



ENGLISH HERITAGE

NORTH WEST

Lynn Evans

Our Ref:

Your Ref:

Date: 9th July 2013

Dear Lynn,

Neighbourhood Plan for Devonshire Park

Thank you for consulting English Heritage about your Neighbourhood Plan.

We welcome that the Neighbourhood Plan recognises the importance of local character and makes an assessment of townscape, built form, historical development, open spaces and materials to highlight the uniqueness of the area. The Neighbourhood Plan also contains a positive strategy for the conservation, enhancement and enjoyment of the historic environment, which is a requirement of the National Planning Policy Framework (NPPF). The Plan would benefit from reference to any designated heritage assets together with their listing, in this case the Church of St Joseph (Grade II).

We consider that the planning and conservation team at Wirral MBC are best placed to assist you in the development of your Draft Neighbourhood Plan and, in particular, how the strategy might address the area's heritage assets.

We would also advise you to contact the staff at your County archaeological advisory service who look after the Historic Environment Record. They should be able to provide details of not only any designated heritage assets but also locally important buildings, archaeological remains and landscapes. Some Historic Environment Records may also be available on-line via the Heritage Gateway (www.heritagegateway.org.uk). It may also be useful to involve local voluntary groups such as the local Civic Society or local historic groups in the production of your Neighbourhood Plan.

English Heritage has produced a number of documents, which your community might find helpful in helping to identify what it is about your area, which makes it distinctive, and how you might go about ensuring that the character of the area is retained. These can be found at <http://www.helm.org.uk/neighbourhood-planners/>.

SUITES 3.3 AND 3.4 CANADA HOUSE 3 CHEPSTOW STREET MANCHESTER M1
6FW

Telephone 0161 242 1400 Facsimile 0161 242 1401
www.english-heritage.org.uk

Please note that English Heritage operates an access to information policy.
Correspondence or information which you send us may therefore become publicly
available

 Stonewall
EQUALITY CHARITY

We also have a dedicated website that covers a number of issues. You may also find the advice in "*Planning for the Environment at the Neighbourhood Level*" useful. This has been produced by English Heritage, Natural England, the Environment Agency and the Forestry Commission. As well as giving ideas on how you might improve your local environment, it also contains some useful further sources of information. This can be downloaded from:

<http://a0768b4a8a31e106d8b0-50dc802554eb38a24458b98ff72d550b.r19.cf3.rackcdn.com/geho0212bwaz-e-e.pdf>

If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely,

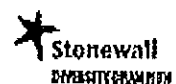
E. Hrycan

Emily Hrycan
Historic Environment Planning Adviser (North West)
English Heritage

SUITES 3.3 AND 3.4 CANADA HOUSE 3 CHEPSTOW STREET MANCHESTER M1
5FW

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www.english-heritage.org.uk

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Correspondence or information which you send us may therefore become publicly available





Devonshire Park Draft Neighbourhood Plan

2 messages

Mon, Jul 8, 2013 at 3:11 PM

Dear Lynn

Thank you for consulting us over the Draft Neighbourhood Plan for Devonshire Park. Our concern is with wildlife, namely the birds and bats living in your area. As such, I am pleased to support Aim 4: protection of the environment through conservation of trees, walled gardens and green spaces. This is particularly important as the area has no formal area of public landscaping or greenspace (7.16) and only a very small green area round St Joseph's church.

I am therefore pleased to support the two proposed policies, as likely to lead to the retention, or where necessary restoration, of the gardens and treescape.

Yours sincerely

Dr Hilary J Ash

Hon Conservation Officer
Wirral Wildlife
the Wirral Group of Cheshire Wildlife trust



Hazardous Installations Directorate

Allison Chippendale

Chemicals, Explosives &
Microbiological Hazards Division
(CEMHD)
2.2 Redgrave Court
Merton Road
BOOTLE
Merseyside L20 7HS

Devonshire Park Neighbourhood Planning Forum

Date 08 July 2013

Reference HID/AJC/JM

<http://www.hse.gov.uk/>

Maureen Alderdice

For the attention of LYNN EVANS - CHAIR

Dear Ms Evans

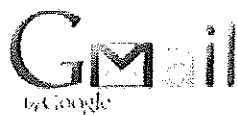
**CONSULTATION OF YOUR NEIGHBOURHOOD PLAN – REPRESENTATIONS BY HSE
DEVONSHIRE PARK NEIGHBOURHOOD PLAN**

Thank you for your request to provide a representation on the Devonshire Park Neighbourhood Plan consultation document. When consulted on land-use planning matters, the HSE where possible will make representations to ensure that compatible development with the consultation zones of major hazard installations and major accident hazard pipelines (MAHPs) is achieved.

We have concluded that we have no representation to make on this occasion. This is because the neighbourhood plan area shown in your consultation document does not encroach on the consultation zones of major hazard installations or MAHPs. Therefore the HSE does not need to be informed of the next stages in the adoption of the Devonshire Park Neighbourhood Plan.

Yours sincerely

Allison Chippendale
Administration Officer



Draft Devonshire Park Neighbourhood Plan consultation - response from National Trust

1 message

Wed, Jul 3, 2013 at 10:47 AM

Dear Ms. Evans,

Thank you for your letter of 29th May notifying National Trust of the above consultation.

I can advise you that National Trust has no particular observations that it wishes to make in response to the consultation.

Kind regards,

Alan Hubbard

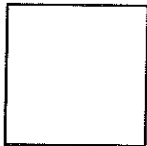
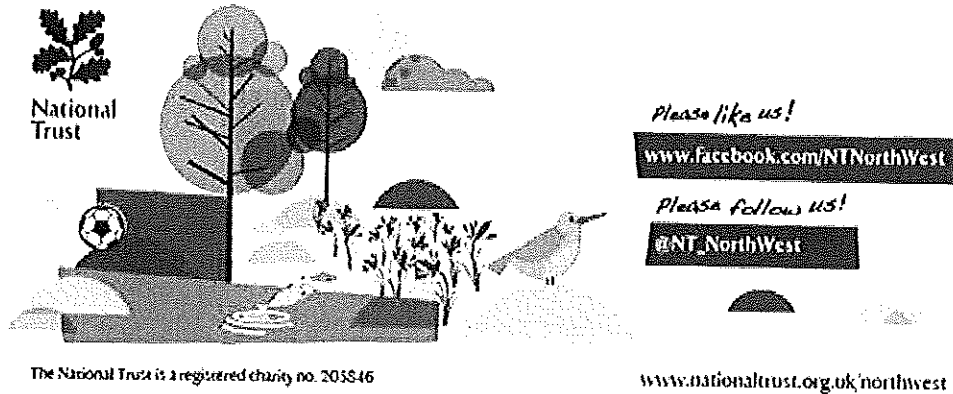
Planning Adviser

t National Trust

61 Oxford Street

MANCHESTER

M1 6EQ



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Date: 11th July 2013
Our ref: 88205



By e-mail:

Natural England
Consultation Service
Hornbeam House
Electra Way
Crewe Business Park
CREWE
CW1 6GJ

Dear Ms Evans

Devonshire Park Draft Neighbourhood Plan

Thank you for consulting us on the above which was received by Natural England on 3 June 2013.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made. Natural England does not have the resources to get involved in all neighbourhood plans and will prioritise our detailed engagement to those plans that may impact on internationally or nationally designated nature conservation sites, and/or require Strategic Environmental Assessment or screening for Habitats Regulations Assessment.

Natural England does not consider that this plan poses any likely significant risk to internationally or nationally designated nature conservation sites and so does not wish to make specific comments on the neighbourhood plan.

The following is offered as advice to assist the Town/Parish Council or Neighbourhood Forum.

Natural England, together with the Environment Agency, English Heritage and Forestry Commission has published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at:

<http://publications.environment-agency.gov.uk/PDF/GEHO0212BWAZ-E-E.pdf>

Natural England
Foundry House
3 Millsands
Riverside Exchange
Sheffield S3 8NH

www.naturalengland.org.uk

Local environmental record centres hold a range of information on the natural environment. A list of local records centre is available at:

<http://www.nbn-nfbr.org.uk/nfbr.php>

Protected species

You should consider whether your plan has any impacts on legally protected species. To help you do this, Natural England has produced standing advice to help understand the impact of particular developments on protected or Biodiversity Action Plan species should they be identified as an issue. The standing advice also sets out when, following receipt of survey information, you should undertake further consultation with Natural England.

<http://www.naturalengland.org.uk/ourwork/planningtransportlocalgov/spatialplanning/standingadvice/default.aspx>

Opportunities for enhancing the natural environment

Neighbourhood plans may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably and bring benefits for the local community, for example through green space provision and access to and contact with nature.

Opportunities to incorporate features into new build or retro fitted buildings which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes should also be considered as part of any new development proposal.

The lack of detailed comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may make comments that will help the Parish/Town Council or Neighbourhood Forum to fully take account of the natural environment in the plan-making process.

If, as you develop your plan, you consider that it will significantly impact on designated nature conservation sites or protected species or has other significant impacts on the natural environment then you should consult Natural England again.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

If I can provide any further advice relating to this consultation, please do not hesitate to contact me. For all other correspondence, please contact the address above.

Yours sincerely

Kate Wheeler
Lead Adviser
Land Use Operations



Our ref: HA/SE/NP001
Your ref:

Steve Eccles
Asset Manager
8th Floor
Piccadilly Gate
Store Street
Manchester M1 2WD

Devonshire Park Neighbourhood Planning Forum

7th June 2013

For the attention of Lynn Evans, Chair

Dear Ms Evans,

**DEVONSHIRE PARK NEIGHBOURHOOD PLANNING FORUM
CONSULTATION DRAFT NEIGHBOURHOOD PLAN FOR DEVONSHIRE PARK**

Thank you for your letter dated 29th May 2013 inviting the Highways Agency (HA) to comment on the draft Neighbourhood Plan for Devonshire Park.

The HA is responsible for most of England's motorways and some major A roads, this is known as the Strategic Road Network (SRN).

The HA has taken a keen interest in the development of neighbourhood plans and has assessed any possible impact that the implementation of these plans could have on the SRN. As Devonshire Park is some 3 kilometres from the M53 motorway it is not anticipated that implementation of the plan will have any significant impact on the SRN. Therefore, in this respect the HA has no specific comments to make.

The HA however, welcomes the Forum's aim of maintaining a sustainable neighbourhood and wishes it every success in the delivery of this aim.

Yours sincerely

Steve Eccles
NDD North West Asset Development

cc: Dave Clark HA
Bob Baldwin HA

**Devonshire Park Neighbourhood
Planning Forum**

Our ref: SO/2006/000255/OR-
04/IS2-L01
Your ref:

Date: 18 July 2013

FAO Lynn Evans

Dear Madam

**DEVONSHIRE PARK NEIGHBOURHOOD PLANNING FORUM – CONSULTATION
DRAFT NEIGHBOURHOOD PLAN FOR DEVONSHIRE PARK**

Thank you for forwarding the above plan for comment which was received in this office
3rd June 2013.

We have no comments to make at this time.

Yours faithfully

**Mr Stephen Sayce
Planning Liaison Officer**

cc Ms Lynn Evans



Devonshire Park Draft Neighbourhood Plan1 message

Mon, Jun 3, 2013 at 2:38
PM

Dear Lynn,

Thank you for your letter to the Merseyside Archaeological Service dated 29 May 2013. Unfortunately the service no longer exists, full details are here <http://www.liverpoolmuseums.org.uk/mol/collections/historic-environment-record/merseyside-archaeological-service.aspx> , and NML no longer provides advice of the type requested.

Best Wishes,

Mark Adams

Mark Adams
Senior Archaeological Project Officer
National Museums Liverpool

www.liverpoolmuseums.org.uk

Gift ideas and treats for yourself in our online shop.

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National Museums Liverpool, Museum of Liverpool - Archaeology, Dock Traffic Office, Albert Dock, Liverpool, L3 4AX United Kingdom



Devonshire Park - Neighbourhood Plan

1 message

Thu, Jun 6, 2013 at 8:52 AM

Good morning,

Thank you for the notification of the above draft document.

Please note that my contact details have now changed and are as stated in my electronic signature below.

Many thanks,



Trading Property

5th Floor

1 Angel

Square

Annette Elliott

Manchester

Research Manager

M60 0AG

Website: www.co-operative.coop



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Mr P Berkley
Berkley Partnership
1-3 Beech Mount
Liverpool
L7 0HL

10 July 2013

Lynn Evans

by post and e mail:

Dear Ms Evans,

Devonshire Park Neighbourhood Plan 2013 -2028: Public Consultation

I refer to the above Devonshire Park Neighbourhood Plan published for consultation with a request for comments and representations to be received by 26 July 2013.

I own a large vacant property, 17-21 Rocky Bank Road, Birkenhead, CH42 7LB. As you will be aware for over 7 years I have endeavoured to secure planning permission to bring this property back to productive use.

I appreciate but cannot quite comprehend why there has been such relentless opposition to successive proposals for the conversion of the building. It does not serve any benefit for the building to remain vacant in my view.

I can well understand that local people do not want an over proliferation of HMOs. It seems to me there are perfectly sound planning controls in place to prevent this. However, I would be critical of your proposals put forward in the Neighbourhood Plan which classifies apartment and HMOs as one and the same category of development.

The legal position is that they are in separate use classes. A Neighbourhood Plan which does not recognise this distinction is in my view fundamentally flawed.

The proposed policies for adoption are blunt instruments which will prevent reasonable developments satisfying local standards from taking place.

Wirral Councils' Core Strategy encourages the re-use of vacant buildings and regards these opportunities as the first priority. Its policies for encouraging regeneration do not appear to feature in the Neighbourhood Plan. It is my understanding that a Neighbourhood Plan must comply with the local development plan.

My professional representatives have in the past met with officers of your Association. I was disappointed not to receive a direct notification of the publication of the Neighbourhood Plan as a stakeholder whose interest in the area is as valid as any other resident. I also noted that you were quoted in a local newspaper in February saying it was your intention to meet with the owner. I have received no such contact and this rather condemns your plan as lacking inclusivity.

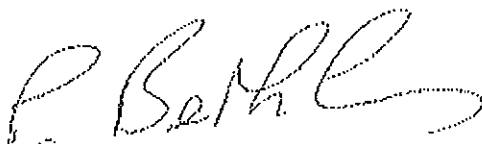
I am critical of the plan which defines the boundary of the Neighbourhood Plan area which appears on page 18 of the document. There are no street names. It is difficult to identify properties and gain an understanding of context. This devalues and weakens the public consultation process and is matter you may wish to reflect on.

I also have a criticism that there is no information as to whom or where hard copy representations should be addressed/submitted.

I would appreciate if you would acknowledge receipt of this letter and fully take into account the representations herewith submitted.

Yours sincerely

Peter Berkley



Devonshire Park neighbourhood Planning Forum – Consultation on the Draft Neighbourhood Plan for Devonshire Park

Response from The Wirral Society

The Society is grateful for the opportunity to comment on the above document.

Firstly, the Society would like to place on record its appreciation of the Forum's efforts in preparing this Draft Plan. We also recognise this, in turn, flows from the good preparatory work undertaken by the Devonshire Park Residents' Association and the work that it undertakes more generally for the benefit of the Devonshire Park area, in particular.

Moreover, its stated aspirations to -

- 'establish modes of local co-operation which may be successfully copied elsewhere' (Para 5) and
 - 'conserve and enhance the fabric and architectural features ...of Devonshire Park' (Para 6)
- are especially to be commended.

The Society's Comments

1. The suite of documents were, in our view, well presented and clearly written. Our only real criticism, were that the generic map included in the main document was too small and un-annotated to be of any practical use. The inclusion of some photographs to re-enforce some points made in the text would also have been beneficial.

The Society would wish to add its support to the Forum in respect of -

2. Policy DP1,
 - a) which sets out it wish that those houses currently in multi-occupancy be returned to single occupancy, wherever this is possible, and also -
 - b) that open frontages to properties should not be permitted, and
 - c) any new properties should fit in / complement and where possible, enhance, neighbouring properties
3. Policy DP2, which sets out its desire to seek an end to the conversion of properties currently in single occupancy. into multi-occupancy properties.

given the evidence described in the Plan

The plan itself seemed to us to be successful in reflecting the main concerns of the many local people who responded to the Questionairre, which was circulated as an Appendix to the Draft Plan

Rod Tann
Chairman

10th July 2013



Developer Services & Planning
Thirlmere House
Lingley Mere Business Park
Lingley Green Avenue
Great Sankey
WARRINGTON
WA5 3LP

planning.liaison@uuplc.co.uk

Your ref
Our ref DC/13/2213
Date 24 July 2013

Lynn Evans (Chair)

Dear Lynn

**Proposal: Devonshire Park Neighbourhood Planning Forum
Consultation Draft Neighbourhood Plan for Devonshire Park**

Thank you for your consultation and seeking our views in this process.

We support growth and sustainable development within the North West and would like to build a strong partnership with you and stakeholders to aid sustainable development and growth.

Our aim is to proactively share our information; assist in the development of sound planning strategies, to identify future development needs and to secure the necessary long-term infrastructure investment.

At this stage we like to make the following specific comments on your draft Neighbourhood Plan and wish to be included in further consultations and where necessary, the further development of your Neighbourhood Plan and any Neighbourhood Development Orders or Community Right to Build Orders

To support the development of your Neighbourhood Plan we would like to highlight the following points:

Water and wastewater infrastructure assets

The major public water supply and wastewater assets servicing your Neighbourhood Area are located outside its boundary.

The wastewater drainage area and water supply zone extend beyond the boundary of your neighbourhood area and provide a service to a number of neighbouring communities.

Any future planning applications relating to these assets [to expand the asset to accommodate growth] will be determined by the Local Planning Authority [Wirral and/or Cheshire West & Cheshire Councils] and your neighbouring communities; therefore to preserve the quality of life, well-being and prosperity of your community, it will be essential to develop common objectives and policies with your surrounding neighbourhood groups and local planning authorities.

Groundwater protection zones

The presence of groundwater source protection zones within your neighbourhood area may restrict the location, type and scale of future developments; this may include the change of use of existing.

Please contact the Environmental Agency for further guidance on groundwater source protection zones.

All of the above will need to be taken into consideration when finalising your Neighbourhood Plan, supporting policies and any Neighbourhood Development Orders or Community Right to Build Orders.

If you wish to discuss this in further detail please do not hesitate in contacting me or Jenny Hope.

Yours sincerely

Dave Sherratt
Local Development Framework Assessor
Developer Services & Planning
United Utilities

Appendices

We would seek your support and would like to see the following comments to be taken into consideration and incorporated into your future policies and/or documents:

Water and wastewater services are vital for the future well-being of your community and the protection of the environment; when developing your future policies you should consider their impacts on the community, environment and ensure infrastructure capacity is available. If infrastructure deficiencies cannot be addressed, an alternative location and/or timescale should be sought where infrastructure capacity is available and it meets your development needs.

National Planning Policy Framework [NPPF]

The presumption in favour of sustainable development

Local Planning Authorities [LPA] should adopt proactive strategy priorities in their Local Plan. This should include strategic policies to deliver:

- the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- the provision of health, security, community and cultural infrastructure and other local facilities; and
- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

Crucially, Local Plans should:

- plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of the NPPF;
- be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;
- be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;
- indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;
- allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;
- identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation;
- identify land where development would be inappropriate, for instance because of its environmental or historic significance; and
- contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified.

Infrastructure

NPPF 162 Local planning authorities should work with other authorities and providers to:

- assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk and coastal change management, and its ability to meet forecast demands; and

- take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.

To ensure key sites and strategic locations are deemed sustainable, plan-led and co-ordinated, strategic solutions should be developed and defined for supporting infrastructure.

An example would be the development of a joint working group [lead by you] that identifies a strategic water supply solution/s for a Neighbourhood Plan; each key site and/or strategic location.

The joint working group will include you; LPA; EA; infrastructure providers; developers; landowners and any other key stakeholders such as Natural England etc.

The aim of the joint working group will be to develop a sustainable strategic drainage solution that:

- protects the existing customer and maintains their service and quality of life;
- protects the environment;
- is a robust and deliverable;
- proactively not reactively delivered;
- meets the needs of not only the Neighbourhood Plan, key sites/strategic locations but also the neighbouring Neighbourhood Groups; LPA; and
- is conditional for future developments within the key site and/or strategic location.

Future development must be sustainable; prevent environmental damage and preserve the quality of life for existing and future generations; therefore, developments should be delayed until infrastructure capacity is available.

We cannot confirm if capacity is available until the connection point/s, flows and completion dates are available.

If additional supporting infrastructure is required then you should work closely with us [and other utility providers] to ensure a sustainable cross-boundary solution is identified and approved by the appropriate Regulators bodies before granting planning approval.

The scale and type of development needs to be defined so the appropriate infrastructure is in place to ensure growth is sustainable.

Where there are capacity issues; any additional developments in these and/or adjoining areas without the appropriate infrastructure solutions being implemented could result in an increased number and frequency of sewer flooding and/or water supply incidents.

You should also consider the constraints [are not limited to, but include] that are outside our control and may influence the timely delivery of supporting infrastructure:

- Regulatory approval
- Environmental constraints
 - Does the receiving watercourse/environment have the capacity to accept additional flows without causing environmental damage?
 - Small river : large development

- Environmental consents and permits
 - Timescales involved in the construction/delivery of new processes to meet new consents and/or permits
- Planning approval
 - Your plan has not highlighted and/or specified land for infrastructure use, therefore future planning applications for future supporting utilities infrastructure may be thwarted or a prolonged process
 - Historical local resistance to the expansion of utilities assets
 - Planning application approval restrictions/conditions delay implementation of supporting infrastructure assets
- Land acquisition
 - Timescales involved in the purchased land needs
 - Land may not be available for expansion due to the encroachment of development
- Access into the highway
 - Limitations from the highway departments for road works
- Environmental restrictions
 - bird breeding and/or nesting seasons; great crested newts; badgers etc.
- Implementation and commissioning restrictions
 - Planning application approval conditions; working hours etc.
 - Environmental consents/permits conditions
 - Its psychical delivery

Water Resources Planning

Our Water Resources Management Plan was published in 2009, and sets out our strategy for water resources management for the next twenty-five years and highlights areas where there is likely to be a supply deficit and what activities will be put in place to mitigate any shortfall in supply.

The plan can be accessed here:

<http://www.unitedutilities.com/WaterResourcesPlan.aspx>

We would encourage all you and developers to contact us at the earliest opportunity to enable identification of points of connection with least cost to the developer.

Increased Water Capacity

The developer is required to pay for their increased capacity (up to the point of a treatment works) and they are only allowed to connect at specific points identified by us and following approval to connect.

You and developer should obtain local capacity information from our Area Teams\Connections who will be able to identify areas where there is current capacity for development; this would be on a case by case basis and developers are required to pay a fee for this service (a pre development enquiry).

General Water Efficiency Guidance

We encourage the use of water efficient designs and development wherever this is possible. There are a number of actions developers can undertake to ensure that their developments are water efficient. The most up to date advice for water efficiency and water efficiency products can be found at Waterwise who have recently published a best practise guide on water efficiency for new developments.

Surface Water

Site drainage; ground conditions; local flooding issues; development layout; design and planning policies should be major considerations for you and developers when selecting possible development sites.

The treatment and processing of surface water [storm water; rainwater] is not a sustainable solution; the sites' current natural discharge solution should be continued and/or mimicked; if the existing surface water does not have an existing or a historical natural solution, we would question the development of a flooded site.

Surfacewater should be managed at source and not transferred; if not this will only transfer the issue to another location; generally to a single pinch point, generating further problems in that location.

Developments must drain on a separate sewerage system, with only foul drainage connected into the foul sewerage network.

Every option should be investigated before discharging surface water into a public sewerage network.

Connecting surface water to the public sewerage network is not a sustainable solution and you should discourage this practice.

The priority options for the management of surface water discharges are:

- Continue and/or mimic the site's current natural discharge process
- Store for later use
- Discharge into infiltration systems located in porous sub soils
- Attenuate flows into green engineering solutions such as ponds; swales or other open water features for gradual release to a watercourse and/or porous sub soils
- Attenuate by storing in tanks or sealed systems for gradual release to a watercourse
- Direct discharge to a watercourse
- Direct discharge to a surface water sewer
- Controlled discharge into the combined sewerage network ~ this option is a last resort when all other options have been discounted.

Development on Greenfield sites shall not discharge surface water into the public combined sewerage network and shall not increase the rate of run-off into the public surface water network ~ this statement does not replace the priority options for surface water management above.

On previously developed land, a reduction of at least 30% will be sought, rising to a minimum of 50% in critical drainage areas ~ this statement does not replace the priority options for surface water management above

Any discharge to the public sewerage system must be via approved SuDS and will require an approved discharge rate.

The following link shows examples of SuDS solutions; case studies; presentations; policy and regulatory documents relevant to the delivery of sustainable drainage etc.

<http://www.susdrain.org/>

The case studies section highlights numerous examples of how problematic ground conditions; topography issues can be overcome [i.e. Olympic Park, East London].

A discharge to groundwater or watercourse may require the consent of the Environment Agency.

Green Infrastructure

You should seek opportunities to use developer financial and/or resource contributions to meet common objectives.

Use green and open spaces, sports and recreation facilities to address surfacewater and climate change issues.

Building green infrastructure assets such as ponds, swales and wetlands will not only meet your Green Space needs but also your local existing and/or future surface water/ climate change issues.

Artificial pitches; cycle paths; play areas multi use games areas and skate parks can be used to local underground civil engineering SuDS solutions.

SuDS solutions that incorporate irrigation systems will help support and maintain your allotments, parks and garden areas.

You should identify opportunities for the installation retro fitting SuDS.

Climate change adaptation

Climate change is a major consideration on the future available capacity of sewerage and water supply infrastructure networks; treatment works and watercourses.

Planners and Developers should consider that the impacts of climate change on future development, existing infrastructures, and the environment.

Developments should be designed to reduce the impacts of climatic change on the development itself, the existing infrastructure and the environment; with consideration for hotter, drier summers, greater flood risk and more severe weather events.

To reduce the impacts of climate change on the existing infrastructure you should seek a significant reduction in the discharge from developments.

Urban creep has a significant impact on capacity; the paving over of gardens contributes to flood risk and should therefore be discouraged.

Development adjacent to infrastructure assets

The future expansion of infrastructure assets to meet the needs of future development and changes in legalisation could create a potential conflict with development plans; therefore developments adjacent to our assets should be discouraged by you

Water and sewerage companies have a legal right of access to their assets; this can be for their operational and/or maintenance therefore we will not permit the building over and/or near its infrastructure assets.

To protect sensitive developments [ie residential uses] the Environmental Health Authority should be consulted if any future development is to be located adjacent to wastewater infrastructure assets. In most cases, the distance of 400 metres from the wastewater treatment facilities is used as a guide, but this can differ due to local topography, climatic conditions, size and nature of the wastewater infrastructure asset and development in question.

You must ensure we are kept informed of any waste management related development and/or planning application within 500m of a Large Diameter Trunk Main [LDTM]. Prior consent will be required from us before granting approval. It is also essential that this information is included in future planning policy

We would seek your future support in the planning processes to protect/secure land for infrastructure use.

Infill land

You should be aware that, on occasion, gaps are left between properties; this is due to the presence of underground utility assets. We will not allow the building over or near to these assets and development will not be acceptable in these locations.

Greenfield Development

Generally Greenfield sites have limited or no supporting water supply and/or sewerage infrastructure assets; they may be adjacent to existing infrastructure assets that are located on the fringe/limits of the existing water supply and/or sewerage infrastructure networks which are of a small diameter and have limited capacity to support additional capacity.

Providing supporting infrastructure to Greenfield development sites could result in the need to upsize the existing assets to support the additional capacity needs; therefore this may result in a need for a co-ordinated approach to phased development in line with any supporting infrastructure works.

Carbon impact

You should consider the total carbon impact of future developments; not only the footprint of the development but also the carbon impact for additional infrastructure assets; their associated treatment processes and their future maintenance and operation requirements. To meet future reduction targets you should consider the wider carbon impact when determining the location of future developments.

eLANDORassociates
Town Planning Consultancy Services
PO Box 1983
Liverpool
L69 3FZ

9 July 2013

Lynn Evans

by post and e mail:

Dear Ms Evans,

Devonshire Park Neighbourhood Plan 2013 -2028: Public Consultation

We refer to the above Neighbourhood Plan published for consultation in June this year with a request for comment and representations to be received by 26 July 2013.

We submit representation to the Devonshire Park Neighbourhood Plan (DPNP) on behalf of Peter who is the owner of a large vacant property, 17-21 Rocky Bank Road, Birkenhead, CH42 7LB.

We submit the following objections:

1. The National Planning Policy Framework (NPPF) identifies in paragraph 184 that: "*Neighbourhood Plans must be in general conformity with the strategic policies of the Local Plan ... Neighbourhood Plans should reflect these policies and neighbourhoods should plan positively to support them*".
2. The DPNP claims to be in general conformity with the strategic policies of the "emerging Core Strategy Local Plan Local but makes no reference to those policies or as to how it so complies. We refer in this context to Strategic Objective 2: Housing Regeneration; Strategic Objective 7: Sustainable Development; Policy CS1: Presumption in favour of Sustainable Development; Policy CS2: Broad Spatial Strategy; Policy CS6: Priorities for Suburban Birkenhead; Policy CS18:Housing Requirement; Policy CS18 Housing Requirement: Policy CS19 Housing Implementation; Policy CS21 Criteria for New Housing Development CS22: Affordable Housing.
3. The DPNP has been published in advance of the Public Examination of the Core Strategy and Local Plan and before it has been assessed or tested at Public Examination. In the setting of the advice of NPPF that neighbourhood plans **must** be in general conformity with the strategic policies of the Local Plan, evidence suggests neighbourhood plans that precede the adoption of a local plan/core strategy are likely to fail. As the DPNP makes no reference the emerging Core Strategy policies, we take the view that the Neighbourhood Plan should be withdrawn rather than waste public money on a Referendum and Examination.
4. There is a lack and total absence of any clear audit trail demonstrating how decisions and policies for development in the area have been reached. For example, there is no reference to consultee responses such as English Heritage, which suggested a totally different approach to securing high quality design rather than a "blanket embargo" on some forms of development.
5. The policies now proposed for Examination are different to those which appeared in the pilot plan but no justification for change is offered. This underlines the point regarding the lack of a robust and coherent audit trail.

6. The evidence base of the DPNP is suspect with regard to data on house types and household composition as it includes composition ONS 2011 data for the Wirral and estimated figures for the neighbourhood area, which pre-dates the 2011 census.
7. There is pre-occupation with household composition and what constitutes a "family". There are frequent references to "family housing" and "family balance" which are not defined. This is used to justify and determine policy outcomes. It would be a concern if this approach was applied elsewhere in communities with a richer more diverse cultural and ethnic background.
8. Apartments are classified as Class C3 (Town & Country Planning (Use Classes) Order 1987 and subsequent amendments). Devonshire Park Policy 2 refers to flats and HMOs as a single category which they are not. HMOs are either are classified as Class C4 (3-6 persons) or Sui Generis (7 or more persons). This legal distinction is not considered. The policy approach is unsound and could result in distorted outcomes as change of use from Class C3 to C4 is permitted development.
9. Devonshire Park Policy 2 as worded is incomprehensible and incapable of application.

We would wish to be notified when the DPNP is submitted and re-advertised by the Wirral Council and provided with details of the proposed referendum and Public Examination dates as soon as these are known.

We would respectfully request that the above response is fully taken into consideration.

With regards

Yours sincerely

Edward Landor MRTPI
EDWARD LANDOR ASSOCIATES