be assessed from satellite mapping (Google Earth etc), drone pictures and other photos e.g. those taken by local people, and written evidence from anyone who knows the site. The rules also need to ensure areas exempt for nature and climate reasons and assets of environmental value are not degraded. It is vital that the Local Nature Recovery Strategy is integrated within the local plan, and decisions informed by up to date ecological knowledge. Unfortunately we know that unscrupulous people are likely to try to degrade Green Belt land to get it to qualify for Grey Belt, in exactly the same way as they degrade the biodiversity of sites to try to avoid Biodiversity Net Gain .

25 Do you agree that additional guidance to assist in identifying land which makes a limited contribution of Green Belt purposes would be helpful? If so, is this best contained in the NPPF itself or in planning practice guidance?

Yes and it should be contained within the NPPF

Please explain your answer:

Guidance is certainly needed. When a review of Wirral's Green Belt was undertaken in 2018, the criteria were not obvious. The criteria should be in the NPPF itself, for avoidance of all doubt and to avoid the delay in preparing guidance, during which sites may be claimed as Grey Belt in error. See our answer to Q23 about excluding land of value to nature conservation and restoration.

26 Do you have any views on whether our proposed guidance sets out appropriate considerations for determining whether land makes a limited contribution to Green Belt purposes?

Yes

Please explain your answer:

The guidance is inadequate as it needs to go beyond the 5 principles of Green Belt and assess whether the land contains areas/assets of climate, environmental or community value, that should be safeguarded in order to meet other strategic priorities for nature's recovery and access to nature (e.g. LNRS, 30x30, climate change commitments). If land is deemed to make limited contributions to the purposes of Green Belt, guidance should be clear that it should not be released for grey belt if it contains areas/assets of environmental value – see our response to Q20, Q23. Because we are in a nature and climate emergency, in any proposals, protection must be given to all SSSI, Local Nature Reserves, Local Wildlife Sites, the Local Nature Recovery Strategy and other priority habitats and species.

In Wirral, perhaps unusually, much nature is in sites in the Green Belt. In a 2018 review of Wirral's Greenbelt, out of 33 sites designated as "weakly-performing Greenbelt", and not currently designated for development, there are serious objections on wildlife grounds to 18, concerns about wildlife impacts for another 5. The 10 remaining are mostly small. Even if designated nature areas are protected, development adjacent to sites of nature conservation and restoration leads to increased pressure from people, pets, artificial light, noise, invasive species and nutrient pollution. This applies to urban and Green Belt sites, but many of these changes are greater in Green Belt areas. Therefore add to the guidance: In addition to the 5 legal principles, climate change and impacts on nature restoration must be considered in all reviews of Green Belt land.

27 Do you have any views on the role that Local Nature Recovery Strategies could play in identifying areas of Green Belt which can be enhanced?

Yes

Please explain your answer:

To achieve nature conservation and restoration, Local Nature Recovery Strategies should be given much stronger weight in the planning system, and underpin all land use planning decisions. We have put much work into the Liverpool City Region LNRS and it will prove an excellent planning tool to support nature's recovery in line with locally identified priorities. It can help steer developments away from sites of existing or potential biodiversity value, so impacts to nature are avoided as part of the first step in applying the mitigation hierarchy. LNRS are designed to target habitat enhancement/creation to the most beneficial areas as selected by local people. Such habitat creation areas must be protected from future development, as an essential requirement for achieving our national commitment to restoring nature and achieving 30 by 30.

28 Do you agree that our proposals support the release of land in the right places, with previously developed and grey belt land identified first, while allowing local planning authorities to prioritise the most sustainable development locations?

No

Please explain your answer:

An example of poor Greenfield release: In Wirral, there was lots of 1950s-1970s building to solve the post-war housing crisis, all on good quality farmland, leaving the older urban centres to decay. Green Belt was then imposed in 1983, but demand slackened off a lot, as available jobs fell or stabilised and population growth almost stopped (Census 2011-2021, only 420 rise in population). Consequently there was not enough pressure for housing to get the developers to regenerate older urban centres in Birkenhead, Wallasey and New Ferry, which continue to decline. Our Local Plan, which has been through its examination in public and should be approved immediately, at last provides the best opportunity in 50 years to get regeneration, but has been delayed by developers (especially Leverhulme Estates) and is threatened by the new extremely high housing numbers proposed for Wirral, which will undoubtedly require Green Belt release. (Increase from 728pa to 1755pa). Developers will always build on Green Belt first and leave the brownfield sites till last, unless they are specifically forbidden to do this by the NPPF and Local Plan – so if Green Belt were to be released in Wirral, regeneration would be at best

delayed again, and at worst, if it is found that the housing need in Wirral is not that large, regeneration will fail again. The harm to nature, climate and food production done by unnecessary building on Green Belt could not be undone. Once land is built on, it cannot easily be returned to food production or nature restoration.

Therefore, the NPPF should state that Green or Grey Belt land, if released by a Local Plan, will not be allowed to be built until at least 90% of the available brownfield land has been developed. Grey Belt land, if any is available, should come next. This provision must over-rule viability claims.

Because we are in a nature and climate emergency, in any proposals, protection must be given to all SSSI, Local Nature Reserves, Local Wildlife Sites, the Local Nature Recovery Strategy and other priority habitats and species.

Pa 155: remove the word 'major' or define it to very small developments (e.g. less than 5 houses).

Define 'good quality green space' including to provide nature-rich environments and set out means by which these will be maintained long-term (will overlap with BNG requirements if these are set at 20% and properly assessed and enforced)

Lay down standards for adequate buffer zones or other protection for existing wildlife-rich areas e.g. a footpath and new scrub belt around an existing wood will discourage access within the wood to people and pets. (will overlap with BNG requirements if these are set at 20% and properly assessed and enforced).

In Wirral, Green Belt contains wildlife-rich sites (we have 12 SSSIs, 74 LWS in 60 sq. miles), which even if protected themselves, will if housing is built nearby suffer from disturbance by people, dogs, cats, artificial light, noise, invasive species from gardens, etc. However, brownfield can also sometimes hold good amounts of wildlife and BNG has to apply to it. We need good quality farmland for food production, but poor quality farmland (Grade 4-5) is where the wildlife lives.

There are no simplistic answers!

29 Do you agree with our proposal to make clear that the release of land should not fundamentally undermine the function of the Green Belt across the area of the plan as a whole?

Yes

Please explain your answer:

Yes, but also it should be explicitly clear that the release of land should not undermine urban regeneration, nor the strategic priorities for nature's recovery as identified by the Local Nature Recovery Network or equivalent. (see our answers to Q23 and Q28). Because we are in a nature and climate emergency, in any proposals, protection must be given to all SSSI, Local Nature Reserves, Local Wildlife Sites, the Local Nature Recovery Strategy and other priority habitats and species.

30 Do you agree with our approach to allowing development on Green Belt land through decision making? If not, what changes would you recommend?

No

If not, what changes would you recommend?:

No, unless all the safeguards set out above in our responses to Q23 and Q28 are implemented. Then only where LOCAL need is demonstrated, not a one-size-fits all national method. Because we are in a nature and climate emergency, in any proposals, protection must be given to all SSSI, Local Nature Reserves, Local Wildlife Sites, the Local Nature Recovery Strategy and other priority habitats and species.

31 Do you have any comments on our proposals to allow the release of grey belt land to meet commercial and other development needs through plan-making and decision-making, including the triggers for release?

Yes

Please explain your answer:

All the safeguards set out above in our responses to Q23 and Q28 must be implemented. Then only where local need is demonstrated, not a one-size-fits all national method. Because we are in a nature and climate emergency, in any proposals, protection must be given to all SSSI, Local Nature Reserves, Local Wildlife Sites, the Local Nature Recovery Strategy and other priority habitats and species.

32 Do you have views on whether the approach to the release of Green Belt through plan and decision-making should apply to traveller sites, including the sequential test for land release and the definition of PDL?

Yes

Please explain your answer:

All the safeguards set out above in our responses to Q23 and Q28 must be implemented. Then only where local need is demonstrated, not a one-size-fits all national method. Because we are in a nature and climate emergency, in any proposals, protection must be given to all SSSI, Local Nature Reserves, Local Wildlife Sites, the Local Nature Recovery Strategy and other priority habitats and species.

33 Do you have views on how the assessment of need for traveller sites should be approached, in order to determine whether a local planning authority should undertake a Green Belt review?

Yes

Please explain your answer:

All the safeguards set out above in our responses to Q23 and Q28 must be implemented. Then only where local need is demonstrated, not a one-size-fits all national method. Because we are in a nature and climate emergency, in any proposals, protection must be given to all SSSI, Local Nature Reserves, Local Wildlife Sites, the Local Nature Recovery Strategy and other priority habitats and species.

34 Do you agree with our proposed approach to the affordable housing tenure mix?

No

Please explain your answer:

Housing need is assessed in categories – Wirral needs many small properties for single people, small single-parent families, older people down-sizing. It needs few large 5-bed homes. Housing target in the Local Plan should therefore not be just a single number, but be broken down into the same categories, with the right for local planning authorities to refuse applications for excess un-needed properties and only approve ones that match the housing need. The market is a slow and poor mechanism for achieving this and will not address the current crisis – indeed it has helped to make the crisis worse, as developers get more profit from a few large houses than from more smaller ones.

35 Should the 50 per cent target apply to all Green Belt areas (including previously developed land in the Green Belt), or should the Government or local planning authorities be able to set lower targets in low land value areas?

The 50% target should apply to all Green Belt areas (including previously developed land in the Green Belt)

Please explain your answer:

If we are to lose Green Belt in Wirral, with high impacts on nature conservation, then the highest possible gains have to be achieved for all life including human. The 50% target should apply to all greenfield sites, in and out of Green Belt, and not be subject to viability arguments.

36 Do you agree with the proposed approach to securing benefits for nature and public access to green space where Green Belt release occurs?

No

Please explain your answer:

We welcome the requirement in the Golden Rules that major development on land released from Green Belt should benefit both communities and nature. Specifically, under paragraph 23c, the requirement for new or improved accessible good quality green spaces within a short walk from homes, is welcome. 'Good quality green space' must include 'naturalistic' infrastructure as there is good evidence that this has more benefits for mental health than a formal area of mown grass. This Golden Rule should apply to all new development, not just on Green Belt, and be used to incorporate areas of brownfield land with high nature conservation value into new developments.

Enabling contact with nature close to where people live could reduce inequalities and visits to health care professionals – saving the National Health Service millions of pounds.

However, the Government should set targets for Access to Natural Green Space that local authorities must achieve, and provide a mechanism to fund care of all local authority-owned greenspace. Targets should include a requirement for all homes (new and existing) to be within five minutes' walk of natural green space, taking into account the routes used to reach such spaces.

In addition, the Golden Rules should require all developments built on land released from Green Belt to go beyond the minimum Biodiversity Net Gain requirement and deliver a 30% gain. This will provide significant benefits for wildlife and people and could make the release of Green Belt and subsequent development more acceptable to existing communities – reducing objections, delays and costs.

Pa 160b. This should say that all new building, (housing, infrastructure and industrial), should be built to as low a carbon cost as possible and should be designed to be zero-carbon in use. Building standards should be changed to this for all planning applications made from 2025.

Pa 164 should add 'providing such applications (for renewable and low carbon development) meet other planning requirements' e.g. effects on nature conservation and restoration, and on food production. For example, solar farms on good food-producing land may not be good for wildlife or food security. Rooftop solar should be specifically encouraged.

Pa 186 should specifically set Biodiversity Net Gain levels at 20%, and for all greenfield land at 30%.

Pa 60. Make Planning Enforcement a statutory service and fund it appropriately, so that planning conditions are actually carried out, including provision for monitoring and enforcement of BNG.

Change 186c to remove reference to 'compensation' – there is no way to 'compensate' for an irreplaceable habitat in human timescales, therefore these should never be destroyed. E.g. an ancient wood needs at least 400 years to develop. Change wording to 'wholly exceptional reasons of national importance'.

37 Do you agree that Government should set indicative benchmark land values for land released from or developed in the Green Belt, to inform local planning authority policy development?

Not Answered

Please explain your answer:

38 How and at what level should Government set benchmark land values?

Please explain your answer:

39 To support the delivery of the golden rules, the Government is exploring a reduction in the scope of viability negotiation by setting out that such negotiation should not occur when land will transact above the benchmark land value. Do you have any views on this approach?

Not Answered

Please explain your answer:

40 It is proposed that where development is policy compliant, additional contributions for affordable housing should not be sought. Do you have any views on this approach?

Please explain your views on this approach:

41 Do you agree that where viability negotiations do occur, and contributions below the level set in policy are agreed, development should be subject to late-stage viability reviews, to assess whether further contributions are required? What support would local planning authorities require to use these effectively?

Not Answered

Please explain your answer, including what support you consider local authorities would require to use late-stage viability reviews effectively:

42 Do you have a view on how golden rules might apply to non-residential development, including commercial development, travellers sites and types of development already considered 'not inappropriate' in the Green Belt?

Yes

Please explain your answer:

As we said in response to Q20, Q23 and Q28, stronger environmental policies are needed for all Green Belt development, to protect and restore nature, safeguard food production and restore ecosystem services. Because we are in a nature and climate emergency, in any proposals, protection must be given to all SSSI, Local Nature Reserves, Local Wildlife Sites, the Local Nature Recovery Strategy and other priority habitats and species.

43 Do you have a view on whether the golden rules should apply only to 'new' Green Belt release, which occurs following these changes to the NPPF? Are there other transitional arrangements we should consider, including, for example, draft plans at the regulation 19 stage?

Yes

Please explain your answer:

We have been working as a Wildlife Trust group on Wirral's Local Plan for over 10 years. Wirral's Unitary Development Plan was approved in 2000 and is woefully out of date. We need our new Local Plan in place to provide all sorts of policies unrelated to housing demand, and it must not be held up again by these changes in policy, that do not consider local need, jobs, geography, nature restoration or climate change. Our Local Plan has already been delayed by the activities of developers, especially Leverhulme Estates, who delayed its examination in 2023, and this disruption to the democratic process must NOT be allowed to succeed, or it will set a very bad precedent for the whole country. Reviewing Green Belt at this point would benefit of only a few wealthy landowners and derail the regeneration of east Wirral and the provision of proper Social Housing to meet local need.

44 Do you have any comments on the proposed wording for the NPPF (Annex 4)?

Yes

Please explain your answer:

Surely Appx 4, #3 should read 'and LOWER levels of affordable housing should not be sought on the grounds of viability.' Our problem is developers claiming they cannot build affordable or social housing because of viability issues.

45 Do you have any comments on the proposed approach set out in paragraphs 31 and 32?

Not Answered

Please explain your answer:

46 Do you have any other suggestions relating to the proposals in this chapter?

Not Answered

Please explain your answer:

Chapter 6 – Delivering affordable, well-designed homes and places

47 Do you agree with setting the expectation that local planning authorities should consider the particular needs of those who require Social Rent when undertaking needs assessments and setting policies on affordable housing requirements?

Yes

Please explain your answer:

Yes. The definition of Affordable homes needs changing. 80% of market value of a £300,000 new house built on Green Belt land and requiring a car for access (as Leverhulme Estates proposed) is not affordable to Wirral's 1000 people in dire housing need, nor the poorly-housed. Social housing close to existing jobs, transport, nature and other good quality greenspace, medical facilities, schools, etc is what is needed. Affordability should be set at a level related to local incomes and the Living Wage.

48 Do you agree with removing the requirement to deliver 10% of housing on major sites as affordable home ownership?

Not Answered

Please explain your answer:

49 Do you agree with removing the minimum 25% First Homes requirement?

Not Answered

Please explain your answer:

50 Do you have any other comments on retaining the option to deliver First Homes, including through exception sites?

Not Answered

Please provide any further comments:

51 Do you agree with introducing a policy to promote developments that have a mix of tenures and types?

Not Answered

Please explain your answer:

52 What would be the most appropriate way to promote high percentage Social Rent/affordable housing developments?

Please explain your answer:

53 What safeguards would be required to ensure that there are not unintended consequences? For example, is there a maximum site size where development of this nature is appropriate?

Please explain your answer:

54 What measures should we consider to better support and increase rural affordable housing?

Please explain your answer:

55 Do you agree with the changes proposed to paragraph 63 of the existing NPPF?

Not Answered

Please explain your answer:

56 Do you agree with these changes?

Not Answered

Please explain your answer:

57 Do you have views on whether the definition of 'affordable housing for rent' in the Framework glossary should be amended? If so, what changes would you recommend?

Yes

If Yes, what changes would you recommend?:

The definition of "affordable housing for rent" should be amended. 80% of market value of a new house built on Green Belt land and requiring a car for access (as Leverhulme Estates proposed) is not affordable to Wirral's 1000 people in dire housing need, nor the poorly-housed. Social housing close to existing jobs, transport, nature and other good quality greenspace, medical facilities, schools, etc is what is needed. Affordability should be set at a level related to local incomes and the Living Wage. Without a changed definition of affordable housing, 'affordable' rents as high as 80% of market rents will continue to be delivered at the expense of social housing need. This will exacerbate, not resolve the housing crisis and in the process add to the climate and nature emergencies.

58 Do you have views on why insufficient small sites are being allocated, and on ways in which the small site policy in the NPPF should be strengthened?

Not Answered

Please explain your answer :

59 Do you agree with the proposals to retain references to well-designed buildings and places, but remove references to 'beauty' and 'beautiful' and to amend paragraph 138 of the existing Framework?

Not Answered

Please explain your answer:

60 Do you agree with proposed changes to policy for upwards extensions?

Not Answered

Please explain your answer:

61 Do you have any other suggestions relating to the proposals in this chapter?

Not Answered

Please explain your answer:

Chapter 7 – Building infrastructure to grow the economy

62 Do you agree with the changes proposed to paragraphs 86 b) and 87 of the existing NPPF?

Yes

Please explain your answer:

As with all development, there must be a Local Plan led approach, underpinned by national spatial planning of land use, considering nature restoration, housing, infrastructure, energy, water and other needs.

63 Are there other sectors you think need particular support via these changes? What are they and why?

Yes

Please explain your answer:

6. Economy

Industry: Pa 84 or 85 should include provision for the necessary energy infrastructure for decarbonisation e.g. electricity substations, and encourage on-site power generation wherever possible. Taking nature-rich areas or good quality farmland for power production is not sensible in a climate and nature emergency. Rooftop solar should be supported as it does not take additional land.

17. Sustainable use of materials

Pa 221 Oil, coal and gas exploration:

Because of the climate impacts of these materials, this should be changed to say that such applications should normally be refused. The International Institute for Sustainable Development and University College London have found that existing fossil fuel projects are sufficient to meet anticipated global energy demands in the transition period to net zero by 2050. Recent court cases (e.g. Horse Hill, Surrey) have established that any such applications have to consider the climate impact of using the fuels extracted as well as the process of extraction.

Annex 1: all plans that have reached examination in public and found basically sound i.e. after Regulation 19, should be approved asap. Studies on real housing need in that area should commence as soon as the Local Plan is approved. Wirral's UDP was approved in 2000 and is woefully out of date. We need our new Local Plan in place to provide all sorts of policies unrelated to housing demand, and it must not be held up again by these changes in policy that do not consider local need, jobs, geography, nature restoration or climate change. Our Local Plan has already been delayed by the activities of developers, especially Leverhulme Estates, who delayed its examination in 2023, and this disruption to the democratic process must not be allowed to succeed, or it will set a very bad precedent for the whole country. Reviewing Green Belt at this point would benefit of a few wealthy landowners only and derail the regeneration of east Wirral and the provision of proper Social Housing to meet local need.

Appx 2. Affordable homes. The definition needs changing. 80% of market value of a £300,000 new house built on Green Belt land and requiring a car for access (as Leverhulme Estates proposed) is not affordable to Wirral's 1000 people in dire housing need, nor the poorly-housed. Social housing close to existing jobs, transport, nature and other good quality greenspace, medical facilities, schools, etc is what is needed. Affordability should be set at a level related to local incomes and the Living Wage.

64 Would you support the prescription of data centres, gigafactories, and/or laboratories as types of business and commercial development which could be capable (on request) of being directed into the NSIP consenting regime?

Not Answered

Please explain your answer:

65 If the direction power is extended to these developments, should it be limited by scale, and what would be an appropriate scale if so?

Not Answered

If Yes, what would be an appropriate scale? :

66 Do you have any other suggestions relating to the proposals in this chapter?

Not Answered

Please explain your answer:

Chapter 8 – Delivering community needs

67 Do you agree with the changes proposed to paragraph 100 of the existing NPPF?

Not Answered

Please explain your answer:

68 Do you agree with the changes proposed to paragraph 99 of the existing NPPF?

Not Answered

Please explain your answer:

69 Do you agree with the changes proposed to paragraphs 114 and 115 of the existing NPPF?

Yes

Please explain your answer:

Yes. We support new pa 112. Add to text that all developments must consider the climate impacts of their generated transport, and explain how net-zero transport can be achieved. If a development would be heavily car-dependant and remote from facilities, then a better location should be sought.

70 How could national planning policy better support local authorities in (a) promoting healthy communities and (b) tackling childhood obesity?

Please explain your answer:

Good quality naturalistic greenspace within easy reach is key to tackling these.

Government should:

Set targets for Access to Natural Green Space that local authorities must achieve. Provide funding streams to support this and care for existing greenspace! These should include a requirement for all homes (new and existing) to be within fifteen minutes' walk of natural green space, taking into account the routes used to reach such spaces. This should apply to existing homes as well as new builds.

Local Nature Recovery Strategies should be used to identify where better access to nature is needed so that investment can be effectively targeted.

A duty should be placed upon local authorities to develop, implement and monitor a local Green and Blue Infrastructure Strategy, informed by the Local Nature Recovery Strategy, that provides a network for nature's recovery through and beyond the urban area and connects people with nature in their daily lives. All public bodies should be required to contribute to the delivery of the local Green and Blue Infrastructure Strategy.

Developments should contribute to the local Green and Blue Infrastructure Strategy by including:

- o greenspace, managed to increase wildlife
- o improved access to nature for surrounding communities as part of the infrastructure levy
- o connected green walking and cycling routes linked to decarbonised public transport, local amenities and schools to provide everyday access to nature.

71 Do you have any other suggestions relating to the proposals in this chapter?

Not Answered

Please explain your answer:

Chapter 9 – Supporting green energy and the environment

72 Do you agree that large onshore wind projects should be reintegrated into the NSIP regime?

Yes

Please explain your answer:

Reducing energy demand through energy efficiency measures should be the priority, but we recognise as part of our efforts to address climate change in the UK, it is vitally important to maximize renewable energy generation.

Planning policy and decisions on large scale onshore wind projects should be delivering net zero and nature's recovery and ensure:

- Projects avoid negative impacts on designated sites, including Local Wildlife Sites.
- Projects are not permitted on peatland habitats. Peat stores a huge amount of carbon.

- Projects avoid negative impacts on areas identified as high priority for nature restoration or where harm is likely to be caused to populations of vulnerable, threatened and endangered species
- An ambitious approach to mandatory Biodiversity Net Gain

All major on-shore windfarms should provide a minimum of 20% biodiversity net gain to support targeted delivery of nature's recovery, informed by the Local Nature Recovery Strategy or equivalent

73 Do you agree with the proposed changes to the NPPF to give greater support to renewable and low carbon energy?

No

Please explain your answer:

Reducing energy demand through energy efficiency measures should be the priority, but we recognise as part of our efforts to address climate change in the UK, it is vitally important that we maximize renewable energy generation (including electricity from onshore wind) to meet our needs, phase out fossil fuel use and provide a low carbon and more sustainable approach into the future.

Industry: Pa 84 or 85 should include provision for the necessary energy infrastructure for decarbonisation e.g. electricity substations, and encourage on-site power generation wherever possible. Taking nature-rich areas or good quality farmland for power production is not sensible in a climate and nature emergency. Rooftop solar should be supported as it does not take additional land.

74 Some habitats, such as those containing peat soils, might be considered unsuitable for renewable energy development due to their role in carbon sequestration. Should there be additional protections for such habitats and/or compensatory mechanisms put in place?

Yes

Please explain your answer:

Renewable energy projects such as Windfarms should not be built on peatland habitats. Peat is an important, irreplaceable habitat that plays a vital role in sequestering carbon as long as it is kept wet. Renewable energy projects must therefore also not affect the hydrology of peatlands so that they risk drying out as the climate changes.

75 Do you agree that the threshold at which onshore wind projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50 megawatts (MW) to 100MW?

Not Answered

Please explain your answer:

76 Do you agree that the threshold at which solar projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50MW to 150MW?

Not Answered

Please explain your answer:

77 If you think that alternative thresholds should apply to onshore wind and/or solar, what would these be?

Please explain your answer:

78 In what specific, deliverable ways could national planning policy do more to address climate change mitigation and adaptation?

Please explain your answer:

Planning policy should:

* Recognize and consider in all proposals the effects on the linked crises of climate change and nature loss. Proposals that would negatively affect nature or climate should be refused unless there are very special circumstances.

* We need a national Land Use Framework to guide decisions on land use which address the nature and climate crisis together alongside energy infrastructure, food supply, water, transport, business infrastructure, amenity and housing.

* Local Plans, policies and decisions on housing and infrastructure should be informed by Local Nature Recovery Strategies incorporating maps which provide an understanding of where nature exists and where it needs to be better protected, restored and created for the future. These should be given much stronger weight in the planning system.

* Clear and explicit policy in the NPPF on the application of the planning mitigation hierarchy at all planning and decision-making levels.

* Stronger protection for internationally, nationally and locally designated sites, irreplaceable habitats and priority habitats & species – including specific protection policies for Local Wildlife Sites in the NPPF.

* All developments (including permitted development and NSIPs) to go beyond the statutory minimum and achieve at least 20% Biodiversity Net Gain (30% for New Towns and green field developments).

* Development should integrate green infrastructure within the design including high quality, accessible natural green spaces to create climate resilience, vital wildlife habitat and many community benefits.

* Planning policy should give greater priority to improving, modernising and repurposing existing homes, buildings and estates. Constructing new builds can produce ten times more CO2 than refurbishment and consumes more land which might otherwise be used to support nature's recovery and climate adaptation.

* Homes and commercial properties (new and retrofit) should be designed and built to the best net zero standards, with minimal embodied carbon and

high energy efficiency. This will help tackle the climate crisis, contribute to energy security and reduce household and business bills.

* All new buildings should be water efficient, as water supply will be important to climate change mitigation and adaptation.

Development design should incorporate sustainable urban drainage, swales and rain gardens to reduce surface water flooding and provide wildlife habitat

The current issue of domestic wastewater adding to the problem of nutrient pollution of water courses, coastal waters and protected wetland sites, must be addressed.

79 What is your view of the current state of technological readiness and availability of tools for accurate carbon accounting in plan-making and planning decisions, and what are the challenges to increasing its use?

Please explain your answer:

80 Are any changes needed to policy for managing flood risk to improve its effectiveness?

Yes

Please explain your answer:

Adhere to Government agency advice given by a properly funded and resourced Environment Agency, to stop building in unsustainable places.

Use Natural Flood Management and Sustainable Drainage Systems (SuDS). Statutory national SuDS standards should be provided to all Local Planning Authorities / SuDS Approval Bodies to assist with the determination of planning applications

81 Do you have any other comments on actions that can be taken through planning to address climate change?

Not Answered

Please explain your answer:

82 Do you agree with removal of this text from the footnote?

Not Answered

Please explain your answer:

83 Are there other ways in which we can ensure that development supports and does not compromise food production?

Yes

Please explain your answer:

Expand the definition of Best and Most Versatile agricultural land to include all Grade 3 land, as the difference between 3a and 3b is difficult and many areas of Grade 3 land have not been assessed for 3a/3b status. We need to protect land that could become important for food security in a changing world, when we will not be able to import half our food.

Ensure larger developments include land for community gardens, allotments or similar. Small scale growers produce a high amount of food per land area, use fewer pesticides and artificial fertilisers, and therefore support more wildlife than urban greenspace or usual horticulture and agriculture.

84 Do you agree that we should improve the current water infrastructure provisions in the Planning Act 2008, and do you have specific suggestions for how best to do this?

Not Answered

Please explain your answer:

85 Are there other areas of the water infrastructure provisions that could be improved? If so, can you explain what those are, including your proposed changes?

Not Answered

Please explain your answer:

86 Do you have any other suggestions relating to the proposals in this chapter?

Not Answered

Please explain your answer:

Chapter 10 – Changes to local plan intervention criteria

87 Do you agree that we should we replace the existing intervention policy criteria with the revised criteria set out in this consultation?

No

Please explain your answer:

These proposals could destroy local democracy and the voluntary nature conservation sector in Wirral. We have worked hard to inform and support Wirral's Local Plan and this will all be wasted if impossible housing targets are imposed in Wirral by national government. We are all volunteers but giving professional level expertise to this. The knowledge of local stakeholders is a vital element of the planning process that helps to minimise damage to the natural environment and make developments more acceptable to communities – helping to reduce delays and costs. If these targets are imposed, with bad effects on nature in Wirral, why should we ever trust any government or democratic process again? Nature conservation and restoration in England relies on the volunteer time of many expert volunteers. Why should we spend that time only to see an ill-considered policy negate it all? Just think what local government would have to pay for nature conservation advice if there was no voluntary sector.

Any Local Plan that has reached Regulation 19 should be passed asap and revisions considered afterwards. Every effort must be made to reduce delays to Local Plans, including avoiding effects of ill-considered national Government interventions.

Taking a blanket approach to housing number is wrong, and should be thought about more carefully and revised to feature local need, geography, income and jobs, population age structure, and other local conditions. The wrong housing in the wrong place will not address the housing crisis.

The planning system must consider, at every stage, the climate and nature crisis, and how best to address it. Nature must be conserved and restored if the human species is to survive.

88 Alternatively, would you support us withdrawing the criteria and relying on the existing legal tests to underpin future use of intervention powers?

Not Answered

Please explain your answer:

Chapter 11 – Changes to planning application fees and cost recovery for local authorities related to Nationally Significant Infrastructure Projects

89 Do you agree with the proposal to increase householder application fees to meet cost recovery?

Not Answered

Please explain your answer:

90 If you answered No to question 89, do you support increasing the fee by a smaller amount (at a level less than full cost recovery) and if so, what should the fee increase be? For example, a 50% increase to the householder fee would increase the application fee from £258 to £387.

Not Answered

If Yes, please explain in the text box what you consider an appropriate fee increase would be. :

91 If we proceed to increase householder fees to meet cost recovery, we have estimated that to meet cost-recovery, the householder application fee should be increased to £528. Do you agree with this estimate?

Not Answered

If No, please explain in the text box below and provide evidence to demonstrate what you consider the correct fee should be.:

92 Are there any applications for which the current fee is inadequate? Please explain your reasons and provide evidence on what you consider the correct fee should be.

Not Answered

Please explain your answer:

93 Are there any application types for which fees are not currently charged but which should require a fee? Please explain your reasons and provide evidence on what you consider the correct fee should be.

Not Answered

Please explain your reasons and provide evidence on what you consider the correct fee should be:

94 Do you consider that each local planning authority should be able to set its own (non-profit making) planning application fee?

Not Answered

Please explain your answer:

95 What would be your preferred model for localisation of planning fees?

Not Answered

Please give your reasons in the text box below:

96 Do you consider that planning fees should be increased, beyond cost recovery, for planning applications services, to fund wider planning services?

Yes

If Yes, please explain what you consider an appropriate increase would be and whether this should apply to all applications or, for example, just applications for major development? :

Over the past decade, both local authorities and environmental statutory consultees have faced huge resourcing challenges due to funding decisions made by successive Governments. It is good to see this consultation recognising the importance of resourcing local planning authorities appropriately so they can provide a high-quality planning service and timely decisions. Systems designed to protect nature can only work well and swiftly if there are sufficient people and expertise in place to implement and enforce them.

An increase should apply to all applications (all but the smallest have to be assessed for Biodiversity Net Gain, which requires new expertise in planning departments)

97 What wider planning services, if any, other than planning applications (development management) services, do you consider could be paid for by planning fees?

Please explain your answer:

Planning enforcement should be made a statutory service and adequately funded, as currently many planning conditions are ignored e.g. fencing round retained trees to protect the root zone. Inspection of landscaping should be made a duty for the building inspectors (with suitable training) as landscaping is frequently not carried out as specified. Biodiversity Net Gain is meant to be monitored and action enforced if the habitat creation does not meet requirements. This must be adequately enforced, including supporting training for ecologists to design and monitor habitat creation schemes.

98 Do you consider that cost recovery for relevant services provided by local authorities in relation to applications for development consent orders under the Planning Act 2008, payable by applicants, should be introduced?

Not Answered

99 If Yes, please explain any particular issues that the Government may want to consider, in particular which local planning authorities should be able to recover costs and the relevant services which they should be able to recover costs for, and whether host authorities should be able to waive fees where planning performance agreements are made.

Please explain your answer:

100 What limitations, if any, should be set in regulations or through guidance in relation to local authorities' ability to recover costs?

Please explain your answer:

101 Please provide any further information on the impacts of full or partial cost recovery are likely to be for local planning authorities and applicants. We would particularly welcome evidence of the costs associated with work undertaken by local authorities in relation to applications for development consent.

Please explain your answer :

102 Do you have any other suggestions relating to the proposals in this chapter?

Not Answered

Please explain your answer.:

Chapter 12 – The future of planning policy and plan making

103 Do you agree with the proposed transitional arrangements? Are there any alternatives you think we should consider?

Not Answered

Please explain your answer:

104 Do you agree with the proposed transitional arrangements?

Not Answered

Please explain your answer:

105 Do you have any other suggestions relating to the proposals in this chapter?

Not Answered

Please explain your answer:

Chapter 13 – Public Sector Equality Duty

106 Do you have any views on the impacts of the above proposals for you, or the group or business you represent and on anyone with a relevant protected characteristic? If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how. Is there anything that could be done to mitigate any impact identified?

Please explain your answer:

These proposals if implemented without better thought could destroy local democracy and the voluntary nature conservation sector in Wirral. We have worked hard to inform and support Wirral's Local Plan and this will all be wasted if impossible housing targets are imposed in Wirral by national government. We are all volunteers but giving professional level expertise to this. The knowledge of local stakeholders is a vital element of the planning process that helps to minimise damage to the natural environment and make developments more acceptable to communities – helping to reduce delays and costs. If these targets are imposed, with bad effects on nature in Wirral, why should we ever trust any government or democratic process again? Nature conservation and restoration in England relies on the volunteer time of many expert volunteers. Why should we spend that time only to see an ill-considered policy negate it all? Just think what local government would have to pay for nature conservation advice if there was no voluntary sector. Any Local Plan that has reached Regulation 19 should be passed asap and revisions considered afterwards. Every effort must be made to reduce delays to Local Plans, including avoiding effects of ill-considered national Government interventions.

Taking a blanket approach to housing number is wrong, and should be thought about more carefully and revised to feature local need, geography, income and jobs, population age structure, and other local conditions. The wrong housing in the wrong place will not address the housing crisis. The planning system must consider, at every stage, the climate and nature crisis, and how best to address it. Nature must be conserved and restored if the human species is to survive.

Chapter 14 – Table of questions

Chapter 15 – About this consultation