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# Core Strategy for Wirral - Report of Consultation on Spatial Options

## 1 Background to the Consultation

**1.1** This report sets out the background to the consultation undertaken by the Council on the Spatial Options for a Core Strategy Development Plan Document for Wirral, as required under Regulation 25 of the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended).

**1.2** The results of the consultation have now been used to inform the preparation of a Preferred Options Report for the Core Strategy.

**1.3** This section sets out the details of the consultation process that was followed. Later sections set out the responses that were received and how the Council has responded to them in the Preferred Options Report.

**1.4** The Core Strategy Development Plan Document is intended to set out the long-term vision, objectives and spatial strategy for the Borough, for a period of up to fifteen years. The Core Strategy Development Plan Document will replace the majority of the strategic policies set out in the Unitary Development Plan for Wirral, adopted in February 2000. It will be used to guide decisions on individual planning applications and will set the overall framework for the site-specific proposals to be included in a future land allocations Development Plan Documents.

**1.5** The timetable for the preparation of the Core Strategy Development Plan Document is set out in the Local Development Scheme for Wirral. A copy of the latest Local Development Scheme and a summary of progress can be viewed on the Council's website<sup>(1)</sup>.

### The Consultation Process

**1.6** Consultation on the Spatial Options began on 11 January 2010 and ended on 5 March 2010. Consultation took place on the following documents:

- Core Strategy Spatial Options Report (January 2010)
- Spatial Options Interim Sustainability Appraisal (January 2010)
- Spatial Options Initial Equality Impact Statement (January 2010)
- Habitats Regulations Assessment - Interim Screening Assessment (November 2009)

**1.7** The consultation documents were accompanied by three reports of previous consultation:

- Initial Report of Consultation (July 2006)
- Second Report of Initial Consultation (February 2009)
- Report of Consultation on Issues Vision and Objectives (January 2010)

1 <http://www.wirral.gov.uk/my-services/environment-and-planning/planning/local-development-framework>

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**1.8** Comments were invited on any part of these documents. The Spatial Options Report also invited comments on twenty-two Consultation Questions designed to focus attention on specific areas of the document.

**1.9** Notification letters inviting comments on the consultation documents with a paper questionnaire and a summary "taster" booklet were sent to 569 contacts registered on the Council's Local Development Framework Consultation Database, with free copies of the consultation documents offered on request. A list of the people and organisations contacted is provided in Section 10 of this report.

**1.10** Printed copies of the consultation documents, a questionnaire and a "taster" booklet were sent to local Members of Parliament, to elected Councillors and to 49 specific consultation bodies. A list of the bodies included is provided in Section 11 of this report.

**1.11** Printed copies of the consultation documents were also placed on deposit for public inspection at the public counter of the Technical Services Department in Birkenhead, at all 24 public libraries across the Borough and at six One Stop Shops<sup>(2)</sup> during normal opening hours.

**1.12** Public notices were published for two consecutive weeks in the Wirral Globe and Wirral News on 13 and 20 January 2010. Press articles were also published in both newspapers on 13 January 2010.

**1.13** Electronic and downloadable versions of the documents were also made available, free of charge, through the Council's Local Development Framework Limehouse Software on-line consultation website<sup>(3)</sup>. A news item was placed on the Council website throughout the duration of the consultation period from 12 January 2010 and links to the documents were also placed on the Council's Local Development Framework and Planning Applications (Development Management) website home pages.

**1.14** Electronic notifications, with an electronic copy of the notification letter, a consultation questionnaire and a "taster" booklet with a link to the Council's on-line consultation website were also sent to previous respondents registered on the Local Development Framework Contacts Database who had provided e-mail addresses; to members of the Council's eleven Area Forums; to the members of the Local Strategic Partnership Assembly and Executive Board; to the members of the Wirral Investment Network; and to the Directors of each of the Council's Departments.

**1.15** A Public Open Day was held between 10.00am and 8.00pm at Wallasey Town Hall on Friday 22 January 2010. Invitations to the Open Day were included in all the notification letters, e-mail notifications, press notices and press articles. 125 people signed the attendance register for the Open Day, although others who did not sign

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2 at Conway Building, Birkenhead; Bromborough; Hoylake; Dominic House, Liscard; New Brighton; and Upton

3 <http://wirral-consult.limehouse.co.uk/portal>

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in were also in attendance. A short presentation introducing the Spatial Options was repeated every hour throughout the Day. Printed copies of the consultation documents were available free of charge; copies of evidence base documents were available for inspection and by order free of charge on CD; and planning officers were available throughout the day to answer questions and provide additional information. Comments could also be registered on comments sheets provided for the purpose.

**1.16** The consultation documents were also presented to the Wirral Investment Board on 15 January 2010 and to a meeting of the Older People's Parliament on 5 March 2010, with a question and answer session.

**1.17** The consultation drew 1,027 individual comments from 108 respondents. A list of respondents is provided in Section 12 of this report. 52 respondents replied by e-mail; 43 on-line; 12 by letter and one by fax. 32 of the respondents were local residents; 24 were local amenity societies; 24 were development interests such as landowners, developers and/or their agents; 22 were public bodies or associated agencies; 4 were utility or infrastructure providers; and 2 were national societies. An additional 24 comments were submitted in person at the Open Day<sup>(4)</sup>.

**1.18** None of the comments were directed towards the Initial Equality Impact Statement. Three comments were directed towards the Interim Sustainability Appraisal<sup>(5)</sup> and three towards the Habitat Regulations Screening Assessment.

**1.19** The Local Development Framework Annual Monitoring Report for December 2009 was also made available for consultation alongside the Spatial Options Report. Four comments were submitted through the Council's on-line consultation website by one respondent concerned about the re-use of long term empty homes; retaining "characterful" older buildings; payment systems for public transport; and the control of dog dirt along West Kirby promenade.

**1.20** All the comments received on the Spatial Options Report are set out in the tables below.

For further information please contact: Wirral Council, Strategic Development, Town Hall, Brighton Street, Wallasey, Wirral CH44 8ED - Telephone 0151 691 8206 - Fax 0151 691 8188 - Email [pamconway@wirral.gov.uk](mailto:pamconway@wirral.gov.uk)

4 comments submitted at the Open Day are marked by the prefix "OD" in the following Analysis of Responses Received

5 these comments are now also addressed within the revised Sustainability Appraisal Report prepared to accompany the Preferred Options Report

## 2 Analysis of the Responses Received

**2.1** The following sections summarise the comments received under each of the main sections of the Spatial Options Report and set out a summary of the Council's response:

### Introduction

**2.2** Comments on the Introduction to the Spatial Options Report were mainly directed towards:

- the amount, format and complexity of the information presented
- problems with the consultation process
- the sustainability appraisal and habitat regulations assessment
- the timescale for the Core Strategy

### General Comments

**2.3** The following general comments were submitted:

ID	Summary of Responses Received
102	The Spatial Options Report is huge, comprehensive but turgid and a deterrent to reading. It will be interesting to see how many tax-payers make comment. Even more interesting if the Council take note.
141	It is a pity that the Spatial Options Report is so long and difficult to read. Summaries for each Spatial Option for each Settlement Area with detailed notes attached would have helped. Uniform numbering of sections and paragraphs is preferred. It is unfortunate that there are two versions in PDF and on-line as each must be read to prove agreement.
228	The Spatial Options Report is very long and complex, running to well over a thousand pages with the various ancillary reports and consultation documents. It has taken over three days just to read through and respond to the Spatial Options Report. Appreciate that the Core Strategy is complex; that presentations have been held at the Town Hall; adverts have placed in the press; and relevant documents have been available at Libraries and One Stop Shops but the volume and complexity of the documents will limit the number of responses from individual residents, to an appallingly small percentage out of a population of approx 310,000. Vested interests such as developers and campaigning societies will respond but will only give a 'slanted' view which will not reflect the overall views and wishes of the majority of individual residents. This will not be the first time that Council (and PCT) consultations will have met with a poor response from residents. It would be wrong if the views of the vested interests were to overly influence policy; especially the views of developers who have only one goal. Few developers have any real concern for the people or environment in which

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	<p>they carry out their work. It is obvious from initial consultation that ordinary, individual residents are very sceptical about the aims of the Council and developers and are extremely concerned to ensure the protection of what little is left of the green environment and heritage of Wirral. Do not know how to get more individuals to readily respond but such a complex and time consuming document is not the way forward. Can the response figures be published in the local press once they have been collated (i.e. by individual, business, representative society etc)?</p>
260	<p>There has not been sufficient time to examine the evidence that the Council has relied upon in preparing the Spatial Options Report. A considerable number of other documents are unavailable at this stage. The Report makes several references to a forthcoming Integrated Regeneration Study which will feed into the emerging Core Strategy at a later date. The future influence of this study is a concern. Copies of the Integrated Regeneration Study should be provided at the earliest opportunity.</p>
268	<p>Some of our comments do not fit easily within the structure of the consultation questions.</p>
272	<p>The Spatial Options Report appeared daunting at first but with peace and quiet took just 1 hour and 40 minutes to read. It was very well put together with a logical and easy to understand format. The consultation questions at the end of each key point were easy to respond to.</p>
398	<p>Very unhappy about decision in the Green Belt at The Warrens, Thingwall. Disillusioned with consultation. Thinks residents are treated with disregard.</p>
762	<p>The Council's preferred method of consultation is online. The introductory web page states that the Council will be publishing the names and details of respondents and the groups they are representing, which could be a deterrent to participating. The hard copies of the consultation document and its covering letter contain no mention of name and personal details being required.</p>
764	<p>The little green "taster" booklet was no help at all. The maps were too small and the first one showing Settlement Areas needed an area specific key so that later maps could be related back to where people live. People do not have a good enough knowledge of the geographical layout of the Borough without at least ward or main town names indicated. The questionnaire reads like a high level examination paper beyond modern A Level and is more than enough to stop people in their tracks and lose the will to live. Anyone without access to a computer will have to queue at the library to cross reference the questions to the main document before they can make a considered response. How many will even bother once they see the number of pages they will have to trawl through. The keys on most of the maps in the Spatial Options Report are indecipherable and the maps are too small to understand. The document is not in a format, size or language that would</p>

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	be readily understood by Wirral residents who might wish to participate. It is only relevant to planners and lawyers. How can politically and community aware people comment on something that is so important, with such far reaching consequences for the Borough, when they cannot understand the technical and legal jargon involved, not to mention the very short time available to read, digest and sensibly respond?
877	Area Forums should be given the opportunity to study the representations coming from or relating to their communities, to let them feed in further comments.
987	A high quality report that is very clearly presented, despite its complex contents.
1059	The Spatial Options Report is too long and convoluted in arrangement. While it has a better focus on the spatial planning of Wirral as a whole, it is not easy for local people to understand what it might mean in their local communities. Limehouse software offers more benefit to the Council than to local people, favouring only those who can use it and are happy with a fairly complex electronic interface. Deficiencies in the reach of the consultation will need to be rectified, especially among communities that suffer exclusions in other areas of personal, community and civic life. The software also forces users to accept the basic organisation and premises of the options proposed. A response that does not fit the structure, as presented, is further disadvantaged by the need to respond to twenty-two inappropriately leading questions, which also reflect the document's structure, such as Question 3 which asks - "Do you agree that these are the most appropriate Spatial Objectives for the Core Strategy to pursue?"
1105	The Core Strategy process makes the old UDP process seem streamlined and minimalist. It seems designed to waste time, create jobs, generate paper and is an unnecessary drain on taxpayers' resources. There has been no option but to download multi-part documents as a whole. The Biodiversity Audit used 12Mb maps meaning huge files to copy, store and open. The format of documents made them difficult to read and navigate. Chapter names should be provided in the page header or footer. A "1 page map" of documents and processes is needed so the reader can easily understand the purpose of the document being read and where it fits in the process. Will we be told the final cost of this process and how it can be compared to the UDP? Have the basic issues facing Wirral really changed in the last 20 years?
OD16	The Open Day presentation should have been given to each area of Wirral, for their area interests.

**2.4** The Council has responded to these comments by making improvements in the consultation arrangements for the Preferred Options Report and by publishing an analysis of the type of respondent in paragraph 1.17 of this report.

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## Appraisals and Assessments

**2.5** The following comments were submitted on the Interim Sustainability Appraisal Report (SA) and the Habitats Regulations Screening Report (HRA):

ID	Summary of Responses Received
625	The HRA shows that further issues need to be looked into. The Appropriate Assessment should be developed early to ensure that Natural England will not raise major concerns at publication stage. Any emerging key issues should be resolved before the Core Strategy is published.
792	The Interim SA is comprehensive and combines an SA Scoping Report with the Sustainability Commentary. Supporting evidence is available with the evaluation but has created a hefty document. The scoring tables should combine symbols and colour codes to make it easier to compare the scores. A summary table at the end of each set of options should highlight the main differences in performance. Without this the reader must accept the summary interpretations given in the boxes in the main Spatial Options Report or must review the considerable detail in each option appraisal in full. It is preferable to commission an independent SA rather than to do it in-house. We understand that the SA Panel has been involved but it would be more transparent to clearly state that the SA has been done by the Council, not by consultants; the organisations which make up the Panel; and that the Panel endorses the results. The level of involvement of the Panel during the detailed options assessment or whether it was only belatedly given an opportunity to review and sign off the recommendations is not clear.
902	Welcome the references to SA and HRA prepared alongside the production of the Core Strategy. More detail should be provided about these processes and how they have contributed to the production of the Core Strategy, for example, by making reference to the very useful SA summary boxes in Sections 4, 5 and 6.
926	The SA Report is presented clearly and concisely. The background information in SA Sections 2 and 3 helps to set the context and usefully highlights how the SA process feeds into the production of the Core Strategy. Some of the information in the main body of the report could be more suitably presented as an appendix, such as the table setting out links to other plans, policies and programmes which currently constitutes SA Section 7. The non-technical summary only introduces the document and outlines its structure but should summarise the complete SA report including the methodology used and the key findings which should be addressed at the next stage. Following on from the SA Scoping Report (July 2007) and the Interim SA Report published alongside the earlier Issues, Vision and Objectives (February 2009), the Interim SA Report is limited in scope, in terms of taking account of the need to prepare an 'environmental report' to meet SEA Directive requirements. The SA Report to be published alongside



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	<p>the Preferred Options should include the environmental baseline. More reference to baseline information should be included within the appraisal tables, to justify the judgements about the potential effects on SA objectives. Reference could be made to specific sensitive receptors that may be affected, such as designated sites, BAP habitats, particular landscape character areas etc., in the assessment under the environmental objectives. The range of indicators set out in SA Section 8 is supported. Pleased to see the inclusion of BAP habitats and species. Hope to see inclusion of monitoring proposals in the SA Report at the next stage, explaining how these indicators will be used to monitor the effects of the Core Strategy. The findings of the SA are supported but the key findings should be summarised at the end of the report in a concise conclusion, setting out recommendations for how to mitigate any significant adverse effects identified and enhance any significant positive effects. These key findings should also be summarised within the non-technical summary.</p>
927	<p>Support the approach taken towards the HRA and presenting the findings. A map should be included to illustrate the location of European Sites to make it easier to interpret the information given about the likely effects of the Core Strategy. Agree that significant negative effects on European Sites cannot yet be ruled out, as a result of the proximity of coastal designated sites and the potential impacts of water abstraction and recreation on the Dee Estuary/Bala Lake SAC. Note the consideration of potential plans and projects which may act in combination with the strategy in HRA paragraph 5.7. Wirral Waters as a whole and not just its individual elements should be included in HRA Table 2 due to potential impacts on the Mersey Narrows and North Wirral Foreshore pSPA/ Ramsar site. HRA paragraph 5.8 correctly recognises the importance of 'off-site' roosting areas, in areas where qualifying bird species roost outside the designated site boundaries. The potential for impacts on qualifying bird species from proposals on or near off-site roosting (or feeding and breeding) areas should be considered within the HRA, as disturbance or habitat loss outside the designated site boundary could also have an adverse effect on the integrity of the designated site. All known off-site roosting (or feeding and breeding) areas should be included in the assessment for likely significant effects on the relevant SPA(s) in the next stage of the Core Strategy. The assessment of Broad Spatial Option 1 shows a significant effect on all the European Sites. A conclusion of "a potential significant effect on all the European Sites within the Plan area as a result of recreational pressure is therefore considered likely and will require suitable mitigation" would be more appropriate. HRA Paragraph 6.2 and the screening matrix in HRA Appendix 1 requests confirmation that it is appropriate to "screen out" the West Midland Mosses and Oak Mere from further consideration. The screening out of these sites is supported.</p>

**2.6** The Council has responded to these comments by making amendments to the next stages of the Sustainability Appraisal and the Habitats Regulations Assessment.

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## Timescales

**2.7** The following comments were submitted on the timescales for the Core Strategy:

ID	Summary of Responses Received
627	The end date of 2031 meets PPS12 guidance by looking at a minimum of 15 years but could be slightly shorter, if a land supply could not be identified for the whole of the period to 2031.
1136	The plan period is to 2031 but different time periods are also referred to, with employment land to 2030 (page 150) and retail floorspace to 2026. These time periods should be aligned, to ease the process of understanding the document. PPS12 states that Core Strategies should cover a period of 15 years from adoption.

**2.8** The Council has responded to these comments by revising the plan period to end in 2027 in the Preferred Options Report<sup>(6)</sup>.

## 3 Spatial Portrait

**3.1** The following sections set out the comments received on the emerging Spatial Portrait for the Borough and the responses to Consultation Question 1 - *Do you agree with the spatial portraits set out above? Is there anything else that you think should be included? Please refer to the Settlement Area to which you are referring in your response.*

### Borough Profile

**3.2** The following comments were directed towards the details contained within the Borough-wide profile and the main issues that may need to be addressed by the Core Strategy:

### General Comments

**3.3** The only general comment related to the need for clearer mapping so that key features were easier to identify:

ID	Summary of Responses Received
1124	The maps are useful but are not clear enough. Some of the pictures show railway lines but not the M53 Motorway, which is surprising when it is later used to divide the Borough into "west of the M53" and "east of the M53".

**3.4** The Council has responded to this comment by improving the scale of the mapping in the documents related to the Preferred Options Report.

6 Preferred Option 1 - Plan Period refers

## Borough Context

**3.5** Comments on the details contained within the Borough Context were mainly directed towards the need for a stronger sub-regional focus, to recognise the limits of the peninsula and to respond to the national downturn:

ID	Summary of Responses Received
223	The "contexts" are too restricted to the geographical boundaries of the Borough. A statement is needed on how the Council sees the Borough within the sub-region. This would highlight the distinctiveness of the Borough; give a greater focus to development needs, by providing a more realistic assessment of what is possible, for example, given the existence of Liverpool One and the Trafford Centre; and highlight assets which will become increasingly important such as the need for a resurgence in the local and national production of food.
796	Generally agree with the overall summary. The key factors include: a large rural area; a declining, ageing population; declining industry; areas of high unemployment /deprivation; the dormitory role within the wider region, specifically Liverpool; a peninsular with a long coastline but a reduced catchment area. The last two factors do not appear to be considered under any of the Spatial Options. The advantages of a strong Green Belt, keeping the distinctiveness of the rural areas and helping to focus development into the existing urban areas, are not given prominence.
986	The report does not give any sense of the engagement with neighbouring authorities over increasingly difficult investment conditions, limited public sector resources and lack of credit availability. The Core Strategy needs to take more account of what will attract investment in these difficult circumstances.
OD10	Job opportunities, transport facilities and affordable housing options should be considered as a whole, together with targeted provision for increasing the skills of the existing population.

**3.6** The Council has responded to these comments by amending the Spatial Portrait, providing additional detail within Preferred Options 3 and 4 and by increasing the focus on delivery within the Core Strategy.

## Historic Context

**3.7** Comments on the details contained within the Historic Context were mainly directed towards the accuracy of some of the historical details:

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ID	Summary of Responses Received
317	Paragraph 2.8 - "The establishment of John Laird's boiler, ironworks and shipyard at Tranmere..." should be changed to read "The establishment of William Laird's boiler works and shipyard on Wallasey Pool and their transfer to the Mersey waterfront...". The boiler works and shipyard were established on Wallasey Pool by William Laird in the 1820s and it was his son, John Laird, who transferred the undertaking to the Mersey waterfront in the mid 1850s, in response to the work being done on the docks.
655	Paragraph 2.8 - Price's Candle Works was established at Bromborough in 1852. Levers was first established in Bebington in 1888 and later named Port Sunlight. Levers first bought some land in Bromborough in 1905.

**3.8** The Council has responded to these comments by amending the Spatial Portrait.

## Economic Context

**3.9** The only comments on the Economic Context of the emerging Spatial Portrait relate to the role and impact of retailing on prospects for economic development and the need to protect the Borough's assets:

ID	Summary of Responses Received
111	Fails to mention that the over-development of the retail sector has taken place on sites that could have been suitable for productive industries and businesses. It is doubtful that the low level of productive output can be reversed in Wirral and the peninsula should focus on its role as a dormitory area. The drive to create productive output through major development projects should not be at the expense of valued aspects such as the coastline, Green Belt, far-reaching views, nature, residential areas, heritage, recreation, community and access to Liverpool.
112	Fails to record the decline in the viability of the traditional town centres following the rapid expansion of supermarket retailing.

**3.10** The Council has responded to these comments by making clear and separate provision for town centre and employment uses under Preferred Options 11, 12 and 13.

## Social Context

**3.11** Comments on the details contained within the Social Context were mainly directed towards anti-social behaviour, the lack of university provision and the need for skills to support urban regeneration:

ID	Summary of Responses Received
112	There is no reference to disturbance from anti-social behaviour, especially from the over-provision of wine bars and restaurants.
336	The lack of a university is major cause of young people leaving Wirral and many young people don't come back.
OD11	The regeneration of people with trades, employment, innovative skills and young people and older people working together, is important.

**3.12** The Council has responded to these comments by including relevant information within the Spatial Portrait and by including a reference to training opportunities in Preferred Options 11 and 17.

### Housing Context

**3.13** The only comment on the Housing Context for the emerging Spatial Portrait was:

ID	Summary of Responses Received
651	More information should be provided on the implications of the Growth Point, in terms of how it will address the Borough's strategic priorities and how it is going to be delivered.

**3.14** The Council has responded to this comment by providing additional information related to Preferred Spatial Objective 7 and Preferred Options 5 and 21.

### Transport Context

**3.15** Comments on the Transport Context were mainly directed towards the importance of the M53 motorway and its relationship with Ellesmere Port, the need for further transport studies, and the need to acknowledge rail services to Ellesmere Port:

ID	Summary of Responses Received
104	The document list does not include any transport studies. What baseline transport information has the Core Strategy been based on? What further work is proposed? Paragraph 2.34 briefly mentions the M53 but does not provide any information about capacity raised in the Cheshire West and Chester Integrated Transport Strategy and by the Highways Agency. The M53 was originally built through Ellesmere Port as an all-purpose 2-lane trunk road which was later re-classified as a motorway. This section is already close to capacity at peak times. It is essential that the cumulative impact of new developments on the M53 corridor and local rail network are fully understood, so that proposals in Ellesmere Port and in Wirral do not constrain

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	each other. Further work is required to assess transport impacts and develop potential solutions. The emerging Atlantic Gateway Framework provides an opportunity for local and regional partners, the Highways Agency and Network Rail, to work together to co-ordinate strategic proposals and consider cross-boundary transport issues. Draft RS2010 states that the strategy for the Atlantic Gateway should drive complementary growth across the region, rather than pursuing growth in one part of the region at the expense of another.
112	Fails to state that rail services also run to Ellesmere Port - a major area of employment as well as Liverpool, Chester, New Brighton and West Kirby. The over-use of the car is not mentioned.
319	Paragraph 2.38 - Ellesmere Port & Neston and Chester are now part of Cheshire West and Chester.

**3.16** The Council has responded to these comments by amending the Spatial Portrait and by using the Preferred Options Report as the basis for further modelling work.

## Environmental Context

**3.17** Comments on the details contained within the Environmental Context were mainly directed towards flood risk and River Basin Management Plans and the approach to biodiversity, geodiversity and climate change:

ID	Summary of Responses Received
111	Previous strategies and proposals have failed to maximise valued assets such as the coastline, Green Belt, far-reaching views, nature, residential areas, heritage, recreation, community and access to Liverpool. Recognition of the threats to the distinctiveness of townscapes and villages by uncontrolled and inappropriate development is welcomed. The treatment of issues related to climate change and sustainability is, however, disappointing and insufficient. The Transition Town movements are ignored. The document appears to pay lip service rather than make a serious contribution.
112	Agree that not all aspects of Wirral's biodiversity is captured by site designations. Action to assess and prepare inventories and records has been poor. Biodiversity work on the Golf Resort is not referred to. Recognition of the threat to traditional housing areas from inappropriate development of flats and out of character buildings is welcome. There is no reference to agriculture and local production or to the findings of the Merseyside Rural Study.
157	Tidal surges are expected on top of sea-level rise. This is a great threat to all low-lying parts of the Borough, which is not faced up to in the Spatial Options Report.

319	Paragraph 2.47 - statutory River Basin Management Plans have now been produced. Paragraph 2.48 - assumes that the reference to areas potentially liable to flooding relates to fluvial and tidal outlines only. The Wirral Strategic Flood Risk Assessment (SFRA) should be used to inform the Core Strategy. Surface Water Management Plans will provide additional information. Assume that the Key Statistic of 1,686 hectares potentially liable to flooding has been calculated from the Wirral SFRA and includes areas behind flood defences, which are still at risk.
589	Paragraph 2.43 - the reference to international importance for nature conservation should include reference to the SAC/SPA designation.
657	Paragraph 2.46 - The key conclusions from the Strategic Flood Risk Assessment should be brought out, to confirm it has been taken into account when developing the spatial strategy and if EA have any concerns. The levels of risk should be shown on Picture 2.6.
821	Biodiversity is very important in Wirral but has been overlooked in much of this document. Very few local authorities have both the amount and variety of biodiversity present in Wirral and have to juggle that alongside 300,000 people within 60 square miles. It is essential that the protection of biodiversity gets explicit mention wherever appropriate. The Habitats Regulations Assessment shows that the Core Strategy has to take account of internationally and nationally protected sites and the legal duty to keep them in good condition.
905	Welcome reference to SSSI designations and sites of international, national and local importance. If biodiversity resources are not currently captured by site designations a policy is needed to conserve, protect and enhance. Additional emphasis should be placed on the value and importance of the landscape, referring to the Landscape Character Assessment and summarising the landscape character types within the Portrait. A more detailed description of the Borough's geodiversity and mineral assets should be provided in the Borough Profile in addition to the reference at paragraph 2.276. Further detail on the nature and location of geological sites could be provided at paragraph 2.43.

**3.18** The Council has responded to these comments by amending the Spatial Portrait, including Preferred Spatial Objective 6 and by including relevant references to climate change and biodiversity throughout the Preferred Options Report.

## Community Facilities

**3.19** Comments on the details contained within the Community Facilities context were mainly directed towards factual details and the need for places of worship:

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ID	Summary of Responses Received
111	There is no mention that the role of supermarkets has become dominant in Wirral and has severely damaged traditional town centres and community, walking-based shopping. The reference to "where there is specific local shortfall" suggests that the further expansion of the supermarket sector will be allowed to continue whatever the price in local shops and communities.
112	The rejection of the Council's assessment of libraries by the Government commissioned inquiry should be referred to. Recognition of the poor standard of parks and open spaces is welcomed.
311	Agree that the network of community facilities could be described as extensive but the need is not to close or rationalise but to improve the facilities to cater more effectually for religious/charitable work. Places of worship are essential to Wirral. A commitment to make provision for places of worship to be improved or relocated in the future should be explicitly stated.
1106	The National Grid 4ZL line/ 275kV route from Capenhurst substation to Birkenhead substation, which continues as a 275kV cable to Lister Drive substation in Liverpool, forms an essential part of the electricity transmission network in England and Wales. National Grid has no gas transmission assets located within Wirral but National Grid Gas Distribution owns and operates the local gas distribution network in the area.
OD13	Public transport needs to be improved to Arrowe Park Hospital. Car parking is difficult and it is difficult to access the hospital by road from Bebington, Bromborough and Eastham.

**3.20** The Council has responded to these comments by amending the Spatial Portrait.

## Waste Management

**3.21** The only comment received in relation to the Waste Management context of the emerging Spatial Portrait was:

ID	Summary of Responses Received
268	While factually correct, this section fails to acknowledge that waste management facilities are part of the District's critical infrastructure and that it is obliged to cooperate with the other Merseyside Districts to deliver new capacity to meet the evolving need. The link to Waste DPD could be strengthened by making more reference to the requirements for new waste management facilities. Mention should be made of strategic waste management facilities, such as the site at Bidston. The consent at Eastham is not referred to until the section on options for renewable energy.



**3.22** The Council has responded to this comment by amending the Spatial Portrait and including Preferred Option 20.

## Key Issues

**3.23** Comments on the list of Borough-wide Key Issues included:

ID	Summary of Responses Received
821	Bullet point 10 should also include areas of national and local importance for nature conservation. Bullet point 13 - linkages and corridors need particular consideration as biodiversity has to move to adapt to climate change (bullet point 17).
905	References to climate change, renewable energy, green infrastructure and biodiversity are welcome in the list of Key Issues. Also welcome recognition of the need to protect locally distinctive assets including the landscape and all areas of importance for nature conservation but the wording should be amended to read "protect and enhance" (bullet point 10).
1101	Bullet point 17 on 'climate change' should be placed higher up the list to avoid the impression that it is considered to be of minor importance.

**3.24** The Council has responded to these comments by amending the Spatial Portrait.

## Settlement Area Profiles

**3.25** The following general comments were submitted in relation the Settlement Area Profiles:

ID	Summary of Responses Received
186	Care needs to be taken not to consider Settlement Areas in isolation. For example, green areas in one Settlement Area may provide a valuable resource for a neighbouring community. Some of the wording seems to overlook this.
231	The spatial portraits for each Settlement Area are helpful and effective in defining the distinctive parts of the Borough and assessing the key issues for each area.
409	Welcome the detail of the Settlement Area reports and their objectivity and honesty, which should provide a sound basis if they can be turned into meaningful and understandable planning rules to allow discrete development and a balanced society/community for all ages and interests. Some jargon remains and should be removed or explained where possible.

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564	The relationship between the Settlement Areas and the Inner, Outer and Rural areas used in the Regional Spatial Strategy should be clarified.
567	The Spatial Portraits provide a fairly accurate overview of the current issues and dynamics, including strengths, weaknesses, opportunities and threats.
628	The Spatial Portrait provides a good analysis but as the document develops you may wish to cut down on some of the more detailed text to concentrate on some of the key issues mentioned. The final Core Strategy should be between 50-100 pages long.
650	It would be easier if the Settlement Areas were referred to by a name rather than by a number.
652	Picture 2.7 should be re-labelled to confirm that Hoylake and Meols forms part of Settlement Area 6.
821	The Profiles should all have a heading included, such as Biodiversity and Green Space, to ensure that biodiversity is consistently recognised and considered.
857	There should be a clearer way of reminding readers which parts of the Borough are included within each Settlement Area.
906	We would like to see a specific section within each Spatial Portrait entitled 'natural environment' to address issues such as landscape, biodiversity, green space and designated areas and species.
1033	The definition of separate Settlement Areas means that some cross-area issues are lost. This is especially true of climate change, where it is unclear what the picture for Wirral is in terms of overall emissions and carbon footprint. This needs to be addressed within all the defined Settlement Areas.
1064	Agree with the eight Settlement Areas described, which work best where they are clearly discrete areas. Where Settlement Areas physically adjoin it is more likely that some self-identifying communities will straddle the boundaries shown on the maps. Care should be taken to refine these boundaries to ensure that subsequent initiatives and investments do not split communities. This applies to both urban and rural communities.
1125	Support the inclusion of these detailed descriptions of the different areas of the Borough, as these give an excellent summary of the local issues. However, these could be scaled back at the next stage to focus on key issues or be removed to a supporting document. The use of numbers rather than names can create problems with cross-referencing. Can the Settlement Areas be named to make the document easier to use?

**3.26** The Council has responded to these comment by amending the Spatial Portrait, by naming the Settlement Areas throughout the Preferred Options Report and by presenting the revised Spatial Portrait as a separate document.

**3.27** The following comments were directed towards the more detailed profiles for each individual Settlement Area:

**Settlement Area 1 - Wallasey**

**3.28** Comments on Settlement Area 1 were mainly directed towards:

- flood risk
- the progress of development in New Brighton
- the shortage of natural and semi-natural open space
- the need for investment and regeneration in existing centres

**3.29** A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
67	Agree with the portrait of New Brighton.
217	Agree with the portrait of New Brighton. Paragraph 2.78 - the new supermarket will be operated by Wm Morrison Supermarkets plc. This store is under construction and due to open in Spring 2011.
319	Paragraph 2.84 - there is still a risk of flooding should the Wallasey Embankment be breached or overtopped.
341	The Council should use the shopping surveys for Liscard, Seacombe and New Brighton funded by Objective One and New Wallasey SRB. Recent articles suggest that the Council only want to think about Wirral Waters providing all the shopping facilities for Wallasey. It would be wrong to ignore Liscard, Seacombe, Egremont, New Brighton and Wallasey Village. The Council appears to have given up on Seacombe, in terms of improving the main shopping area of Poulton Road from Gorse Lane to Lloyds corner.
382	Agree with the portrait of Settlement Area 1.
756	Paragraph 2.78 - Phase 2 is now underway. Phase 3 includes the Pier project and the Brand New Brighton Pier Feasibility Study (Faber Maunsell/AECOM, March 2009) should be referenced. Paragraph 2.81 should refer to the RNL seeking to relocate within the town. Phase 3 should be included in the list of Key Issues for the area.
822	North Wirral Coastal Park should be seen as a major wildlife area not just as a coastal promenade. The general lack of especially natural/semi-natural open space, away from the coast, should be identified. Opportunities should be taken to create more quality open space, even as green roofs. Sites of

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	high biodiversity are limited to the coastal strip but include the SSSI foreshores and the SBI coastal habitats at Wallasey Golf Course and North Wirral Coastal Park. The list of Key Issues should include protecting the wildlife associated with coastal facilities.
984	Regeneration of Newheartlands is laudable but only involves a like-for-like replacement of dwellings that will deliver little in the way of significant levels of economic prosperity and wealth.
OD2	Attention needs to be given to the rear exterior of shops on Liscard Crescent (McDonalds, Iceland etc) to reduce their visual impact and contain the litter belonging to the businesses.
OD3	Liscard shopping centre needs help and investment.
OD4	Liscard needs investment in housing.
OD5	Wallasey Village needs more attention, to reduce the impact of ugly buildings and to plant more trees, particularly evergreens like Holly and Holm Oak. The company who built the wind farm offered to sponsor tree planting in Wallasey Village but the Council turned the offer down. The trees are now on the motorway link road.
OD7	Serious investment is needed along King Street and Trafalgar Road to purchase and transform the derelict shops into residential properties, to prolong the life span of properties which otherwise would be scheduled for redevelopment. Promised improvements in this area have never materialised which has led to a defeatist attitude that “nothing ever gets done anyway.”

**3.30** The Council has responded to these comments by amending the Spatial Portrait and clarifying the role of existing centres in Preferred Option 12.

## Settlement Area 2 - Commercial Core

**3.31** Comments on Settlement Area 2 were mainly directed towards:

- flood risk
- the scale, impact and delivery of the proposals at Wirral Waters
- the status of the Wirral Waters Strategic Regeneration Framework
- the need for social as well as physical regeneration
- the future of Birkenhead Town Centre
- the lack of open space
- the importance of local heritage assets

**3.32** A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
42	Paragraph 2.126 - the date should read 1856. The original 1824 works were north of Wallasey Road.
114	Birkenhead has declined despite investment in regeneration. Supermarkets increasingly compete across a full range of goods. Birkenhead must be protected if Wirral Waters is to go ahead. Wirral Waters is welcome in principle but must create rather than transfer jobs; support maritime industries like Cammell Lairds and the ship repair yard at West Float; make full use of sustainable design and construction methods; be realistically accessible by public transport as the site is currently in a gap between existing networks and services; and the height of the development, which will be seen from much of Wirral and North Wales, needs to be carefully controlled.
144	As transport by ship has changed, the docks are no longer required. It seems sensible to fill in the water spaces or utilise them for water sport and recreation and re-use the buildings or build new. Wherever docks are preserved and re-used they have become valuable assets. Re-using vacant spaces for business and commerce often leaves dead space after closing time. Build houses and other recreational premises. Build for the young and old, growing and stable families. Modern business and manufacturing can exist side-by-side with homes.
318	Paragraph 2.99 - should read "...and James Gillespie Graham's original gridiron layout is still evident in the area outside the Conservation Area...".
319	Some of the key development sites at Woodside, Birkenhead Dock Estate and, to a lesser extent, Cammell Lairds, should be identified as at risk of flooding.
323	The Integrated Regeneration Study is not yet available. It is not possible to assess the implications of what might come forward at Wirral Waters and allied developments without it.
337	Pressing issues such as adult literacy; alcohol use (or abuse); claimant culture; and unemployment are not being appropriately addressed. Knocking down houses is not an answer to social problems.
400	Paragraph 2.122 - the use of the Wirral Waters Strategic Regeneration Framework is contrary to PPS 12 which says that core strategies must be justifiable and be founded on a robust and credible evidence base. This document has been prepared outside the plan-making process by a developer to support a particular proposal. It is not appropriate to use in the preparation of a statutory Development Plan.
501	Wirral Waters is part of a wider approach to major private investment in mixed-use regeneration at the core of the City Region, which includes the proposals for Liverpool Waters. The two projects are being progressed in

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	parallel as two elements of a single wider vision, which should be consistently cross-referenced. Other neighbourhoods emerging through the Strategic Regeneration Framework Vision and the Integrated Regeneration Study should be added to Picture 2.12. The proposals for Bidston Dock are less developed and should be replaced by a circular annotation, similar to that for Woodside.
660	The Council should sets out its own vision for the Birkenhead Dock Estate, as well as setting out what has been proposed so far. Links to the surrounding HMRI area should be stressed. PPS4 and the findings of the Integrated Regeneration Study must be fed into the Core Strategy at an early stage.
823	Paragraph 2.104 - the severe lack of open space needs to be addressed. The reclaimed landfill at Bidston Moss has limited access, which could be improved as part of the emerging proposals for the filled-in Bidston Dock. Only one access point (at the Bidston retail estate) has any car parking and the other (at Wallasey Bridge Road) is the only one with public transport access. There is a need for areas of green space near people's homes and workplaces. Important biodiversity is also effectively limited to Bidston Moss (and Cross Lane adjacent).
858	The development opportunities at Seacombe Village, Volclay Triangle and Wheatlands Corridor should be included.
883	Paragraph 2.93 - should say "recently constructed" Ro-Ro. References to "former" should be deleted from Cammell Lairds. Despite the decline in shipbuilding activity in the UK in recent decades, the Cammell Laird shipyard has revived as a ship repair facility and is a major ship repair centre for the UK West Coast and is an important port asset. The Liverpool SuperPort should also be referred to.
888	The complex of interlinking docks and surviving water spaces at Birkenhead are a crucial part of Merseyside's historic and cultural landscape. Their integrity should be retained and maximised for leisure and tourism activities. The corridors alongside these water spaces could become attractive walking and cycling routes improving access and vibrancy throughout the Wirral Waters site and its surrounding area.
961	There is no description of the Area's dock heritage.
973	Agree that the integration of Wirral Waters with the surrounding area is a Key Issue. The Spatial Options Report refers to high density development but the extent to which this will depend upon tall buildings, which could have a harmful effect on the setting of Hamilton Square and to a lesser extent their impact on Birkenhead Park, is not clear. Have called for a significant

	reduction in the height of the tall buildings cluster at East Float but it is not clear what impact this might have on the amount of development being proposed.
982	Paragraph 2.122 - Do not object to the overall regeneration of Settlement Area 2 but the Strategic Regeneration Framework for Wirral Waters should not be used. It does not form part of the adopted development plan, has been developed outside the planning policy framework by a planning applicant, has not been formally commissioned by the Council or as recognised planning guidance. It is not a robust and credible evidence base and should not be used as a material consideration. References to it should be removed.
984	Promoting Wirral Waters above all other areas is a dangerous strategy that will harm the wider needs of the Borough. Peel have competing ambitions for other sub-regional projects, including Ellesmere Port Docks, which are also of questionable commercial viability. The plans for Birkenhead Dock Estate are undeliverable; provide no discernible benefit; and are based upon the ambition to deliver a second "Trafford Centre". The idea of creating 27,000 new jobs through the development of high-rise office blocks is pure fantasy. The regional office market is firmly based in Liverpool, Warrington, Chester and Manchester. Birkenhead is a largely tertiary, industrial location that will always play second fiddle to Liverpool. The idea that Wirral suffers from a significant leakage of comparison goods retailing is quite ridiculous. A 20% leakage is low compared to other areas around Liverpool and Manchester and is to be expected given the ease of access to Liverpool One and proximity to other retail destinations like Cheshire Oaks and Chester. There is excellent sustainable access to Liverpool City Centre. Wirral is generally self-sustaining in terms of retailing and leisure and does not attract significant levels of inward migration. Wirral residents tend to gravitate towards Birkenhead, Bromborough or Heswall for key retail services. Another retail-led destination would only generate unsustainable trips from neighbouring authority areas. It is unrealistic to expect a change in planning policy to change attitudes and perceptions about this area. The area is practically devoid of population; it is not a desirable area to live in; there are few services and amenities (schools etc); and it is not an aspirational location. The attempt to attract and retain residential interest is bewildering: the market is not interested in this area and to suggest that the market will provide high density apartment living schemes is nonsensical; this is not New East Manchester. The market was not interested in Woodside even during "boom time".
1066	Not convinced about the impact of a mixed-use development of this scale. The environmental performance of tall buildings is questionable. Birkenhead's housing and commercial districts need to be revitalised but Wirral Waters will shift the centre of gravity of Birkenhead away from the existing centre, leading to lower value uses and a further deterioration in the living

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	environment of inner Birkenhead, with thousands of new residents at Wirral Waters putting further demands on local infrastructure. While we acknowledge the value of eye-catching development, we would prefer to see more, local, smaller developments where investment will create and retain economic benefits within the local area, particularly in disadvantaged areas. The Council should support Transition Initiatives in the most disadvantaged areas of the east of Wirral, as an additional mechanism for promoting social, economic and environmental change in some of the most hard-pressed communities.
1094	Given the shortage of jobs and the numbers that travel outside the Borough to find work, will not the new residents of Wirral Waters also join the numbers travelling farther a field, as only few could work in the institutions and shops proposed nearby?
1095	Employment opportunities should also be made available to local, long established communities.
OD8	The temporary car park at Conway Park should not be used for a casino and hotel development but should be made into a permanent full-time car park.

**3.33** The Council has responded to these comments by amending the Spatial Portrait and providing additional information throughout the Preferred Options Report.

### Settlement Area 3 - Birkenhead

**3.34** Comments on Settlement Area 3 were mainly directed towards:

- the need for employment
- the accessibility of public transport
- the need for affordable and specialist housing
- local heritage assets
- the need to protect biodiversity and open space
- the need to attract and retain high earners

**3.35** A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
53	Older people and people with mobility problems have greatly increased the demand for bungalows in this Area. These can often be built in small blocks divided from the land of larger houses. Grandparents (etc) can live in the bungalow with their children remaining in the family home adjacent. This would allow people to stay outside the state funded system for much longer. As infrastructure is already in place, the dwelling increases the Council's income with very little cost, allowing more to be spent on social projects.



115	<p>Birkenhead Park and Flaybrick Cemetery are key assets. Bidston Hill (and its windmill) and Bidston Observatory should be added. The future role of Bidston Observatory is a key issue. The key issue for heritage should include development, renewal and improvement to serve the community. Wirral's parks and open spaces have been in decline since the 1970's. The key issue needs to be re-phrased. The railway line from Bidston to Wrexham is grossly underused and does not provide a useful role. Electrification to Woodchurch would be a more practical objective with new stations at Beechwood and Woodchurch (with a new station, parking and a bus/rail interchange in part serving Arrowe Park Hospital) and a car park at Upton as part of a medium term strategy to electrify to Wrexham (with dual voltage stock). This would capture cross-Wirral car journeys to public transport.</p>
150	<p>The level of new building has not been enough to satisfy the growing need for affordable housing both to buy and to rent.</p>
300	<p>Welcome the recognition of historic buildings and settlements, including Oxtan Village. Welcome the inclusion of heritage protection in the list of key issues for this Area.</p>
338	<p>There is a need for rented properties in the private sector for young people leaving home for the first time, who cannot afford mortgages. People do not want housing on Bidston Hill, on school playing fields in Noctorum or on playing fields in Prenton and want to keep parks and greenspaces for recreation. Traffic pollution is a problem on main roads to Birkenhead at busy times. Access to public transport is an issue in places. Footbridges and stepped ramps at train stations at Bidston, Birkenhead North (for New Brighton/West Kirby trains) and Birkenhead Park are barriers to disabled people and wheelchair users. I like living here; but lack of employment remains a real issue driving up crime, drug use, theft and social disorder.</p>
702	<p>Bidston Village is important. Land in the M53 Corridor is currently used to farm, graze and ride horses and is crucial to maintaining the rural character and financial stability of Listed Buildings within the Conservation Area which has a nationally significant history . Local landmarks such as Bidston Windmill, Bidston Observatory and Lighthouse (as the birthplace of many fields of oceanography and one of the oldest weather stations in the country), Tam O'Shanter Farm, Leasowe Lighthouse, Fort Perch Rock, Conservation Areas, parks and open spaces and unusual items such as Bidston's underground air-raid shelters, should have an important role in building a strong tourism base, to respond to the downturn in industrial jobs and can become visitor centres and museums. Wirral Waters could be a catalyst to revitalise Wirral and bring foreign investment. When John Laird did something similar in 1824, parks, open space and places of interest were protected for the benefit of the community. An increase in farming is needed to reduce on imported food. Areas of existing farmland, such as the M53 Corridor which is also floodplain, should be retained and not developed. New</p>

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	development at Reeds Lane already has problems. Conservation Areas should receive protection. Prospective purchasers should be given leaflets setting out their responsibilities before they commit themselves.
824	There is a need for a greater variety of green infrastructure, especially semi-natural open space. Important biodiversity is centred on the Bidston ridge (Bidston Hill and Wirral Ladies Golf Course; lowland heathland and woodland SBIs) and on the southern edge of the Area at Prenton Dell and Claypit (SBI, species-rich grassland and ancient woodland). Birkenhead Park also supports significant biodiversity, especially bats. Biodiversity should be added to open space and playing fields in key issue bullet point 3.
984	Settlement Area 3 has a number of more positive attributes than Settlement Area 1 and Settlement Area 2. Birkenhead School, the only remaining independent school in Wirral, provides an opportunity to promote a centre of excellence. Educational objectives should be supported to promote excellence and attract development that will serve to harness and retain higher earners. The most successful regeneration projects across the UK retain higher value uses and people to use them as a platform to attract further high-end investment. Any restrictions on development should be avoided.
OD9	Support the lifting of the restrictions applied by the Interim Planning Policy for New Housing Development (October 2005) within this Settlement Area.
OD12	No housing should be allowed on Bidston Hill. The Proudman Oceanographic Laboratory should be used as a pilot project for a hotel.

**3.36** The Council has responded to these comments by amending the Spatial Portrait.

**3.37** The following site representation was also received:

ID	Summary of Responses Received
983	The Birkenhead School playing field at Noctorum Lane offers significant potential for meeting the growth needs of the area for residential and/or care/extra care with associated community provision. The site is bound by existing residential uses on three sides and would be a logical "rounding off" of the settlement.

## Settlement Area 4 - Bromborough and Eastham

**3.38** Comments on Settlement Area 4 were mainly directed towards:

- the relationship with the Rural Area defined in the (now revoked) Regional Spatial Strategy
- flood risk at the Manchester Ship Canal

- the impact of industrial uses on Eastham Village
- the impact of Croft Retail Park
- development at Wirral International Business Park
- local heritage and biodiversity

**3.39** A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
50	The character of Eastham village is already being damaged by commercial and industrial traffic using the village as a short cut for the oil industries, Vauxhalls, and dock-related activities. An increasing number of foreign trucks are ending up wedged in the narrow ancient roads. Further industrial development is proposed by Peel. The dock area needs to be accessed from the Motorway and not Ferry Road. Bankfield Drive needs to be closed to all but emergency traffic.
103	Paragraph 2.179 is supported. A meeting is needed to discuss the environmental impact of port and industrial operations on Eastham village and issues relating to Ellesmere Port Waterfront. The need to maintain the Ship Canal as a sub-regional intermodal freight terminal is supported as a key issue.
319	Flood risks will need to be assessed at the Ship Canal.
419	Settlement Area 4 should be redrawn to include land between Eastham and the M53. The land is in the RSS Outer Urban Area and the area has some of the most deprived population.
624	Eastham Village Conservation Area and Eastham Country Park are popular tourist attractions surrounded by Green Belt. Local industry is confined to land bordering the Manchester Ship Canal, now owned by Peel. The area of Peel land bordering Eastham residents in Seaview Avenue/Ferry Road should remain greenfield and undeveloped.
655	<p>Paragraph 2.180 - Croft Retail Park has reduced choice and led to empty properties in Bromborough Village and New Ferry. Local libraries, One Stop Shops and the Civic Centre in Eastham, Bromborough and New Ferry are vital services.</p> <p>Local distinctiveness is being eroded in Bromborough. The Scheduled Ancient Monument of Bromborough Court House has been increasingly marginalised. The Office Park next to Eastham Country Park is another regrettable decision, when buildings lie unoccupied in Wirral International Business Park. The Saxon Cross by the Parish Church is omitted. Open spaces should not be an easy target for Council economies.</p>
667	The Wirral Coastal Park proposals have been omitted.

701	<p>Further industrial development will increase poor air quality in Eastham Village. Increased pollution from traffic using the A41 from M53 junction 5 to Bromborough will also affect the health of local residents. No air quality readings are currently available for Eastham. Residents do not support the expansion of the Port and associated facilities at Eastham, which would have a detrimental effect on Eastham Village. The main entrance to QEII Dock is via Ferry Road, already polluted, with continental lorries and heavy construction vehicles gaining access to existing industries including COMAH sites via Bankfield. The port operator has not agreed to meet local residents and Ward Councillors. Bankfield should be closed permanently or flash recognition installed to obtain access. Eastham Village and Eastham Country Park are visitor attractions which need to be retained. The construction of a recycling plant (Biossence) will lead to unknown emission discharges and heavy traffic delivering waste from unknown sources with possible health and danger hazards. The karting track built in the Green Belt is causing excessive noise disturbance to areas of Eastham Village and beyond. Peel are exerting far too much influence over the Council.</p>
768	<p>Eastham should be added to the RSS Rural Area, to give it greater protection. It should not be excluded from this because of its geographical location on the East of the peninsula.</p>
769	<p>Eastham is a Conservation Area, mentioned in the Domesday Book. A long history of rural activity altered when the Ship Canal was built changing the nature of the area in spite of assurances and safeguards within the Act. National priorities were cited, when the QEII Dock was constructed in 1950, as a reason for another nail in Eastham's coffin.</p>
770	<p>A buffer zone is needed to protect Eastham Village Conservation Area and its surrounding countryside, as one of the few places where the original banks of the river Mersey may be seen, free from development.</p>
825	<p>Wirral International Business Park still suffers from inadequate public transport and causes local traffic congestion.</p> <p>Biodiversity includes major sites at Dibbinsdale SSSI and adjacent SBIs (ancient woodland and reedmarsh, much public access) and Eastham Country Park (woodland, rocky coast), New Ferry shore is SSSI and part of the Mersey Estuary RAMSAR. There is a need for greater investment in the country parks: Eastham is heavily used and Dibbinsdale needs careful management. Neither can take more visitors without investment. Smaller sites include Storeton Woods SBI (on boundary but heavily used by Bebington residents), New Ferry Butterfly Park (currently subject to CPO to preserve it) and allotments sites, especially at Kings Lane. Bromborough Dock Landfill may contribute over time. Erosion at the clay cliffs at Shorefields is maintaining a diverse flora. The foreshore is accreting with saltmarsh with a good variety of species. Key Issues should include maintaining the nationally important site at Dibbinsdale SSSI in good condition.</p>

1020	The need to maintain and enhance investment at the Croft Retail and Leisure Park should be a key issue, to maximise opportunities for employment. The Park is second only to Birkenhead as the most important comparison shopping destination (by turnover) and is an important asset in the ongoing regeneration and economic revitalisation of the southern part of the Borough. It is ideally placed to assist in the claw back of leakage to Liverpool, Chester and Cheshire Oaks. Congestion only occurs during exceptionally busy trading periods, such as Christmas and Easter. Long term remedial measures are being investigated to encourage the free flow of traffic around the Park including permanent part-time traffic signals and improvements to the easternmost junction of Caldbeck Road and Welton Road. New retail units in the north east area will deliver a new bus, pedestrian and cycle link to Stadium Road.
1097	Access to Wirral International Business Park for cyclists is poor.
1098	The former Bebington Town Map identified land 'south' of the QEII Dock for primarily industrial use including wharves, depots, and other land in industrial use connected with docks and waterways of traffic importance. It is now allocated as an Employment Development Site for B1, B2 & B8 employment uses. There should be a clear distinction between workshops, warehouses and fabrication and the scale and type of plant now being suggested in close proximity to homes. Under-utilisation of land over many years has led residents to reasonably expect a 'buffer zone' between the residential area and industrial development with an emphasis on 'amenity'. Residents have suggested a 600m buffer zone. Higher standards over where 'heavier' industries might be located are now normal and were recognised by the Council when "Special Category Industries" were ruled out before the UDP was adopted.
OD14	Existing employment and industrial development already overburdens Eastham Village Conservation Area, which needs to be protected from future, large scale industrial development in the Eastham area.
OD15	Paragraph 2.71 omits the pre-conquest cross outside southern door of St Barnabas Parish Church, which is also a Scheduled Ancient Monument.
OD17	Eastham Village borders land owned by Peel Ports, who have little or no sympathy with Eastham. Undesirable industries are being developed on their land with increased traffic pollution affecting the Village. A buffer zone is necessary.
OD19	Eastham needs a large buffer zone to be retained between any further industrial development.

**3.40** The Council has responded to these comments by amending the Spatial Portrait.

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**3.41** The following site representations were also received:

ID	Summary of Responses Received
773	The remaining open land opposite the Tulip factory should be re-zoned as amenity land and used for car parking for the proposed coastal footpath to prevent the excessive use of Eastham Village by motor vehicles wishing to gain access to the footpath.
774	The remaining open land, known locally as Slack Wood, should be re-zoned as amenity land. It contains the remains of the lost Wirral hamlet of Shodwell, which needs to be preserved, with a TPO instituted. It would be an ideal entrance to the coastal footpath.

## Settlement Area 5 - Mid-Wirral

**3.42** Comments on Settlement Area 5 were mainly directed towards:

- flood risk
- the need for a safe cycle route between Greasby and West Kirby
- the character of Upton town centre
- improvements to the Bidston-Wrexham railway line
- local biodiversity
- the need to focus development where facilities are already available

**3.43** A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
11	A safe cycle route is needed between Settlement Area 5 and Settlement Area 6 to link Greasby to Frankby/West Kirby to allow pupils to cycle to nearby secondary schools at Hilbre, Caldy and West Kirby and promote a more healthy lifestyle. Adult cycling and fitness would also be encouraged. The road between Greasby and Frankby /West Kirby is too narrow and too busy for safe cycling.
20	<p>Paragraph 2.204 - Greasby should be designated as a Conservation Area.</p> <p>Paragraph 2.212 - upgrading the Bidston-Wrexham railway line, manning the station and increasing the existing (50) park-and-ride spaces at Upton would open up the Deeside employment area to residents.</p> <p>Other annoying anomalies in Greasby include: the large brick pillar at the entrance to new dental surgery; narrow exit from library car park; bring-site/banks on corner of exit causing congestion and obscuring sight-lines; footpath FP/A needs clearance and wall restoration.</p>

319	Paragraph 2.218 - There is still a risk of flooding should the Wallasey Embankment be breached or overtopped. Welcome the identification of flood storage requirements.
339	The character of Upton is changing with more "down market" shops and people moving in from Birkenhead. There is a strong community but the Woodchurch estate still has its problems.
397	Believe the Government has already decided to abolish the Green Belt in 2026? What will the impact of using up more land be on climate change? The flood plains at Moreton have already been built on. Moreton District Centre would be a good site for a multi-purpose complex.
436	Electrification of the Bidston-Wrexham line, the creation of a new station at Woodchurch Road; safeguarding small local traders by limiting out-of-town superstores; preserving and enhancing the area's parks and open spaces; and providing more street trees and amenity open spaces are key issues.
768	Why is Moreton included in the RSS Rural Area?
799	Reference to 'surplus' playing fields at Fender Primary and St Michael and All Angels RC Primary needs explanation. Surplus under the Educational Premises Regulations does not mean that they are surplus in the context of national planning policy in PPG17. The loss of playing fields would be opposed unless specific exceptions could be met.
826	The current text does not mention biodiversity. This Area has few sites of high biodiversity, although the coast to the north and Arrowe Park serve parts of the area. Upton Meadow, Overchurch Park and Paulsfield Wood (all SBIs for woodland and bats) are therefore important. The key issue for North Wirral Coastal Park should include protecting biodiversity as well as promoting recreation.
984	Sustainable growth should be directed to Areas like this, where existing community facilities, amenities and infrastructure are already located, rather than focusing new residential development into Settlement Areas 1 and 2.

**3.44** The Council has responded to these comments by amending the Spatial Portrait.

## Settlement Area 6 - Hoylake and West Kirby

**3.45** Comments on Settlement Area 6 were mainly directed towards:

- new development in West Kirby
- Hoylake town centre
- the impact of a Golf Resort at Hoylake
- natural coastal processes at Hoylake

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- the impact of development restrictions
- the importance of biodiversity and open space

**3.46** A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
20	<p>Paragraph 2.228 - Business Rates are too high, apparently to "match" West Kirby. Until revised contraction will only continue.</p> <p>Paragraph 2.234 - Any economic benefit to the area provided by the 2006 Open Golf ended on the day they all went home.</p> <p>Paragraph 2.236 - both Hoylake and West Kirby are short of public halls. Westbourne Hall is currently booked for every Saturday for the next 11 months.</p>
42	<p>Paragraph 2.228 - Hoylake is the only linear settlement in the Borough, which is a barrier but not insuperable. Policies in Hoylake will need some lateral thinking.</p>
52	<p>Paragraph 2.234 - a Golf Resort would be an environmental disaster. The area is rich in wildlife with pheasant, gray partridge, lapwings, little owls, curlews, reed buntings, reed warblers, various hawks, brown hares, rabbits and many other species and is criss-crossed with a network of public footpaths and two cycle paths, which should be preserved. Encouraging travel on foot or bicycle would better support health and well-being and the battle against global warming.</p>
91	<p>West Kirby Concourse needs modernisation but there is no mention of improvements to the health, library, sports or social facilities or the proposal to provide a third of a million square feet each of new commerce &amp; business, housing (flats) and retail space. Concerned at the impact on Edwardian village ambiance, infrastructure, and the need for more retail jobs.</p>
113	<p>Restrictions on house building should be continued to maintain Victorian and Edwardian character. West Kirby Town Centre is fragile, overwhelmed by competition from supermarkets and internet shopping. Key local shops have already been lost. Introducing a new supermarket at the Concourse will cause further harm. Wine bars and eateries must be restrained, as in Liverpool, to prevent over-provision and the anti-social behaviour associated with Hoylake. Town Centre improvements are necessary. The pedestrian environment is poor. Traffic and parking are problems. Residential streets are swamped. Local improvements, improved parking and the retention of the Dee Lane car park would support independent retailers. Specific provision for minibuses, coaches and the disabled should be made. Visitors need to be encouraged by redeveloping the sailing school as a centre of excellence for coastal marine sports and as a coastal interpretation centre for Hilbre.</p>



	<p>A hotel should be provided elsewhere, at Kings Gap or Meols Drive. The cafe building at Coronation Gardens forms part of the character of the promenade and should be retained for families and visitors. Parks are under-funded, despite their role in health, education, exercise, community, events, biodiversity and minimally referenced. The Golf Resort will intrude into valuable playing fields, agricultural, wildlife and floodwater storage areas in the Green Belt, which should be improved for wildlife, recreation, allotments for local people and visitors. There is no mention of the Transition Town movement.</p>
142	<p>Paragraph 2.233 - the Lake wall was repaired not re-lined.</p>
157	<p>There is no proof that the Golf Resort will revitalise Hoylake or West Kirby as it will try to keep its patrons on site. Extra traffic and highway "improvements" etc., will detract from the character of Hoylake. The buildings at West Kirby railway station are a disgrace. The poor condition of West Kirby Concourse does not justify a huge redevelopment that will destroy the character of the town.</p> <p>Not enough is made of the threat of flooding and climate change in West Kirby and Hoylake. Tidal surges are expected on top of a 0.9m rise in sea-level.</p>
163	<p>Generally agree with the Spatial Portrait but there is more to infrastructure than schools and emergency services. There is no consideration of the capacity of infrastructure for water, energy, sewage or broadband.</p>
186	<p>Paragraph 2.233 - cannot endorse these plans.</p>
174	<p>The majority of residents do not want the envisaged 'tourist/golf based regeneration', which is only wanted by certain business sectors. These are, in the main, quiet residential areas and the focus should be on the natural environment and built heritage.</p>
231	<p>Paragraph 2.242 - it is unclear why sand accretion and naturalisation by spartina is identified as a key issue. The spread of Japanese knotweed and Himalayan balsam and other invasive species could have been given equal prominence, particularly with their associated treatment costs and impact on the timing, phasing and cost of regeneration projects. Dynamic coastal processes are to be encouraged. The value of salt marsh and sand dunes in reducing the impact of increasing storms (from climate change) should not be underestimated. The Shoreline Management Plan may help with these matters.</p>
251	<p>The key issues identified for Settlement Area 6 should be reordered and modified as follows:</p> <ul style="list-style-type: none"> <li>• Preserving and enhancing the distinctive character of the area to support a local sense of place.</li> </ul>

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	<ul style="list-style-type: none"> <li>• Preserving and enhancing the area's open spaces, including its parks and playing fields and the natural areas of Grange Hill, Caldly Hill, Newton Common and the Gilroy Nature Reserve; and promoting accessibility to the public.</li> <li>• Preserving and enhancing the area's distinctive coastline, including the Hilbre Islands, Red Rocks and areas of sand dune and open cliffs; and promoting accessibility to the public.</li> <li>• Preserving and enhancing the character of the Conservation Areas.</li> <li>• Promoting environmental and other improvements to the residential estates at Gilroy Road - Greenbank Road.</li> <li>• Safeguarding the future of local independent retailers.</li> <li>• Managing the service sector (pubs and wine bars) to limit the problems of anti-social behaviour.</li> <li>• Securing continued improvements to tourist and visitor facilities in West Kirby and environs</li> <li>• Promotion of the wind and water sports facilities of the area and the upgrading of the Marine Lake Sailing School</li> <li>• Redevelopment or refurbishment of the West Kirby Concourse</li> <li>• The extension of cycle routes within the area and the promotion of more sustainable travel choices</li> <li>• Promoting greater access to allotments</li> <li>• Promoting the Wirral Way and other green routes and upgrading the Wirral Country Park Visitor's Centre;</li> <li>• Promoting greater food self-sufficiency in the area</li> </ul>
437	<p>The key issues identified for Settlement Area 6 should be reordered and modified as follows: "Key Issues for Settlement Area 6 should be to build on the area's strengths by:</p> <ul style="list-style-type: none"> <li>• Promoting a 'sense of place' by capitalising on the area's strong sense of community and its local distinctiveness.</li> <li>• Preserving and enhancing the area's high quality environment, including its parks and open spaces and the natural areas of Grange Hill, Caldly Hill, Newton Common and Meols Common and the Gilroy Nature Reserve, Hilbre Islands, Red Rocks and areas of sand dune, beach and open cliffs.</li> <li>• Preserving and enhancing the character of the Conservation Areas and the area's locally significant built heritage.</li> <li>• Supporting small local traders.</li> <li>• Securing improvements to visitor facilities in West Kirby, Hoylake and Meols including provision of adequate car parking spaces and of public toilets.</li> <li>• Addressing the need to control the over concentration of licensed premises and hot food takeaways in both Hoylake and West Kirby.</li> <li>• Promoting the wind and water sports facilities of the area and upgrading the Marine Lake Sailing School</li> </ul>

	<ul style="list-style-type: none"> <li>• Promoting the Wirral Way and other green routes and upgrading the Wirral Country Park Visitor's Centre;</li> <li>• Promoting environmental and other improvements in areas of above average levels of deprivation. [Gilroy Road - Greenbank Road and the Carr Lane Estate]</li> <li>• Redevelopment or refurbishment of the West Kirby Concourse</li> <li>• Protecting employment uses at Carr Lane Industrial Estate and encouraging the replacement and refurbishment of older premises and the creation of more floor space.</li> <li>• Promoting the needs of pedestrians, cyclists and public transport users and encouraging the provision of more sustainable travel choices</li> <li>• Provision of enough allotments to meet local demand.</li> <li>• Safeguarding the area's High Grade Agricultural Land</li> </ul>
652	<p>The decline in Hoylake is due to lack of local demand as a well as investment. Very little new housing has been built in the last ten years. The four new shops on Market Street, vacant since completion, indicate a misguided policy which prevents new housing but not unneeded shops. New investment is needed to facilitate the consolidation of the centre and to unlock tourism potential. The environmental improvements already secured on Market Street are very welcome. The Friends Group have been active in further improving the appearance of Market Street and Birkenhead Road. Improvements to the promenade and related gardens and open spaces between Hoylake and Meols are urgently required. The very significant archaeological and historic importance of the Meols and Hoylake coastline should be reflected.</p> <p>Paragraph 2.232 - should refer to the sand yachting club and the model boat club in Hoylake.</p> <p>Paragraph 2.233 - should refer to the relined boating pool and the European sand yachting championship held in Hoylake in 2007.</p>
703	<p>A loss of public parking will result from the new Aldi development (which we welcome) and the proposed Dee Lane Hotel project. The re-development of the Concourse could also lead to increased parking demand or reduced spaces in an area being promoted for visitors. Ashton Park, a popular tourist destination, and the other smaller parks at Coronation Gardens, Victoria Park, Sandlea Park are not mentioned. There is great shortage of allotment plots (the Newton and Grange sites have the longest waiting lists in the Borough). The Golf Resort proposal should recognise support the use of the area for farming and recreation and preserve and increase its importance for birds and wildlife. The intention to protect local employment uses is welcomed. The Marine Lake Sailing School should be re-furbished rather than re-placed. A hotel and more shops on the site of the current Dee Lane</p>

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	<p>Car Park is not supported. West Kirby is essentially a day trip location. The view of the Welsh Hills along Dee Lane is what many visitors remember about their visit to West Kirby.</p>
757	<p>A tourism regeneration focus around West Kirby and Hoylake needs to be supported by allowing building on infill sites and other derelict areas.</p>
796	<p>The "Golf Resort" is high quality agricultural land in a flood plain in the Green Belt appears to be the "only idea" for Hoylake. Support for existing golf clubs and hotels would be a better option. The West Kirby Sailing School used to be a private business, run with no cost to the taxpayer. Has the current Council-run Sailing School been run at a profit or a loss to the taxpayer? The "Sail Hotel" scheme seems to be the only "tourist" attraction planned for West Kirby, to try and get someone to build a new Sailing School, implying that the Council has failed to maintain this comparatively new facility. Will there be a chandlery to provide the necessary "bits" to support the local sailing? A range of proposals should be presented and the cost options made public.</p>
827	<p>Paragraph 2.234 - enthusiasm for a new Golf Resort should be tempered by the associated difficulties of wildlife value, legally protected species, flooding, high grade agricultural land, farmland loss, Green Belt and much local sentiment.</p> <p>Many sites of high biodiversity value are not referred to: Dee Estuary SPA/RAMSAR/SAC, Red Rocks SSSI, Hilbre Island SSSI/LNR, North Wirral Foreshore SSSI/SPA, Royal Liverpool Golf Course (sand dune SBI), Caldy Hill (heathland/woodland SBI), Wirral Way SBI, as well as smaller sites. Grange Hill is likely to lose its SBI status for lack of management. The birdlife of the estuary and foreshore is also a significant tourist attraction in autumn and winter.</p> <p>Paragraph 2.242 - there is no discussion of sand accretion, which is likely to continue for some decades. Shoreline Management Plan 2 should be cited. Positives include new sand dune and saltmarsh habitats at Red Rocks and around the coast, reduced costs of sand clearance from roads and protection of the sea wall and coastal properties from storm surge and storm damage by decreasing wave energy. Negatives include loss of sandy recreational beaches, difficulties of access by sailing clubs and public perception.</p>
859	<p>Reference should be made to the new Aldi development at Bridge Road, West Kirby. 'Open Golf Tournament' should be changed to 'Open Golf Championship'. A Future Golf Resort Detailed Needs Assessment (Capita Symonds, November 2006); A Future Golf Resort Technical Assessment (Capita Symonds, August 2007); West Kirby Public Realm Improvements Report (Atkins, December 2007); and Hoylake and Meols Promenade</p>

	Masterplan (Scott Wilson, March 2009) should be referred to. 'The Sail' hotel project; public realm work in West Kirby; and the Hoylake and Meols Promenade work should be added to the list of key issues.
931	Paragraph 2.242 needs to be clarified. The term 'tourism' is used very loosely to cover both day trippers and overnight visitors. Providing for these two groups raises quite different issues. Nowhere is it stated that the overwhelming need is to provide for day visitors, which requires minimal regeneration. Paragraph 2.227 does not indicate any major need. This certainly does not require the development of a Golf Resort, for which no reasoned justification is given. Nor is it explained why the proposed site needs 'environmental regeneration'. The Golf Resort is not a key issue but an unsubstantiated proposal. The yellow star under the word 'Hoylake' should be removed from Picture 2.21. The key issue with regard to older people should also apply to West Kirby or, if not, be explained.
984	There is limited scope for new development because of physical constraints but there is a need to address limited growth needs so that the area does not become dormant and slowly unsustainable.
1016	The new Hoylake Lifeboat Centre and the new model boating lake, which is also a growing attraction for visitors, should be mentioned. Sand yachting, para karting, the 2014 Open Golf, 2012 Women's Open and 2013 British Boys Championship are omitted.
1110	Generally agree with the Spatial Portrait. Open space is important and should be protected and managed to continue to meet the (increasing) demands of users.
OD22	The plan should not exclude continued development/regeneration of West Kirby as a town centre, including tourism and accommodation provision.

**3.47** The Council has responded to these comments by amending the Spatial Portrait.

## Settlement Area 7 - Heswall

**3.48** Comments on Settlement Area 7 were mainly directed towards:

- traffic and congestion
- the use of public service buildings
- the scope for a new railway station at Chester Road
- the need for additional or multi-purpose open space
- care housing and a balanced community

**3.49** A summary of each of the comments received is set out in the table below:

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ID	Summary of Responses Received
173	<p>Paragraph 2.264 - first bullet point - reference to higher quality residential areas is elitist and divisive. The whole of Settlement Area 7 should have its attractiveness preserved.</p>
186	<p>Paragraph 2.246 - Many public services appear to operate from buildings which are underused: a Council report identifies the Adult Learning Centre is underused; the ambulance station is now used by only one ambulance; the fire station is only used by one fire engine; the police station car park seems larger than necessary. There is potential to rationalise some or all of these sites along with Heswall Medical Practice and Heswall Clinic. The town centre also contains many poor buildings including the corrugated iron structures on Moor Lane. The future of Heswall Hall and Alexander Hall remains to be determined. The Medical Practice in Rocky Lane is due to relocate to Thingwall. The former Pensby Park Primary School seems underused and Stanley Special School may be relocated. The former car showroom on the corner of Pensby Road and Irby Road is vacant.</p> <p>Paragraph 2.250 - The loss of the Doctors Practice will harm the viability of Irby Village Centre.</p> <p>Paragraph 2.251 - The village shops in Heswall Lower Village which integrate with St Peter's Parish Church and Centre to create the heart of the Conservation Area should be referred to.</p> <p>Paragraph 2.253 - The present UDP makes reference to traffic by-passing Heswall. Congestion is getting worse at the intersections with Telegraph Road at Pensby Road and Rocky Lane South and would deteriorate further if a new Medical Centre were built opposite Tesco. A by-pass should be considered.</p> <p>Paragraph 2.253 - Increasing congestion on the A540 link to the A5117 and M56 and A5137 Clatterbridge roundabout is isolating west Wirral.</p> <p>Paragraph 2.254 - A new railway station on the A540 would provide a very attractive location in transport terms but would need to be developed without causing further degradation of the Green Belt. The railway at Chester Road is well below ground level and a station might easily be concealed. Arranging for parking so that it would not impact on the Green Belt would be a challenge but not insuperable. The nearby garden centre is for sale.</p> <p>Paragraph 2.258 - A range of accessible facilities for a wide range of cultural and other activities needs to be retained if the "dormitory function" of the area is to be sustained. Facilities will be increasingly required for an ageing population less likely to travel.</p>

828	Biodiversity includes the Dee Estuary SAC/RAMSAR/SPA, Heswall Dales (heathland SSSI), Wirral Way SBI and a few smaller sites such as The Beacons woodland/heathland SBI. The heathland sites need management, made more difficult by the urban context. There is a constant problem with funding. A key issue is how to sustain Heswall Dales SSSI in good condition.
984	There is a need to support higher levels of growth to address the need for "care housing" and to maintain a dynamic, mixed and balanced community.
1111	As the level of provision of recreational open space and publicly accessible open space is one of the lowest in Wirral, the key is not just to secure its protection but to increase the amount and ensure it is well managed to provide multi-functional benefits.

**3.50** The Council has responded to these comments by amending the Spatial Portrait.

### Settlement Area 8 - Rural Areas

**3.51** Comments on Settlement Area 8 were mainly directed towards:

- the role of agriculture
- the need to acknowledge issues in individual villages
- the treatment of Areas Requiring Landscape Renewal
- the need for development to meet local housing, employment and recreational needs
- the hospitals at Arrowe Park and Clatterbridge

**3.52** A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
116	The Merseyside Rural Study and local and sustainable agricultural production is not mentioned. Market gardening should be restored, with greenhouse cultivation based on renewable power. Land used unproductively for horses should be used for agriculture, market gardening and allotments. Areas Requiring Landscape Renewal such as the Birket Valley provide valuable space for wildlife, nature, biodiversity, recreation, education and visitors as well as serving as Green Belt and should be nurtured to fulfil these roles more effectively. A Golf Resort would destroy this role. The Landscape Character Assessment Birket Floodplain Farmland paper should focus more on developing wildlife and nature for locals and visitors as part of a wider Dee Estuary wildlife zone, with trees and copses, flooded areas and scrapes for waders, ducks and geese.

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117	<p>The Green Belt needs to be vigorously protected and developed for agriculture, market gardening, sustainable and recreational pursuits. Areas Requiring Landscape Renewal such as the Birket Valley need to be improved and their links with other wildlife areas protected such as the Birket Valley/Dee Estuary linkage. Action to encourage and protect endangered species is necessary.</p>
186	<p>Paragraph 2.271 - Degradation needs to be addressed in the urban fringe including the subdivision of larger plots into small areas with often unsatisfactory fencing; rubbish and other debris; some horse based activities; and the transition of "garden centres" to other uses.</p> <p>Paragraph 2.286 - Consideration needs to be given to coastal erosion in areas which have previously been used for waste disposal such as at Dawpool, which could lead to coastal pollution and expensive remediation.</p>
347	<p>The generally high quality of the Spatial Options Report is diminished by the broad brush approach to Settlement Area 8 and the perception that it merely incorporates areas not already referred to and in the Green Belt, which fails to address the specific issues affecting the villages. There is no recognition that Frankby lies between Settlement Area 5 and Settlement Area 6 on the B5139, which the Council has sign-posted as the main route to West Kirby. The character of the village and Conservation Area is significantly affected by the volume, weight and speed of traffic, impeding the working farms and causing danger to horses that help to maintain it. It is surprising that reducing the impact of traffic on the conservation villages is not identified as a key issue.</p>
371	<p>The Settlement Area boundaries have been tightly drawn around the existing urban areas. Land within Settlement Area 8 will be required for urban expansion to meet the housing needs set out in the RSS. The need for urban expansion should be a key issue.</p>
655	<p>Further erosion of the Green Belt should be avoided.</p>
829	<p>Picture 2.23 and 2.24 are poor and do not show major roads, railways etc., which makes difficult to interpret. Agriculture may not be important in GVA terms but will become increasingly important to food security, as oil costs rise and the need to reduce carbon emissions increases.</p> <p>Paragraph 2.281 - there are also many smaller sites (mostly SBIs but also The Dungeon SSSI), including many in private hands, which also need protection. Biodiversity should be a separate heading, not lost under Recreation.</p>
860	<p>The Thurstaston Visitors Centre project and the Wirral Country Park Improvements Study (ATKINS, March 2006) need to be referred to.</p>



878	<p>The need to accommodate the economic restructuring of agriculture is agreed.</p> <p>Support the aspiration of meeting specialist local housing needs in Thornton Hough. Raby, Brimstage and Storeton should also be included.</p> <p>The long term character and sustainability of the villages is threatened by restrictive planning allocations, such as Green Belt. The careful management of change must continue to sustain and preserve the character of these areas and their relationship to the surrounding countryside. Each of these settlements has potential for: farm expansion and diversification; rural enterprise and live/work units; community woodlands; sustainable drainage; a mix of uses to promote and sustain the local agricultural economy including countryside recreation/tourism opportunities, conversion and retention of existing buildings, the demolition and rebuilding of unkempt agricultural outbuildings, sustainable building techniques, renewable energy production including anaerobic digestion plants and wind turbines. Key long term farmsteads should be able to expand with modern facilities to meet livestock, welfare, farm produce and farm waste requirements incorporating renewable energy production where economically viable. The use of redundant farm buildings and farmsteads should be allowed to combine a balance of residential and commercial uses in an economically viable manner so that they can continue to contribute to the rural economy. Housing, employment and leisure development is needed to meet the issues identified in the Taylor Report. A sound rural economy is vital if the rural area is to continue to provide a 'green lung' for the enjoyment of the adjoining urban communities. The Wirral Estate can ensure a coherent approach to future investment.</p>
984	Sustainable growth and expansion should not be ruled out.
1093	<p>The hospitals at Arrowe Park and Clatterbridge, which are important major employment sites jointly employing in excess of 4,500 people, are both referred to in a subjective and negative fashion in relation to parking and congestion. The Trust Travel Plan has introduced a range of initiatives to lessen reliance on the private car, improve public transport and parking on site, including a financial initiative to encourage commuting by bicycle. A Park &amp; Ride service is run between the Sainsburys Upton Store and Arrowe Park Hospital every 20 minutes from 9.30am to 5.00pm Monday to Thursday and on a Friday 9.30am to 12 Noon. Barrier control and designated car parking for patients and visitors has been introduced at the entrances to the hospital. Each car park has a 20 minute free period which allows visitors to drop of relatives and exit the car park without charge.</p>
1112	The attention given to landscape character issues and the changing face of agriculture are welcome.

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**3.53** The Council has responded to these comments by amending the Spatial Portrait:

**3.54** The following site representations were also received:

ID	Summary of Responses Received
313	Land in the Green Belt at 41, 51 & 59 Thurstaston Road, Irby would create a natural continuous residential boundary between Lyndhurst Road and Thurstaston Road. The larger of the above properties is a brownfield site occupied by a large agricultural contractor's yard.
379	A vacant previously developed site in the Green Belt at Saughall Massie could provide affordable housing for local people. The site an infill site between two areas of the same settlement and development would advance into open countryside.
419	Land between Eastham and the M53 should not be shown as open countryside in Settlement Area 8. The land is in the RSS Outer Urban Area and the area has some of the most deprived population. The Green Belt to the south of the M53 will still create a continuous break between the built up areas.
480	Two sites are proposed for residential use on Broad Lane, Heswall. The paddock adjacent to the bungalow named Sandymount in Broad Lane Heswall and the Latchgate plots off Broad Lane Heswall. These plots, adjacent to Mostyn Avenue, lend themselves to affordable housing which will bring younger people into the area. Another option would be a residential home, badly needed on this side of the Wirral.
481	A site is proposed for residential use on Broad Lane, Heswall at The White Housefield known as 'Harrow Hey' The plot is ideal for affordable housing with bus service and two primary schools within walking distance and the need to improve on the social mix on this side of the Wirral.
1055	Land adjacent/north of 98 Pipers Lane, Heswall currently designated as Green Belt, Area of Special Landscape Value and Site of Local Biological Importance SBI in the Unitary Development Plan could accommodate up to 30-35 residential dwellings and/or care/extra care facilities. The SBI is no longer relevant.

## Other Responses to Consultation Question 1

**3.55** The other responses to Consultation Question 1, that could not easily be directed towards an individual Settlement Area, were mainly directed towards:

- the role of agriculture
- the impact of the Council's Interim Planning Policy for New Housing Development
- the need for additional information on environmental assets

- the need for an assessment of indoor sport
- a greater emphasis on tourism potential

**3.56** A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
44	The moratorium on new house building has contributed to economic and population decline. Building workers are having to find work outside the peninsula where new housing is still encouraged, such as in North Wales. Continuing this policy will lead to a steady decline in Wirral's housing stock and would be bad for climate change. Warmer, better insulated homes, with better use of living space are far more carbon-neutral. A more flexible approach would allow more people to stay in the districts which they prefer and close to their places of work.
61	This Spatial Portrait is very specific and generally sound in its conclusions.
117	The role and profile of agriculture needs to be raised. Market gardening has declined but the land still remains and could help to deliver a more sustainable local economy, with renewable energy powered greenhouses and allotments. The Green Belt needs to be rigorously maintained. The impact of supermarkets and out-of-town retail parks has not been addressed. Local centres should be protected. Developer-led regeneration is a flawed approach and needs careful control. The Merseyside Rural Study, Open Spaces Assessment and the biodiversity assessment for the Golf Resort have not been used and up-to-date data is lacking for biodiversity, nature and wildlife assessments.
186	Broadly agree with the Spatial Portraits. Pleased to see the electrification of the Bidston to Wrexham railway in the Local Transport Plan. Concerned that references to more frequent diesel services might be seen as an alternative or lead to it being deferred. Electrification and integration with Merseyrail needs a much stronger emphasis and will be essential as road traffic grows to support the dormitory function west Wirral. The electrification will need to be accompanied by new stations and parking.
187	There is no reference to cultural provision in the various Settlement Area portraits, apart from the possibility of the transfer of facilities to community groups.
231	Environmental assets should be set out in a similar level of detail to provide a better balance with social and economic aspects. A summary of the Green Infrastructure within each Settlement Area would be the best way to include this.

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249	Agree with the Spatial Portrait. The drop in GVA/head is attributable to the out-migration of middle and high income families as a result of restrictions on development and the lack of quality new residential development in Settlement Areas 4, 5, 6 and 7.
268	It may be beneficial to provide some waste management information in the key statistics section for each of the Settlement Areas.
435	Agree in broad terms with the Spatial Portrait.
467	Agree with the Spatial Portrait.
471	Agree with the Spatial Portrait.
547	The Mersey Coastal Park proposals will enhance the economic importance of the coast in Settlement Areas 3, 4 and 8 and help to regenerate coastal communities in East Wirral in ways that safeguard, restore and make sustainable use of the natural, built and cultural heritage assets of the Rock Ferry to Eastham coast in line with Regional Spatial Strategy.
567	The Authority neglected to provide details of housing issues in Settlement Areas 6, 7 and 8. Restrictive housing policies have resulted in issues over tenure, mix, size, affordability and adaptability with implications for health, education, employment, migration, population and retail expenditure. The concentration on deprived areas should not be at the expense of other issues facing the existing and future residents and businesses. The Authority should not seek to enhance as well as preserve these Areas.
628	Themes and issues are not translated into policy and could be edited out. A chapter could be developed outlining areas of change, setting out how the areas will develop, using diagrams along the lines of the Core Strategies for Halton and St Helens.
649	The amount of employment and housing development that will occur within different areas/locations should be set out with information about how this will be phased across the plan period.
716	Agree with the Spatial Portrait.
776	Wirral has an incredible tourism potential. It is essential to list potential tourism attractions and places of interest. Wirral is a very beautiful place to live with ancient villages, a magnificent coastline, magnificent views from Thurstaston and Bidston Hill across Liverpool Bay, the Welsh Hills and the Dee and Mersey Estuaries, with fine sunsets, a good road and rail network and air temperatures about 2 degrees higher than the surrounding areas. This all needs to be kept free from housing development. A transport system is needed around the coastline.

776	Liverpool is thriving and Wirral should do more to capitalise on this link. Wirral has been hemorrhaging jobs and population. Small businesses are finding it difficult to survive. Parking charges destroy local traders and discourage customers. Shopping areas are becoming ghost towns. Schools are closing. Many new properties remain unoccupied. Older properties are being demolished destroying local character. Wirral Waters offers a very positive long-term opportunity but needs a suitable setting to enhance their investment and international marketing strategy. A new industrial base needs to be encouraged. An alternative technology park, responding to climate change and global warming would bring long term job prospects.
776	Relocating the Town Hall could prevent costly travelling between Birkenhead and Wallasey, preserve the Town Hall in Hamilton Square and consolidate administrative offices to make them more accessible to the public. The number of Councillors could be reduced to save money and expenses.
799	Welcome sport and recreation as key issues in a number of Settlement Areas. It is not, however, possible to confirm whether these are the right issues in the absence of an up-to-date Playing Pitch Assessment and an assessment of indoor sports facilities. References to indoor sports facilities being made available for 'community transfer' requires further explanation.
821	There is a lack of consistent evaluation of biodiversity in each of the Settlement Area profiles. The open spaces mentioned appear to be chosen rather haphazardly and do not include private land, even where this has high biodiversity value. The lack of designated wildlife sites in Settlement Areas 1, 2, 3 and 4 is because they do not exist. It is unlikely that many significant sites will be discovered in these areas. The lack of sites could only be addressed by serious habitat creation which would take resources, skill and time and still be difficult. The protection of existing wildlife sites is stressed precisely because they are so difficult and, for some habitats, impossible to re-create.
906	The level of information on natural environmental assets is low. Brownfield sites can also make a contribution to biodiversity. There should be a greater description of the importance of green spaces and the presence and condition of biodiversity assets. None of the sub-headings directly relate to the natural environment and there is only passing mention within other sections such as recreation and culture.
961	The sections on "local heritage" are welcome but however it only go part of the way to characterising the architectural and historic interest of the local environment. It does not, for example, enable an understanding of the local distinctiveness of the un-designated assets identified as important to local people.

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984	Development in Settlement Areas 1 and 2 would require significant public funding. Development in Settlement Areas 3 to 8 would require limited public intervention. Sustainable, accessible growth should not be discounted in Settlement Areas 3 to 8.
1125	Support the inclusion of these detailed descriptions of the different areas of the Borough, as these give an excellent summary of the local issues. However, these could be scaled back at the next stage to focus on key issues or be removed to a supporting document.

**3.57** The Council has responded to these comments by revising the Core Strategy Spatial Portrait, amending the Preferred Broad Spatial Strategy and by consulting on preferred options for the scale and distribution of new housing development in the Preferred Options Report<sup>(7)</sup>.

## 4 Spatial Vision

**4.1** The following sections set out comments received in relation to the amended Spatial Vision, including the responses to Consultation Question 2 - *Do you agree with the amended Spatial Vision for Wirral? If not, please give the reasons for your answer and indicate how you think it could be improved.*

### Developing the Vision

**4.2** Comments on the development of the Vision were mainly directed towards:

- alignment with the (now revoked) Regional Spatial Strategy and the division of the Borough into three areas
- the need for more distinctly Wirral-based elements
- the place of community facilities such as places of worship
- the treatment of Settlement Area 8
- the content of some of the background documents and their summaries
- the need for a greater environmental focus

**4.3** The following comments were received on the way the Vision has been developed:

ID	Summary of Responses Received
12	Disagree with the division into only three areas. Settlement Area 5 has "the highest concentration of need outside Birkenhead and Wallasey". Settlement Area 5 will be even more neglected in the same division as Settlement Area

7 Preferred Option 4 - Broad Spatial Strategy; Policy Options PO1 to PO4 and Preferred Option 5 - Local Housing Targets; and Preferred Option 6 - Distribution of Housing refer

	6, which has some of the lowest needs. Other than the artificially drawn line along the M53, there is no logic whatever in excluding Settlement Area 5 from the "RSS Outer Area."
62	Whilst sensible to split the Borough into three, a more balanced approach should be supported to allow new housing development across all areas as well as the sensible redevelopment of run down areas. Green Belt should be retained unless required to support future building numbers.
227	Hard not to disagree with the generalities of the Spatial Vision but there is little there that makes it distinctively Wirral as opposed to any other post-industrial borough with some Green Belt. The Local Area Agreement story of place is much more about Wirral. The vision must be more about developing built and natural assets in a sustainable way - why will people want to stay and why should businesses and people come to a little peninsula on the NW of England on the periphery of Europe? It also needs to take a clearer view on the strategic value of the Green Belt, an asset is of economic significance. There is clear evidence that it is easier to construct rather than fill buildings and the Green Belt (providing an attractive place to live and work) can make this a more attractive destination than competing locations elsewhere in the UK or Europe.
312	Paragraph 3.19 - the reference to a strong and vibrant voluntary and community sector is supported but could be made more explicit within the Spatial Vision by including a statement such as: "You will be in easy reach of facilities allowing you access to employment, education and training, shops, places of worship, leisure, sport and open spaces". The reference to "places of worship" would align more closely with Planning Policy Statement 1: Delivering Sustainable Development, which states that "Plan policies should ... take into account the needs of all the community, including particular requirements relating to ... religion". This would be achieved in the context of easy access to community facilities, which would by definition include places of worship.
497	RSS Policy RDF1 sets the context for Wirral's spatial strategy, focusing development in the inner areas of the regional centre as second priority in the region. In Wirral, Birkenhead forms the inner area. RSS Policy LCR1 sets out general priorities for the Liverpool City Region. Policy LCR2 deals with the City Region inner areas focusing residential development on these areas. Policy LCR3 deals with the outer part of the City Region. Policy RDF2 and Policy LCR4 set the policy for the rural areas. The Development Principle Policies DP1 to DP9 also need to be taken into account, including spatial principles, promoting sustainable communities, promote sustainable economic development, making best use of existing resources and infrastructure, managing travel demand, increasing accessibility, marrying opportunity and need, rural issues, promoting environmental quality and addressing climate change.

504	<p>The Settlement Areas do not fully align with the RSS Inner/Outer Area boundaries. A greater distinction should be drawn between the Inner and Outer areas in the Spatial Vision. Support Settlement Area 2 providing an enhanced and revitalised sub-regional centre as the retail, service and cultural centre of choice for all the Borough's residents. Both East Float and Bidston Dock should be defined within an expanded sub-regional centre boundary, within which there would be three different types of centre performing different roles - the core town centre of Birkenhead; the leisure/retail destination at Bidston Dock; and the business/living quarter (with ancillary retail/leisure/culture etc) at East Float. Each is linked to the other and would facilitate the regeneration of surrounding areas by attracting greater economic investment and population to the area. Paragraph 3.44 should refer to the SuperPort, Liverpool John Lennon Airport, the Port of Liverpool, Manchester Ship Canal and Liverpool Waters as other initiatives within the City Region.</p>
544	<p>The Spatial Vision is vague on Settlement Area 8. The focus on Settlement Areas in the Vision and then on the Inner, Outer and Rural areas in the consideration of spatial options is difficult to reconcile.</p>
674	<p>Need an approach that will provide training and job opportunities for unskilled, unemployed people, including those lacking basic literacy and numeracy, and encourage motivation and better health. Some people are, despite transport provision, inflexible over the location of work.</p> <p>The Baseline Option (paragraph 3.6) is more realistic and offers time for the local authority to continue to enhance work skills and life chances of the unemployed and redundant while maintaining programmes for urban renewal, by refurbishing and modernising older properties rather than the unfortunate, wasteful and expensive demolition. Some of the replacement dwellings appear to be mean in size, crammed on sites, unappealing in appearance, with no or little green space. This Option also gives more time to consider green issues including Green Belt protection, promoting parks and open spaces, provision of allotments, careful husbandry, best agricultural practices and a fresh look at eco-tourism. Flood risk must be taken very seriously.</p> <p>Paragraph 3.32 - the archaeological and historical heritage of Wirral is best served by a continued pro-active co-operation of the Council with local groups and the ability to make an informed and effective response to threats of encroachment, neglect and marginalisation of Wirral's unique cultural inheritance reflected in each area's special character. Business interests should be channelled into what is locally possible and desirable, not offer carte blanche to speculation, and always respect our historic environment; to avoid a permanent detrimental effect on quality of life. A reasoned, balanced approach must be sought. Wirral International Business Park needs a more friendly and respectful approach to historic legacy. A proper planting scheme along the A41 is long overdue for the drab, oppressive</p>



	views of parts of the Business Park. Wirral Waters is over ambitious; the Council being tempted to agree with an untested scheme. The 'Golf Resort' has the potential to destroy a valuable ecological site.
987	Particularly welcome: the recognition and understanding of Wirral's role and contribution to the Liverpool City Region and the need to align with strategies at this level; the clear identification of strategic sites and visitor economy opportunities; recognition of the Multi-Area Agreement; recognitions of the transformational actions that we think will drive economic growth over the next 20 years; a strong Spatial Vision recognising the need to attract investment and high quality jobs; and a strong evidence base that recognises the significant gaps in economic performance which need to be addressed. These are well aligned with the City Region evidence base.
1012	Economic performance gaps are well articulated but the evidence relating to overall economic productivity is light. While the development pipeline, including Wirral's key infrastructure priorities, will do much to increase job opportunities, it will do little to drive up productivity and wealth per employee, which will generate additional demand and increase the competitiveness of Wirral as an investment destination.
1034	The Spatial Vision is unclear on the statutory requirement to pursue sustainable development. PPS1 requires an integrated approach where economic, social and environmental objectives are achieved together over time. There is a significant disparity between the number of elements and their detail. The Vision seems to pay scant regard to environmental objectives. Of the 16 points only Point M is environmental. It is also unclear how last year's consultation has influenced the Vision that has now emerged. There is no vision for Wirral's landscapes - Natural England's 2007 assessment was that the Wirral landscape was a 'diverging'. The role of heritage should be much more influential and the approach to climate change adaption needs to go beyond new built development and include implications for green infrastructure, such as wildlife corridors, to enable species to adapt by migration.
1061	There is no record of the values on which the Spatial Vision has been based beyond describing how the vision has been developed from a series of background documents which together provide substantial impetus towards a Core Strategy that does not adequately balance economic development with other, less well investigated and more important concerns. The unquestioning assumption of economic growth pays insufficient regard to global resources limitations; the need for a rapid shift in commercial, industrial, social and domestic carbon performance; the need to deal with the causes and impact of climate change; and shifts in the balance of economic power across the world. The primary aim of the Sustainable Community Strategy and the Local Strategic Partnership is to deliver economic goals. Health, community, environment, culture, education are

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	<p>given secondary importance. The financial rewards of economic development are not an end in themselves. Priorities should include families and friends; their health and wellbeing; the state of the planet and human conflict; human relationships; cultural lives and physical activities; engagement with the rhythms and cycles of the natural world; the quality of the living environment; a sense of personal and community engagement and security; intellectual and spiritual fulfilment; and not compromising future generations. Building resilience needs to support community life, using principles that reflect naturally resilient ecosystems, to build low carbon, energy efficient human settlements. Energy, food and the inter-connected social, economic, cultural and technical components of healthy, functional communities need to be made more resilient. Systems able to resist sudden shock show diversity; a modular structure that absorbs damage so that the whole is not compromised; and have feedback mechanisms to identify developing problems before they become too big. The strategy should be a more complete, rounded, flexible, responsive and resilient to reflect core concerns, beyond financial security. A Core Strategy dominated by single-minded, growth-oriented, economic development will be less sustainable and less likely to provide fulfilling lives for the people of Wirral. There should be a more locally-focussed, Transition-based approach to social, economic and environmental development, associated with more local self-reliance, to build sustainable, cohesive, happy communities.</p>
1091	<p>The objectives of the "Golf Resort" could be achieved by the increased promotion of existing courses, as is already being done, with little threat to biodiversity. A new championship golf course in the Upper Birkett Valley, which has been retained despite previous representations, will have problems with biodiversity, flooding, Green Belt, loss of farmland and other issues. The summary of the Sustainable Community Strategy contains nothing about biodiversity and the summary of the Corporate Plan only vaguely mentions "environmental protection".</p>

## Detailed Comments

**4.4** The following more detailed comments were received on the Spatial Vision itself:

### General Comments on Points A to P

ID	Summary of Responses Received
22	Points A to P are excellent.
118	Points A to P are generally welcomed. Care must be taken to not promote inappropriate and poor development. It is not clear how the objective for Settlement Area 2 will be met as development at Wirral Waters will undermine the traditional town centre of Birkenhead. Wirral is poorly

	<p>managed and promoted as a tourist destination due to lack of investment in heritage, nature, wildlife, marine sports and coastal attractions. Large externally funded developments are not the answer and are more to do with what the investor wants rather than what Wirral needs. West Kirby and Hoylake are important but for informal tourism and sports rather than a Golf Resort and ill-located hotel on Dee Lane Car Park. Wirral Waters could include provision for major indoor sports not currently provided for in Wirral.</p>
218	<p>The Spatial Vision does not have an over-arching statement about town centres. It should aim to maintain, support and enhance the role of the Borough's existing town, district and local centres as a whole and not just those located in certain Settlement Areas, to promote sustainable communities with improved access to facilities and services for all, to secure social, economic and environmental benefits.</p>
232	<p>The Spatial Vision is clear and the key themes are adequate but some items appear to have been included as national or local 'hot topics' rather than for objective strategic importance. Sustainable consumption and production and the delivery of critical infrastructure are absent.</p> <p>There is no link between delivering new waste management infrastructure in the Vision and the spatial objectives, apart from climate change. It may be useful to include a reference the Waste DPD.</p>
273	<p>Agree with the amended Spatial Vision.</p>
301	<p>Agree with the amended Spatial Vision.</p>
383	<p>Agree with the amended Spatial Vision.</p>
459	<p>Generally welcome the Spatial Vision.</p>
472	<p>Agree with the amended Spatial Vision.</p>
518	<p>Agree with the amended Spatial Vision.</p>
548	<p>The Mersey Coastal Park proposals would support the Spatial Vision.</p>
668	<p>There is too much overlap between the Spatial Vision and the Spatial Objectives. The Vision should be a high-level forward look with the Objectives as lower-level activities for delivering against it. At present both are pitched at around the same level.</p>
704	<p>Broadly agree with the amended Spatial Vision.</p>
717	<p>Agree with the amended Spatial Vision.</p>
800	<p>Support the Spatial Vision.</p>
831	<p>Agree with most of the Spatial Vision.</p>

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892	There is no evidence of a sustainability appraisal having been carried out for the Spatial Vision.
915	Agree in very large measure with the vision for the future.
1060	<p>A suggested alternative Vision would not respond to the specific, geographic, spatial detail in the Spatial Options Report but would apply to the Borough as a whole at all spatial levels:</p> <p>The quality of life for the people of the Wirral will be excellent and fulfilling. Wirral will produce far less carbon and its people will live within limits presented by responsible environmental stewardship, declining oil supplies and climate change. By 2031 the Wirral will be a better place to live, learn, work, visit and invest, and where:</p> <ul style="list-style-type: none"> <li>• Our CO2 emissions are low in all sectors and areas of economic, social and domestic activity: business and industry, the public sector, domestic and housing, leisure and road transport;</li> <li>• We have robust energy security facilitated by an extensive network of local micro-generated renewable energy producers. The average community-owned renewable energy company produces at least half of local energy requirements to meet locally devised plans for community energy security;</li> <li>• The transport infrastructure has been radically transformed to reflect CO2 commitments and declining oil availability with public transport, bicycles and walking primary modes of transport;</li> <li>• There are jobs for all in a highly productive, well-skilled economy which comprises a resilient blend of international, national, regional and local companies, businesses and social enterprises and where the environmentally sustainable economic superstructure is knowledge based and there are well-established networks of locally resilient food, goods and services providers in the private, community and public sectors;</li> <li>• Wirral people of every age and from every community and minority are happy, with a strong sense of well-being, a positive view of the future and a sense of security in their own and their families' lives. This is engendered by high levels of physical and mental health, community cohesion, achievement of intellectual and skills potential, participation in civic life and enjoyment of arts, creative, cultural activities and sports;</li> <li>• A thriving, well-resourced voluntary and community sector is involved in services and activities that contribute to community security in all its dimensions and provides volunteering and paid opportunities for local people;</li> </ul>

- People have a good choice of high-quality, affordable and low-carbon homes in attractive green neighbourhoods in established communities with gardens or allotments in the immediate neighbourhood to grow food;
- Businesses and homes will be connected to high-quality digital communications to facilitate home-working and provide access to leisure, on-line learning/ training, social networking and participation in local civic life, including democratic processes;
- All homes will be within a short walk or bike ride of well integrated, sustainable public transport and schools/ local multi-use centres providing quality school education, life skills and training, arts, culture, healthy living and sports venues for people of all ages;
- Public facilities are set within, and are linked by, greenspace, including areas managed for wildlife. They are safely and readily accessible and a short distance from homes by foot and bicycle. Networked green and wildlife greenspace and water bodies/ wet areas reduce local temperatures in the warmest months of the year;
- Local distinctiveness is valued and expressed through food, produce, cultural activities and celebrations. It is sustained physically through careful attention to locally relevant built form, massing, detailing and materials that contribute to energy efficiency. Local ecological character is expressed through greenspace and water bodies where biodiversity has increased and is increasing;
- We carefully look after our natural and built environments and heritage artefacts in a rolling programme of enhancement and maintenance. The natural and built environments are integrated to provide rich and rewarding environmental experiences and contact with nature and its rhythms and cycles;
- The Wirral coastline, the sea and coastal settlements are managed and developed with new recognition of their particular local, regional and international roles. New marine spatial plans recognise Wirral's contribution to a more robust framework for the development of renewable energy generation programmes.

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## Comments on Point A

ID	Summary of Responses Received
151	The Spatial Vision refers to a higher quality of life for its residents and visitors" - "higher" than what? Than that offered in 2010 or higher than other Boroughs in 2031?
232	"...in harmony with its environmental capacity" could be added to make the environment a more integral part of the Spatial Vision.
892	Point A is supported but can only be delivered by the implementation of amended rural policies.

## Comments on Point B

ID	Summary of Responses Received
459	Support Point B.
502	Point B is supported by RSS Policies DP3, W1 and W2.
892	Point B is supported but the rural areas must also be allowed to contribute.

## Comments on Point C

ID	Summary of Responses Received
459	Support Point C.
502	Point C is supported by RSS Policies DP3, W1 and W2.
892	Point C should include Settlement Area 8.

## Comments on Point D

ID	Summary of Responses Received
459	The wording implies that this objective is only relevant to certain parts of the Borough and should be revised to say "...particularly in Settlement Areas 1, 2, 3".
504	Point D should not be seeking to reduce out-migration but to achieve a position of net in-migration to support economic growth. The Vision should explicitly seek to provide an employment and premises offer that can reduce net out-commuting.

## Comments on Point E

ID	Summary of Responses Received
459	Support Point E but the wording implies that this objective is only relevant to certain parts of the Borough and should be revised to say "...particularly in Settlement Areas 1, 2, 3, 4 and 5".
502	A Borough wide target should be considered as it seems a bit specific to say that only Settlement Areas 1 to 5 will improve.
892	Support Point E but the rural areas must also be allowed to contribute.

## Comments on Point F

ID	Summary of Responses Received
459	Support Point F but the wording implies that this objective is only relevant to certain parts of the Borough and should be revised to say "...particularly in Settlement Areas 1, 2 and 3".
544	Support the provision of high quality, well designed, mixed tenure housing in line with RSS Policies L2, L3 and L4.
892	Point F should provide a wider focus for new development.

## Comments on Point G

ID	Summary of Responses Received
459	Point G implies that this objective is only relevant to certain parts of the Borough, provides no policy towards vacant and derelict land outside Settlement Areas 1, 2, 3 and 4 and should be revised to say "...particularly in the older urban areas of Settlement Areas 1, 2, 3 and 4".
544	Support the reduction of the amount of vacant and derelict land in line with RSS Policy DP4 and L4.

## Comments on Point H

ID	Summary of Responses Received
187	Focusing 'culture' in Settlement Area 2 is impractical and undesirable. Wirral culture is far more widely dispersed. Culture, especially as a participatory activity, should be firmly linked to each of the various Settlement Areas, drawing on and enhancing their individual characters (and reducing travel).

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	The loss of existing halls (unless they are taken over by community groups) and their absence of provision in renewal areas risks replicating the soulless development of the 1960's.
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## Comments on Point I

ID	Summary of Responses Received
459	Point I would be consistent with the decision to designate Birkenhead Docks as a Strategic Regional Site in July 2009. Wirral Waters is one of a number of specific projects of strategic importance agreed as part of the Atlantic Gateway.

## Comments on Point J

ID	Summary of Responses Received
187	Areas attractive to tourism tend to offer character and distinctiveness in addition to the natural environment and built heritage and provision for the maintenance and support of such characteristics should be included.
459	Support Point J.
502	Point J fits with RSS Policies W6 / W7.
548	Point J should include the Mersey Coastal Park.
831	Support Point J.
909	Support Point J but a more prominent reference to the quality of the environment should appear earlier on within the Vision. An overarching introductory sentence could be included to place environmental concerns alongside social and economic ones. At present, the emphasis is strongly socio-economic (Points A to I). Point J only refers to environmental quality in the context of developing the local tourism industry. A more balanced approach is needed.
932	The word 'tourism' is misleading and should be replaced by 'day visitors'. There is no evidence that West Kirby needs 'regeneration' beyond a few, minor environmental improvements. The Golf Resort is an economic investment-led proposal that has nothing to do with quality of life for local residents or the natural environment.



## Comments on Point K

ID	Summary of Responses Received
892	Point K assumes that there is no disparity in outcomes in Settlement Area 8 or suggests that the Council does not intend to tackle them.
909	Support Point K but more prominent reference to the quality of the environment should appear earlier on within the Vision.

## Comments on Point L

ID	Summary of Responses Received
118	The rest of the plan does not reflect this and needs to be rethought and strengthened if Point L is to be achieved.
320	Welcome the commitment to Government targets which should be taken further to match all Government sustainable development targets leading up to 2016 and set reduction targets for non-domestic developments.
795	Support the emphasis placed on climate change which means a transition from a system that relies heavily on unabated fossil fuels, to a radically different system that includes a more diverse energy mix, with a significant contribution from renewable energy, less vulnerable to fluctuations in the availability or price of any one fuel. "...an appropriate scale for Wirral..." should be clarified so that it does not become a constraint on tackling climate change and energy security.
892	Support Point L but all new residential development should be zero carbon from the adoption of the LDF onwards. The absence of this will raise serious questions about the sustainability of the large number of homes to be developed within the Mersey Heartlands Growth Point prior to 2017.
909	Support Point L but more prominent reference to the quality of the environment should appear earlier on within the Vision.
932	Point L makes it seem that only new development will be affected by climate change and flood risk. Action should be taken to protect all development from these hazards.
1107	Climate change is too low within the Spatial Vision. The emerging RS2010 identifies a low carbon economy and addressing climate change as overarching issues. Peak oil and climate change need to be at the top of the Vision as a principal foundation with an appropriate follow-through into policies and action.

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## Comments on Point M

ID	Summary of Responses Received
118	Point M is welcomed but is not reflected by the proposal to breach the Green Belt with a Golf Resort in the Birkett Valley. The Green Belt and the need for sustainable local agriculture and food production should be included.
174	Point M should begin with: "The Borough will respect and promote the retention of the present Green Belt. It will have maintained and enhanced ..."
187	Point M only deals with distinctiveness in the context of the control of new development.
232	Support Point M which could have been made a more integral part of the Spatial Vision. Green Infrastructure is not yet supported by the preceding evidence.
301	Point M is welcomed, so that local heritage and distinctiveness will be highly valued and supported by local controls over the design and character of new development.
410	Point M should say "will be continually maintaining and enhancing" rather than "will have maintained and enhanced".
438	Point M is broadly agreed but should include recognition of the contribution of agriculture to the Borough's green infrastructure and to the maintenance of food security.
800	Point M should be amended to include specific reference to enhancing and safeguarding resources for sport and recreation.
831	Support Point M. Biodiversity has inadequate mention in other sections of the Spatial Options Report.
892	Point M can only be delivered by the implementation of amended rural policies.
909	Support Point M but more prominent reference to the quality of the environment should appear earlier on in the Vision.
963	The high value given to local distinctiveness and heritage is supported but successful management of the historic environment entails much more than local controls over the design of new development. The vision for the future management of the historic environment is unclear. For example, how are heritage assets at risk to be tackled and how are un-designated assets to be handled?

## Comments on Point N

ID	Summary of Responses Received
232	Point N provides a useful link to the Merseyside Waste DPD.
892	Support Point N, particularly with regard to the potential for anaerobic digestion plants within the rural areas.
976	Point N should be amended by replacing the word "re-processed" with "recovered", to better reflect the terminology used within the waste hierarchy.

## Comments on Point O

ID	Summary of Responses Received
831	Point O does not mention reducing the need to travel, which is at least as important as trying to change the mode of transport, to reduce carbon emissions.
1109	Point O stands in contradiction to Point C. The recurrent reference to promoting more sustainable patterns of journeys to work is not reflected in the Vision or its delivery.

## Comments on Point P

ID	Summary of Responses Received
118	Point P fails to reflect the need to guard against anti-social behaviour in the management of land uses and the management of the public realm.
232	It is not clear why Public Safety is a headline theme or why its longer definition focuses primarily on air quality to the exclusion of other issues.

## Other Responses to Consultation Question 2

4.5 Other comments on the Spatial Vision were mainly directed towards:

- the need for a shorter, more succinct statement
- the need for development and investment over a wider area of the Borough
- the extent of reliance on Wirral Waters
- the lack of reference to cultural provision
- greater recognition for farming, west Wirral and Settlement Area 8
- the need to respond to reducing funds for transport improvements
- the need to refer to infrastructure provision

4.6 A summary of each of the comments received is set out in the table below:

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ID	Summary of Responses Received
21	In general, an excellent piece of work.
45	Balanced growth of all residential areas is best for Wirral. Support retaining the Green Belt between the various districts and villages but some encroachment may be necessary or desirable and each case should be considered on its merits. Support the principle that major new employment should be created along the Mersey, where possible. Incentives should be available for land reclamation and new housing in the focus area but this should not prevent the sensible residential development of vacant land and the redevelopment of outdated or poorly built residential areas/properties in other urban areas. Policy should take into account the quality of the buildings to be replaced and the sustainability of the location. Not gradually renewing the housing stock will leave a very outdated, poorly insulated and gradually declining residential environment.
54	Balanced Growth. Populate or perish. Businesses, Councils, schools and shops all need people. People need employment. The easiest way to achieve this is to expand the housing stock required by the people you wish to attract. Young upwardly mobile people do not want to live in Council flats but in small clusters or single occupancy dwellings, of which Wirral has an abundance of suitable sites, using existing roads etc. by dividing large blocks up. Everyone wins.
69	Agree with Spatial Vision in principle but parts of Settlement Area 1, such as Liscard Town Centre, are also in need of revitalisation. King Street and Brighton Street (A554) have had no investment for too long. The regeneration of this area would benefit the tourism potential of New Brighton. In recent years, every small pocket of vacant land in New Brighton has either been built on or received planning permission for housing. Controls are needed to prevent over-development. Welcome high quality maintenance of urban green spaces and controls over the design and character of new development, of great importance within tourist areas not just in Conservation Areas. The Council should do more to educate people about what should be put in recycling bins, to reduce the amount going to landfill.
164	Jobs, people, and money are missing. The Report does not say how jobs will be created nor what form these jobs will take. Everything appears to rely on the success of the Wirral Waters but without any detail. If, economic output is the lowest in England, it is vital to engage all of the community in job-creation. The Council should set up groups throughout the electorate to identify new job opportunities that will not just be a gateway for Chinese goods. Local banks or funding institutions must fund new local businesses rather than shy away from funding technological innovations. A cultural change is needed. There are universities on our doorstep which would be willing to collaborate.

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187	Improving the appearance of the industrial areas to the east of the A41 would provide a more inviting entrance to Wirral. Tree planting would be an easy and inexpensive way of shielding existing development and should be required in future planning approvals. It is unclear how culture and community activities will be covered or the mechanism by which youth activities will be provided.
250	The Spatial Vision should promote quality residential development in areas identified as making a significant economic contribution in Settlement Areas 4, 5, 6 and 7. The link between where people live and where they work is obvious. Wirral should be attracting entrepreneurs, investors and top managers.
342	It is not clear how many local people have gained well-paid long term jobs from all the previous regeneration programmes from the 1970's onwards. The Council has engaged communities to get funding to keep Council staff in employment. There is a need for direct funding to community partnerships, with partners delivering tailored programmes for each area.
348	Agree with the Spatial Vision but would welcome more active support for farming to maintain the rural character of places like Frankby in Settlement Area 8. Without active farming, west Wirral and much of Settlement Area 8 would lose the very business that creates and sustains the natural landscape.
399	On the whole, a fair indication of what you hope to achieve. It would be wiser to improve certain facilities rather than demolish.
403	Wirral should not stop pursuing regeneration because it appears too difficult. Even small improvements can have a significant impact. The achievement of many of these ideas may however be stifled by a lack of funding.
408	There should be a greater emphasis on promoting equal, more inclusive and safer societies for disabled people and their carers.
410	Support the key regeneration projects set out and the significant benefits that Wirral Waters could bring to the Liverpool City Region. The Spatial Vision gives a good range of priorities but is probably too long. It is unlikely that all these improvements will be completed by 2031.
420	The Core Strategy should reflect the boundaries and objectives defined for the Outer Area by the Regional Spatial Strategy, which are not consistent with the boundaries to Settlement Area 4. Changes to the Green Belt boundary should be considered as a local change to reflect the boundaries of the Outer Area, as set out in the 4NW Green Belt Guidance Note (May 2009). The SHLAA may mean that the Council will need to consider sustainable greenfield sites in the Green Belt. The Spatial Vision should primarily focus development into the regeneration priority area in Settlement

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	Area 2 but also allow for urban extensions in sustainable locations in a newly defined Settlement Area 4. The Spatial Vision should acknowledge the need for urban expansion at the edge of Eastham.
483	The Spatial Vision has not addressed the Borough-wide matter of community and cultural facilities.
568	There is little to no consideration of how the issues facing the west of the Borough will be addressed.
627	A key diagram should be developed for the next stage of the Core Strategy.
640	Agree with the Spatial Vision but it is not clear how it will be delivered.
656	Generally support the Spatial Vision but priority should be given to securing the potential benefits from more widely based investment across the Borough.
755	The Council seems intent on closing public facilities and disposing of assets such as leisure centres, public halls and libraries. Wirral has a beautiful coastline, lovely buildings, museums and art galleries, full of amazing treasures, yet so little seems to be made of them. The countryside has an abundance of pretty little villages so why is tourism so little promoted? There is a need to think outside the stereotype of build, build, build, ask what we have to offer on Wirral and work on that.
798	<p>A simple "one line summary" is needed to easily assimilate and market the Spatial Vision. The Vision ignores some basic issues including:</p> <ol style="list-style-type: none"> <li>1. Wirral is a peninsular and is "missing" the catchment area associated with an inland Council.</li> <li>2. Train and bus make Liverpool the natural working and shopping destination for most people.</li> <li>3. Wirral is a "dormitory" for Liverpool. Greater economic independence is a valid ideal but failing to accept and work with established reality does not make a valid strategy.</li> <li>4. Some 45% of the Wirral is Green Belt, farmland or green space. The strategy fails to consider how this land may be used.</li> <li>5. The only mention of the Green Belt is the inappropriate "Golf Resort" in Hoylake, which would result in the loss of Green Belt and agricultural land.</li> <li>6. The promotion of local food production is a major oversight, which can be combined with healthy outdoor activities.</li> </ol>

	<p>7. The "Warrens" Nurseries should have been made available for much needed allotments or to grow flowers for the displays in Hoylake, to prevent lorries driving all the way from Holland.</p> <p>8. Wirral has a declining, ageing population. What is the strategy for caring for the ageing population?</p> <p>9. The Council will be putting all its hopes in Wirral Waters. There is no "Plan B".</p> <p>10. Dependence on Wirral Waters gives too much power to Peel Holdings.</p>
856	<p>Agree with the Spatial Vision but Settlement Area 8 is not specifically identified, which has much to offer in improving the housing offer in areas where people want to live. Not all housing need will be met by large scale provision in the east of the Borough. Reference should also be made to the need for infrastructure and services, such as health provision, which will need the capacity to meet demands arising from large scale housing provision such as at Wirral Waters.</p>
881	<p>The strategic direction should integrate land use and transport, regeneration and economic development, social inclusion and the need to tackle climate change and air pollution. Traffic volumes and distances travelled are forecast to grow over the next 15 years (on a 'do nothing' scenario), which need to be addressed by a strategy to reduce the distance between work and employment / leisure. Funding for accessibility and transport improvements will reduce from April 2011. Development should be focused on areas well-served by existing, sustainable transport and the need to minimise travel, to allow walking and cycling to become more prominent. Developers should be expected to contribute to the cost of public transport access in areas not well served by existing public transport services.</p>
970	<p>The strategy needs to be summed up in a 'one liner', which is easy to define and market.</p>
988	<p>Do not agree with the Spatial Vision. There is too much emphasis on Settlement Areas 1 and 2. A far more balanced approach is needed. Do not agree that: Settlement Area 1 and Settlement Area 2 will provide greater residential opportunity; that these Areas will be regarded as increasingly attractive places to live; that Settlement Area 2 should become a sub-regional retail destination and centre of choice for all Wirral residents and should be transformed in the manner expressed. These ambitions are pure fantasy. The property investment market (office, residential and retail) will not deliver in these locations and public subsidy will not be available to support such wild dreams.</p>

1015	There is no reference to liaison with infrastructure suppliers and utility companies.
1022	Generally support the Spatial Vision. The role of Croft Retail and Leisure Park should be recognised as an important provider of employment, retail, leisure and service facilities to local residents and Wirral International Business Park, with an established infrastructure and transport system.

**4.7** The Council has responded to these comments by including additional information within the revised Core Strategy Spatial Portrait and by amending the Spatial Vision in the Preferred Options Report<sup>(8)</sup>.

## 5 Spatial Objectives

**5.1** The following sections set out the comments submitted in response to Consultation Question 3 - *Do you agree that these are the most appropriate Spatial Objectives for the Core Strategy to pursue? Is the wording correct or are any further changes needed? Are there any other Spatial Objectives that should be included? Please refer to the number of the Spatial Objectives in your reply and give the reasons for your answer.*

### Detailed Comments

**5.2** The following more detailed comments were received on each of the eleven Spatial Objectives:

#### Spatial Objective 1 - Economic Revitalisation

**5.3** Comments on Spatial Objective 1 were mainly directed towards:

- the need for jobs
- the need for the Objective to apply across a wider area of the Borough
- the need to integrate with a wider package of local improvements
- clarification of statistics
- comments on individual projects
- the need to promote a low carbon economy

**5.4** A summary of each of the comments received is set out in the table below:

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8 Preferred Option 3 - Spatial Vision refers



ID	Summary of Responses Received
119	Economic revitalisation, like the Golf Resort and Sail Hotel in West Wirral, should not be pursued to the detriment of the needs and values of local communities or the existing quality of Wirral. Wirral Waters needs careful management to protect against adverse impacts on other centres, like Birkenhead. Real jobs and industry are needed more than retail centres.
152	Paragraph 4.9 - the relationship between square metres, hectares and VAT registrations and the need to provide additional floorspace to reduce spending is confusing.
233	Consideration of existing biodiversity value could be built in to the Objective or the Spatial Vision could be amended to make this clearer.
252	Economic revitalisation must be linked to a wider package of business premises, schools, leisure facilities, infrastructure and an attractive place to live. The home is probably the most important factor. Surrounding areas like Denbighshire, Flintshire and Chester have attracted middle and high income families, which should have been living in Wirral, by building good quality detached properties.
343	Paragraph 4.6 is supported. There is still very poor performance in getting people back into long term jobs.
460	Support the Objective but the text only relates to Settlement Areas 1 to 5, whereas paragraph 4.10 says it should apply across the Borough 'with a special emphasis' on the Assisted Areas and Strategic Regional Sites. It should be clearer that the Strategic Regional Sites are in Settlement Areas 2 and 4.
473	There is a tremendous need for jobs which should have top priority.
503	Para. 4.6 - Tackle the problems of lack of income and employment in areas of most need. Poor housing must be addressed if a sense of purpose and belonging is to be achieved.
505	Support the Objective in line with RSS Policies RDF1, W1, W2 & W3. The relationship between the 302 ha in paragraph 4.9 and the 125 ha of existing land identified in the Employment Land Study should be clarified.
540	This Objective should reflect the aspiration to become the biggest low carbon goods City-Region economy in the UK in the Liverpool City Region Multi Area Agreement, linked to the objectives of the Mersey Tidal Power Project, which include maximising the social and economic benefits from the development.
549	The Mersey Coastal Park proposals will support the delivery of this Objective.
669	A brief explanation of 'Assisted Areas' is needed.

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893	The Objective should be amended to include Settlement Area 8.
900	Merseytravel's Merseylearn initiative supports the skills development of 33,000 transport sector workers across Merseyside, to support a stronger visitor experience and economic regeneration, as a catalyst to up-skill the workforce in line with the Leitch Report.
989	The ambition for a high quality employment area in Birkenhead Docks is unrealistic. Support should be provided for the diversification, growth, expansion and replacement of existing employment sites across the Borough.
1023	Support the Objective although it should be recognised that sites outside Assisted Areas and Strategic Regional Sites such as the Croft Retail and Leisure Park also have the potential to revitalise, diversify and expand the Borough's economy.

## Spatial Objective 2 - Vacant Urban Land

**5.5** Comments on Spatial Objective 2 were mainly directed towards:

- the need to apply the Objective across the Borough as a whole
- the importance of some vacant sites for biodiversity and green infrastructure
- the need to promote the re-use of existing buildings to protect local heritage

**5.6** A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
119	Support the Objective.
233	Spatial Objective 2 may also aid the Council in fulfilling its duties under Part IIa of the Environmental Protection Act. Some brownfield sites contribute to biodiversity and the appropriateness of re-use would need to be verified on a site by site basis. Consideration of biodiversity value could be built in to the Objective or the Spatial Vision could be amended to make this clear.
343	Support the Objective.
460	Support the Objective, which should not only apply to Settlement Areas 1 to 4. It is unclear why it refers to vacant and under-used 'land' in Settlement Areas 2 and 4; but vacant and under-used 'sites' in Settlement Areas 1 and 3.
473	Support the Objective.
503	The use of vacant and underused land within the older urban areas should be encouraged. Economic revitalisation and housing market would follow. Welcome a target of 80% of new housing development on previously developed land.

506	Support the Objective in line with RSS Policies DP4 and L4.
549	The Mersey Coastal Park proposals will support the delivery of Spatial Objective 2.
595	Very little under-used and vacant land in New Brighton has not already been designated for housing, apart from the former Grand Hotel on Marine Promenade. In a built up area vacant land could acquire value as green infrastructure.
749	There are numerous areas of non-Green Belt land that could be used for infill development, many of which are in poor condition, which it would be an advantage to build upon to improve amenity and generate revenue from planning fees, Council Tax etc. The re-use of derelict and decaying properties in west Wirral is currently prevented by the moratorium.
760	The need to develop the many brownfield sites needs more emphasis.
766	Brownfield sites must be the first to be developed for housing or for industry.
832	Support the Objective but Picture 4.2 is too small for sense. Object to the appearance of several key wildlife sites, where the capacity for development must be regarded as small. NLUD records should be compared with the results of the Wirral Biodiversity Audit and protected sites removed.
893	Spatial Objective 2 should only refer to reducing the proportion of vacant and underused land in Settlement Area 2 and Settlement Area 4.
910	Support the Objective but the supporting text should recognise that brownfield land can often harbour valuable biodiversity assets which should be conserved or replaced.
989	Vacant and underused sites should be targeted across the Borough. Sites in Settlement Area 1 and Settlement Area 2 should be considered for public amenity uses, funded by public subsidy and CIL.
1024	Support the Objective.
1104	Spatial Objective 2 should also recognise the need to keep existing buildings in beneficial use and to find new uses for buildings which contribute to Wirral's local heritage, to respond to local concern about the loss of locally important buildings.

## Spatial Objective 3 - Housing Market Renewal

**5.7** Comments on Spatial Objective 3 were mainly directed towards the need to also set clear objectives for housing development in areas outside the Newheartlands Pathfinder.

**5.8** A summary of each of the comments received is set out in the table below:

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ID	Summary of Responses Received
119	Support the Objective.
252	Renewal and growth in Settlement Areas 1, 2 and 3 to the exclusion of all other areas will not revitalise the economy and bring in jobs. The success of Deeside Industrial Park is associated with good quality residential development nearby.
343	Support the Objective as a major priority.
412	Clarification is needed on the relationship with the Mersey Heartlands Growth Point.
460	Support the Objective but the Core Strategy also needs to set out clear objectives for housing development in the rest of the Borough.
545	Support the Objective in line RSS Policies RDF1, L3, L4, LCR1 and LCR2.
989	Support the Objective in Settlement Areas 1, 2 and 3 but this should not be at the expense of limited growth elsewhere in remaining areas.

## Spatial Objective 4 - Housing Growth

**5.9** Comments on Spatial Objective 4 were mainly directed towards:

- the potential transport benefits of integrated growth
- the reliance on a small number of major projects
- the need to provide the right type of accommodation
- the need to distribute growth over a wider area of the Borough

**5.10** A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
119	Support the Objective.
252	Renewal and growth in Settlement Areas 1, 2 and 3 to the exclusion of all other areas will not revitalise the economy and bring in jobs. The success of Deeside Industrial Park is associated with good quality residential development nearby.
343	Support the Objective as it makes economic sense.
412	Clarification is needed on how the Mersey Heartlands Growth Point will be delivered and its relationship with the Housing Market Renewal Pathfinder. A clearer recognition of the importance of sub-regional working on housing land and housing markets would be beneficial.

421	Spatial Objective 4 should better reflect a sequential approach to the location of development. The first priority should be the Mersey Heartlands Growth Point (Settlement Area 2); the second priority, the surrounding urban areas of Settlement Areas 3 and 4 including extensions Settlement Area 4; the third priority should be Settlement Area 8, consistent with the Inner, Outer and Rural Areas defined in RSS. Housing growth should ensure the best use of existing transport infrastructure and capacity, with, for example, housing located within a 10 minute walking distance of public transport nodes such as the A41 or the Wirral line of the Merseyrail network.
460	Support the Objective but the Core Strategy also needs to set out clear objectives for housing development in the rest of the Borough.
569	Agree that Settlement Areas 1, 2 and 3 are priority locations but the Council must consider whether the majority of growth should be placed here. Delivery is fundamental. Onus is being placed on a small number of major projects, which were questionable even in prosperous times. The Council should consider a more balanced and sustainable approach to housing growth.
751	Despite an ageing population and limited employment opportunities there is still a shortage of suitable living accommodation and there are still a large number of vacant properties. The right sort of accommodation needs to be built.
889	The Growth Point will present an opportunity to strengthen strategically planned growth linking employment to housing, avoiding areas of high environmental impact and to secure investment in transport infrastructure to improve accessibility. Health, education, shops, community facilities etc., will be of equal importance to the delivery of sustainable communities and minimising the need for long distance commuting. Land with transport potential must not be released for housing.
893	Spatial Objective 4 should distribute housing growth between Settlement Areas 1, 2, 3, 4, 5 and 8.
989	Growth should be directed to other areas besides Settlement Areas 1, 2 and 3.
1119	Support the Objective in line with RSS paragraph 7.18(f) which supports the provision of new housing development in the eastern part of Wirral (east of the M53), to support the inner areas as a priority for economic growth and regeneration.

## Spatial Objective 5 - Social Inclusion

**5.11** Comments on Spatial Objective 5 were mainly directed towards the need to support social inclusion through a wider series of initiatives.

**5.12** A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
119	Support the Objective.
252	Support the Objective but wealth must be generated by new business and not grants to return local pride.
343	It is not clear how many local people from these areas have been helped by previous regeneration.
439	Carr Lane in Hoylake also has a high level of deprivation but is not shown on Picture 4.5.
460	It is not clear how the Core Strategy will help deprived areas in the west of the Borough. Spatial Objective 5 would be more compatible with Broad Spatial Option 2 which would adopt a more flexible approach towards development in other sustainable locations within the urban area.
488	This is the only Objective that comes close to dealing with community facilities but only refers to people living in the most deprived areas.
549	The Mersey Coastal Park proposals will support the delivery of Spatial Objective 5.
801	The Objective should be amended to refer to improved access to facilities for sport and recreation.
893	Support the Objective but this will require the implementation of Policy Option EL3.
989	Support the Objective but this will only be achieved through a sensible and deliverable strategy for growth.

## Spatial Objective 6 - Transport Accessibility

**5.13** Comments on Spatial Objective 6 were mainly directed towards:

- the need for a transport-oriented approach to new development
- the need to make public transport more attractive
- the need to make best use of existing transport infrastructure
- the potential of the Bidston-Wrexham railway line
- problems on east-west routes and the A41
- the need for additional parking at railway stations
- the need for developer contributions

**5.14** A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
70	Electrification to Wrexham is important. Investment should be obtained as soon as possible to renew the motorway bridge at Junction 1, as one of the main routes into New Brighton.
119	Support the Objective. The key issue is to make public transport more attractive, which could include improvements to the Wrexham line. A fixed link is necessary to Wirral Waters as current rail routes are not close enough to serve it, without generating additional road traffic.
349	Would like to see a greater emphasis on the impact of travel choices on environmental conditions, with a greater encouragement of rail travel and the use of larger/wider 'A' roads to reduce pressure on overburdened 'B' roads.
421	Spatial Objective 6 should better reflect a sequential approach to the location of development. The first priority should be the Mersey Heartlands Growth Point (Settlement Area 2); the second priority, the surrounding urban areas of Settlement Areas 3 and 4 including extensions Settlement Area 4; the third priority should be Settlement Area 8, consistent with the Inner, Outer and Rural Areas defined in RSS. Growth should ensure the best use of existing transport infrastructure and capacity, with, for example, development located within a 10 minute walking distance of public transport nodes such as the A41 or the Wirral line of the Merseyrail network.
460	It is not clear how this Objective would be supported by restraining development in easily accessible locations in the west. Spatial Objective 6 would be more compatible with Broad Spatial Option 2 which would adopt a more flexible approach towards development in other sustainable locations within the urban area.
473	This is the wrong way round. Transport should be provided to the less easily accessible locations. People would be happier to live in those areas if there were homes, jobs and services provided.
549	The Mersey Coastal Park proposals will fully support Spatial Objective 6.
558	Sustainable transport links and improved accessibility to existing destinations is in line with RSS Policies RT1, RT2 and RT3. Attention should also be made to walking and cycling in line with RT9. There is a need to ensure the best use of existing infrastructure as well as manage travel demands, reduce the need to travel and increase accessibility in line with RSS Policy DP4. Delivery needs to take likely budget cuts into account, with an emphasis on a package of small scheme measures to address climate change, travel by private car and improved accessibility. Any proposed transport scheme must now meet the five DaSTS goals of: reducing carbon emissions; supporting economic growth; promoting equality of opportunity; contributing to better safety, security and health; and improving quality of life and a healthy natural

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	environment. The need for travel plans should be included for all new developments and existing major sites, to ensure that a range of sustainable transport alternatives are provided and monitored to help with the delivery of future schemes.
833	Promoting the A5137 is unwise, as its winding nature already creates rush-hour problems. An environmentally damaging relief road was suggested but would merely shift the problems back towards Heswall. Reducing the need to travel is more important.
843	Rail development opportunities are omitted. The Wrexham-Bidston line would better serve mid and west Wirral with a 30 minute service. Park and ride could be provided at Bidston and electrification could link with the Merseyrail service direct to Liverpool. Access to existing railway stations by disabled users needs to be given more importance.
880	The Core Strategy should be fully integrated with the Local Transport Plan. A strategic transport model will allow the testing of policies and interventions, including spatial options. Accession software can be used to assess the relative accessibility of sites and premises.
882	The Core Strategy should implement the Merseyside Transport SPD to ensure a consistent approach across Merseyside. Formal consultation should take place on development around all medium and major transport nodes and interchanges.
884	Rail capacity on the Chester line will be very constrained until 2024, following the reduction from 4 tracks to 2. The Merseyside Route Utilisation Strategy and Merseyside Rail Strategy identify potential for increased frequency of service between Liverpool and Chester and new stations at Woodchurch and Deeside Industrial Park on the Borderlands Line combined with possible electrification or an enhanced diesel service. Wirral Waters will require major infrastructure improvements. A new station for long distance rail services on the disused alignment from Rock Ferry to Birkenhead Docks and a new cross-river rail tunnel would incur substantial costs. The disused Bidston Curve rail alignment and the Birkenhead Docks Link from Birkenhead North Depot to Duke Street and from Rock Ferry to Canning Street should be safeguarded for future rail purposes. The Wirral Way alignment should be safeguarded with Cheshire West and Chester Council for future public transport, walking and cycling. Developers will need to contribute to additional capacity improvements along key corridors.
885	Bus network routes and capacity are more flexible than rail but each extra vehicle in the network costs around £100,000 plus per year, with every mile of operation costing about £3.50. The cost of accommodating changes to the bus network should be mitigated by locating developments close to existing routes and controlling design to make it easy to route bus services



	directly through development. Reference should be made to existing best practice and Guidelines for Planning for Public Transport in Developments (IHT, 1999).
886	The cumulative impact of both Liverpool and Wirral Waters will be significant. Improved bus/rail interchange and enhanced park & ride should be investigated at rail stations in the vicinity of the Wirral Waters development. A segregated alignment for public transport (bus/bus rapid transit/tram) from the Woodside Pier should be safeguarded subject to further discussions. Car parking should be "the minimum number of parking spaces required to meet the needs of residents and visitors to Wirral Waters". Transport improvements will need to be funded by the developer.
887	There is unlikely to be a business case for a ferry, fast ferry or hovercraft service along the river to Liverpool John Lennon Airport. Mersey Ferries will continue to examine the potential for additional landing stages along the river, subject to business case, feasibility and availability of funding.
893	Spatial Objective 6 should include the M53 Motorway.
910	Spatial Objective 6 should include access to leisure and recreation opportunities as well as homes, jobs and services.
917	<p>Not enough attention is paid to congestion and loss of amenity resulting from commuting and commuter parking. None of the stations along the Merseyrail line to Chester and Ellesmere Port have sufficient parking facilities, causing massive parking problems in side roads close to railway stations. Most station car parks 'overspill' into adjacent areas by 8:00am on weekdays, leaving no space for residents, visitors, delivery and refuse collection vehicles to park or manoeuvre for the rest of the day until after 6:00pm.</p> <p>Links to the facilities at Croft in Bromborough are inadequate. There is no plan to improve this despite proposals for further development. The A41 has limited capacity because of residential property. A new industrial route is needed to link the M53 to the proposed industrial/retail facilities. A new east-west route is also needed. Spital Road is inadequate for the amount of traffic it takes and cannot be upgraded to an 'A' road due to existing housing development.</p>
989	Support the Objective but any investment must be linked to sustainable growth and development initiatives.

## Spatial Objective 7 - Local Distinctiveness

**5.15** Comments on Spatial Objective 7 were mainly directed towards the omission of Settlement Area 8 and the treatment of heritage issues.

**5.16** A summary of each of the comments received is set out in the table below:

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ID	Summary of Responses Received
119	Support the Objective which is supported by restrictions on development in west Wirral and needs to be applied to Bidston Observatory. Heritage is being neglected and lost in parks. The Objective should also apply to rural areas.
143	Support the Objective. Much damage has already been done. A towns need to be modernised to be attractive but we do not want ugly out of scale buildings like in the 1960's and 1970's.
189	Support the Objective, particularly the reference to Victorian and Edwardian buildings. The loss of the setting of large gardens should be added. Settlement Area 8 should be added. The Objective should apply to existing as well as new development as even one-for-one replacement and over-developed extensions can harm distinctiveness.
252	The attraction of higher quality residential areas is accepted but the development of quality homes has been stifled.
302	Support the Objective and strongly endorses the supporting commentary in paragraph 4.36. Welcome the commitment to prepare a separate Heritage DPD.
549	The Mersey Coastal Park proposals will support the delivery of Spatial Objective 7.
596	Support the Objective.
670	The Heritage DPD is not included in the Local Development Scheme. These details are more appropriate for Supplementary Planning Documents.
675	Support the Objective. Planning applications must be carefully scrutinised and Council Officers fully briefed.
752	Most new development is gimmicky, with timber lagging such as the new college in Birkenhead, which requires constant maintenance or quickly becomes very shabby. The development at Green Lane station is poor. Development needs to be child friendly with a garden and play facilities.
866	Support the Objective but Settlement Area 8 is missing which is important for Eastham Village.
893	Spatial Objective 7 should include Settlement Area 8.
910	Support the Objective.

966	Support the Objective and the preparation of a Heritage DPD but needs to acknowledge the links between the historic environment and economic and social well-being and the positive action required to secure the historic environment for future generations.
1113	Spatial Objective 7 is just as relevant to Settlement Area 8.
1114	The approach to heritage issues needs to be clearly stated in the Core Strategy not in a separate DPD.

## Spatial Objective 8 - Green Infrastructure

**5.17** Comments on Spatial Objective 8 were mainly directed towards:

- the need to apply the Spatial Objective over a wider area
- the need to recognise the wider function of green infrastructure
- the need to assess indoor sports facilities and update the Borough's assessment of playing fields

**5.18** A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
119	This section should also apply to farmland and Green Belt, which require renewal and development in agriculture, wildlife, access and recreation. Parks and open spaces have declined. Allotments are neglected.
189	Picture 4.7 omits the continuation of the Wirral Way to the south east of Davenport Road.
233	NI 197 (Local sites in active conservation management), monitoring information on SSSIs and biodiversity targets could be used to monitor progress.
239	Agree that Spatial Objective 8 should be monitored against accessibility. The Access To Woodland Standard should be used. The wording should be amended to say "To secure that everyone has good access to high quality green infrastructure near to their homes to meet local needs for open space, sport, recreation, leisure, biodiversity, amenity and mental and physical health".
252	Built up areas should be kept separate and not be joined up by the use of greenfield sites for housing or industry.
258	Support the Objective but the wording does not reflect the multi-functional role of green infrastructure in adapting to climate change and supporting a wide range of social, environmental and economic objectives.
302	Support the Objective.

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343	Support the Objective.
549	The Mersey Coastal Park proposals will support the delivery of Spatial Objective 8.
590	Support the Objective.
597	Support the Objective.
658	The Objective should not just secure an equitable distribution but also its satisfactory maintenance and management.
675	Needs to consider the provision and security of allotments.
775	Existing open space, sports and recreational buildings and land should not be built on unless an assessment has been undertaken which has shown the land or buildings to be surplus to requirements or replacement open space, sport or recreational facilities are provided. Development of playing fields will be opposed in the absence of a robust assessment unless specific expectations are met. The requirement for replacement provision should be set out.
793	The latest assessment of open space only seems to assess the existing level of provision. Future requirements will also need to be assessed. Indoor sport is not included within the assessment. The minimum range of facilities that should be assessed includes swimming pools, sports halls, leisure centres, indoor bowls centres, indoor tennis centres, ice rinks, community centres in urban areas and village halls in rural areas.
794	Any assessment of supply and demand for playing pitches should follow "Towards a Level Playing Field - A guide to the Production of Playing Pitch Strategies". The Council's playing pitch assessment and strategy needs to be up-dated. A bi-annual review of demand is recommended. The Ward based analysis in the latest open space assessment does not align with the more robust catchment area approach used in the Council's Playing Pitch Assessment. The standard in the open space assessment is meaningless in the absence of an up-to-date Playing Pitch Assessment and Strategy.
801	The Objective should be amended to include a reference to accessible green infrastructure along the lines of '...To secure an equitable distribution of high quality and accessible green infrastructure... .'
834	Support the Objective but it sounds as if biodiversity can be allowed to decay in the west as long as efforts are made to create more in the east. Biodiversity will be concentrated in certain areas dictated by geology, soils, geography, climate, history and management. A key role should be to provide the corridors, networks and stepping stones to allow species to move as the climate changes, as identified in the Wirral Biodiversity Audit. Paragraph 4.40 does not refer to nationally and internationally important biodiversity

910	Support the Objective.
934	The proposed Golf Resort would appear contrary to this Objective, as it will destroy natural habitats in the Hoylake/Greasby area.
1115	Spatial Objective 8 should be re-worded to more clearly apply to all Settlement Areas to say: "To secure an equitable distribution of high quality green infrastructure to meet local needs for open space, sport, recreation, leisure, exercise, biodiversity and amenity across all Settlement Areas. In particular it will support the new communities planned within the Newheartlands Pathfinder and the Mersey Heartlands Growth Point in Settlement Area 2; and to address other local shortfalls in Settlement Areas 1, 3, 4, 5 and 7."
1126	Picture 4.7 needs to be clearer, to identify the locations.

## Spatial Objective 9 - Countryside and Coast

**5.19** Comments on Spatial Objective 9 were mainly directed towards:

- the need to apply this Objective to a wider area
- the need to refer to the Green Belt, sport, agriculture and biodiversity
- the need to address the Mersey coast in more detail

**5.20** A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
119	This Objective, which has been neglected over recent years, needs to apply to the whole of Wirral not just Settlement Areas 3, 4 and 8.
175	This Objective should not be limited to Settlement Area 8, should refer to protecting the Green Belt and should read: "To preserve and maintain the present Green Belt in all settlement areas with special emphasis on maintaining and enhancing the natural and semi natural character and appearance of the Borough's coast and countryside in all settlement areas and providing extended access to the Mersey coastline in Settlement Areas 3 and 4."
233	NI 197 (Local sites in active conservation management), monitoring information on SSSIs and biodiversity targets could be used to monitor progress.
343	Spatial Objective 9 would make the coast of Wirral more diverse and give more enjoyment for residents and visitors.
372	The need for urban expansion within Settlement Area 8 should be included, to meet the housing needs of the Borough, to ensure that urban expansions could be delivered without harm to Spatial Objective 9.

439	Needs to include the importance of agriculture in the environmental quality of the Borough.
549	The Mersey Coastal Park proposals will support the delivery of Spatial Objective 9.
590	Support the Objective.
626	Do not agree with any further development on coastline at Eastham.
658	Should be amended to include Settlement Area 6.
675	Support the Objective to protect them from development as far as possible and allow present and future generations access where it is safe and advisable without harming heritage or ecology.
801	Should be amended to include access to sport and recreation, particularly water sports and more land intensive sports such as golf courses, equine-related sports, motorsports venues etc., along the lines of "To maintain and enhance the natural and semi-natural character and appearance of the Borough's coast and countryside and opportunities for access to formal and informal sport facilities in Settlement Area 8..."
835	Should specifically mention biodiversity. Many species can be lost before the overall appearance of an area is changed. Inland biodiversity is danger of being overlooked but includes important habitats. Not all biodiversity is on the coast or countryside. The Objective should maintain and enhance biodiversity wherever it exists. If biodiversity cannot be included under this or another Objective, it will need one of its own.
871	There is not enough detail on the Mersey coast, to get our coastline back after it was given away by the former Bebington Borough Council.
910	Support the Objective.

## Spatial Objective 10 - Climate Change

**5.21** Comments on Spatial Objective 10 were mainly directed towards:

- the role of local food production
- the need to improve existing as well as new development
- the need to include more on adaption, renewable energy and water management

**5.22** A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
119	Should refer to local production by farmers, smallholders, allotment holders and apply to current not just new development, if climate change and peak oil are to be properly addressed.
240	Support the Objective, which should be expanded to include the role of natural greenspace, including trees and woodland, in mitigation and adaptation, cross referenced to Spatial Objective 8.
439	Should refer to local agriculture, horticulture, market gardening and allotments to reduce food scarcity. Farming is still important in Wirral.
503	Is housing east of the motorway suitable due to flood risk?
540	Support the Objective but should recognise the need for rapid change and refer to renewable energy schemes, such as the Mersey Tidal Power Project, which would use natural resources, reduce carbon emissions, diversify energy supply.
549	The Mersey Coastal Park proposals will support the delivery of Spatial Objective 10.
561	Should include more detail for integrated water management in line with RSS Policy EM5 and clarify how new development will address flood protection and migration, for example, by requiring sustainable drainage systems and water conservation measures.
590	Support the Objective.
675	Flooding should be minimised in all Settlement Areas.
893	Objective should be amended to include Settlement Area 8.
899	Merseytravel wish to move the rail network to "carbon neutral" and to source its electricity from renewable sources. Merseytravel's Environment Strategy aims for a BREEAM "Very Good" rating for all major new Merseytravel buildings such as rail stations, to complement the development of a low carbon transport system.
910	Support the Objective.
1035	Support the Objective on emissions but more needs to said about adaptation. Reducing flood risk is important but so is ensuring the future well being of biodiversity.
1102	Spatial Objective 10 should apply to all and not just "new" development.

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## Spatial Objective 11 - Public Safety

**5.23** Comments on Spatial Objective 11 were mainly directed towards air quality and anti-social behaviour.

**5.24** A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
119	Support the Objective but should be extended to include anti-social behaviour.
175	Protection of air quality should not be limited to Settlement Areas 2 and 4.
190	There is an omission in the sustainability appraisal summary.
378	Need to clarify how the safety of the air and environment in Eastham will be secured, with high levels of existing industrial development and further polluting developments planned and proposed, which will devalue and destroy the village and recreational areas at the forgotten end of Wirral.
626	Poor air quality will increase with any further industrial development and increased heavy vehicle traffic passing through Eastham Village, instead of using M53 Motorway. No air quality readings are yet available at Eastham.
675	Air quality should be regularly tested along the A41 and in the industrial areas of Bromborough and Eastham.

## Other Responses to Consultation Question 3

**5.25** Other responses, which could not easily be attributed to any individual Spatial Objective, were mainly directed towards:

- community involvement
- provision for infrastructure and community facilities
- the relationship with the Spatial Vision and Broad Spatial Options
- improvements to watercourses
- agriculture and food security
- the position of biodiversity and Settlement Area 8

**5.26** A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
22	The use of lettering in the Spatial Vision and numbering in the Spatial Objectives is confusing.
153	Agree with the Spatial Objectives.



165	Connectivity with the community is missing from the list of Objectives. The Area Forums do little to connect people in the community. More informal gatherings are needed to exchange ideas. It is not enough just to provide a website. There needs to be more connection between elected representatives and the electorate, so there is constant feedback between Councillors and the people in their community. Friends' groups prove that people want to be involved but not just as a way of reducing the Council's costs through "community transfer".
189	Agree with the Spatial Objectives.
233	The Spatial Objectives are comprehensive. It would be helpful to show how the common aspects listed in paragraph 5.4 relate to them. There is no link, other than climate change, between delivering new waste management infrastructure in the Spatial Vision and the Spatial Objectives. It may be useful to include a further reference to the Waste DPD here.
252	Agree with the Spatial Objectives.
302	Agree with the overall scope and balance of the Spatial Objectives.
314	Most of the main issues affecting Wirral are included but an objective is needed for community facilities, including places of worship. Identifying land for community use has been difficult over an extended period of time. There is a need for greater flexibility in areas allocated for employment or commercial uses which are near residential areas and accessible by public transport.
322	It is not clear how improvements to watercourses will be considered in line with River Basin Management Plan targets.
380	It is not clear how the three Broad Spatial Options will achieve these Objectives across every Settlement Area. The preferred Broad Spatial Option would, for example, suggest 'no change' in other areas which conflicts with some of the Spatial Objectives.
384	Agree with the Spatial Objectives.
439	Agriculture and food production is still of considerable significance. DEFRA Returns for 2008 indicate that a third of the Borough's land area or 4,381 hectares was still used for farming. 157 farms in Wirral, employed on average 2 persons per farm, carrying 5,886 head of livestock and 9,850 poultry, excluding goats and horses. About a third of the land devoted to agriculture was under crops. It is important that food security and the conditions necessary to sustain and promote a viable agricultural economy are given appropriate weight when considering the future pattern of Wirral's development.

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468	Agree, particularly support the protection of conservation areas, parks and the coastline.
483	Community and cultural facilities are not reflected in the Objectives.
705	Agree that these are the most appropriate Objectives.
719	Agree with the Spatial Objectives.
804	The Spatial Objectives are all "good" but there is concern over whether the Council will adhere to them. The recent decision at the "Warrens" runs counter to many of them. It is not clear how the Spatial Objectives match the list in the summary "taster" booklet. For example, no case is given for a larger population, which is certainly not an advantage as Wirral is already over populated. Why does the Council want a larger population? What is the definition of high value tourism compared to low value tourism? Where is the strategy to make the most of the current day-trip tourism? What is the strategy for waste, if as reported in the local press there are to be no more landfill sites on the Wirral?
831	Biodiversity has been lost in the process of reducing the number of Spatial Objectives, so that it comes under either Green Infrastructure or Coast and Countryside but appears to gets lost between them.
862	Settlement Area 8 is only included under Spatial Objective 9, which only focuses on natural character and landscape. Other objectives including employment and housing growth should be considered with Clatterbridge and Arrowe Park hospitals within the Area. There is also a need for an additional objective for infrastructure and services - particularly healthcare - to maintain capacity alongside any significant increase in housing numbers.

**5.27** The Council has responded to these comments by revising the Spatial Vision and the list and content of the Spatial Objectives in the Preferred Options Report<sup>(9)</sup>.

## 6 Spatial Options

**6.1** This sections outlines the responses to Consultation Questions 4 to 8, which asked for comments on the Council's assessment of Broad Spatial Options:

### The Need for Broad Spatial Options

**6.2** Comments on the common aspects underlying each of the Broad Spatial Options were mainly directed towards the inclusion of a Tourism Regeneration Focus in Birkenhead and items related to waste management; biodiversity; and green infrastructure.

9 Preferred Option 3 - Spatial Vision and Preferred Spatial Objectives 1 to 7 now refer

**6.3** A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
9	There is a lack of recognition given to tourism in and around Birkenhead. Only New Brighton and Hoylake/West Kirby are identified in the Broad Spatial Options. This ignores the huge visitor potential of the areas such as Woodside, Pacific Road, the U-Boat, Transport Museum, Tramway, Alabama, Priory, Birkenhead Park and Williamson Art Gallery. Unless Birkenhead is included as part of the tourism offer funding will be channelled elsewhere. Heritage tourism is a key economic driver and should not be overlooked.
144	"improving the quantity...of comparison retail floorspace" is inconsistent with reducing the reliance on retail employment.
268	The impact of significant housing regeneration and growth on existing and future waste management infrastructure should be acknowledged.
379	The Tourism Regeneration Focus areas are too vague and should be shown like the Employment Growth Focus areas. Any new transport links or major improvements such as highways or national cycle routes should also be shown.
401	Do not believe that the three Broad Spatial Options would deliver the amended Spatial Vision or the objectives of national or regional planning policy. All three would direct retail growth to Birkenhead Town Centre and/or to Wirral Waters. Birkenhead is identified as a sub-regional centre in RSS but Wirral Waters is a developer-led proposal with no formal planning status.
411	The approach to land supply is unclear as final evidence base documents such as the Strategic Housing Land Availability Assessment are not yet available. Expressing a preference for one of the Broad Spatial Options would be heavily dependent on the results of these studies.
461	Agree that the Strategic Regional Sites at Wirral International Business Park and Birkenhead Docks should be key elements of the Core Strategy whichever Broad Spatial Option is chosen. The new Birkenhead Docks Strategic Regional Site should be allocated as a strategic site given its crucial importance to the Core Strategy as a whole.
546	RSS sets out a figure of 500 new housing units per annum, which paragraph 7.19 allows to be exceeded where justified by evidence of need, demand, affordability, sustainability and the fit with local and sub-regional strategies. Meeting the 80% target for previously developed land is welcomed in line with RSS Policy L4 and Table 7.1.
673	The Mersey Heartlands Growth Point Programme of Development only refers to additional housing in the period 2008/17. The boundary is not referred to and delivery needs to be discussed.

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802	Improvements in the quantity of green infrastructure should be included to meet the scale of new development proposed.
936	Boosting overnight visitors should be omitted from the "common aspects" underlying all the Broad Spatial Options.
1092	The "common aspects" should explicitly include the protection, enhancement and accessibility of biodiversity and the need to meet legal obligations. The Sustainability Appraisal should be taken into account in all elements of the Core Strategy.
1121	Agree with the list of "common aspects".
1135	The use of different colour keys for the Broad Spatial Options maps in the main Report and the accompanying summary leaflet was confusing.

## Broad Spatial Option 1 - Focused Regeneration

**6.4** The responses to Consultation Question 4 - *Is this a fair assessment of the likely implications of a Broad Spatial Option based on focused regeneration? Please give the reasons for your answer* - were mainly directed towards:

- the impact of limiting opportunities for wealth creation
- the impact on needs outside the target area
- concerns about the impact on heritage, traffic, green infrastructure and biodiversity
- delivery risks
- the need for further evidence to be provided
- the approach to strategic allocations

**6.5** A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
23	Agree this is a fair assessment but Broad Spatial Option 1 could leave some communities feeling that the Council is ambivalent towards them. It does not, for example, clearly set out how much will be "supported" or "promoted" in Settlement Area 3.
56	Focused regeneration is the ugly sister trying on Cinderella's slipper. Just because you want it to fit does not mean that it will. Regeneration will occur in its own time, based on the wider social scene. Wirral needs to attract higher earners, who will raise average household incomes, leading to increased demand and growth in business.

71	Broad Spatial Option 1 fits well with the Vision and Objectives. A focus on housing and employment in Settlement Area 2 will stop over-development in New Brighton. The present regeneration plans are beneficial for the revitalisation of tourism.
120	A reasonable assessment but the impact of retail development including Wirral Waters on existing centres; public transport access to Wirral Waters; and Green Belt are not mentioned. The statement that previously undeveloped greenfield sites would not be developed until previously developed brownfield opportunities have been taken up is welcome but the Green Belt must be sacrosanct. The reference to limited housing development in Settlement Area 6 is a concern, if it damages the heritage and character of the Area.
176	Agree this is a fair assessment.
191	Agree this is a fair assessment.
219	No. The implications are not fully explained. Focused regeneration will prevent regeneration and development of under-used and vacant land in areas outside the target areas. A number of town, district and local centres outside this area are identified in need of intervention in the Town Centres, Retail and Commercial Leisure Study.
234	No. It is not clear how Broad Spatial Option 1 could deliver a high quality green infrastructure, coast and countryside and address Spatial Objectives 8 and 9 without a mechanism to allow funding to be used elsewhere. The earlier material on the Investment Strategy suggests that approach has not been successful.
253	No. A focus on Newheartlands alone will not encourage overall investment in new businesses nor create wealth, which can in turn aid regeneration. This is evident from the decline of the GVA/head. While there are plenty of properties being built in the Newheartlands and Liverpool City Centre (also within the Northern Housing Market Area) a large proportion are empty. A large number of people are on Job Seekers Allowance and Council Tax Benefit. Creating more businesses and more disposable wealth can only be bought about by encouraging new businesses to move into the area. The owners of these businesses will require quality housing, not housing within the Newheartlands.
260	Concerned that inner area regeneration may be threatened if Broad Spatial Option 1 was not demonstrably deliverable.
303	No. The evidence on housing land supply is incomplete and this Option may not deliver the required housing numbers in the first part of the plan period. Concerned over the long term impact of Broad Spatial Option 1 on local communities like Oxtan which lie outside the priority areas shown in Picture 5.1.

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321	No. Until the Integrated Regeneration Study is completed and addressed through the Core Strategy, it will not be possible to assess the implications of what might come forward at Wirral Waters and allied developments and the impact on the role of Liverpool City Centre as the regional centre.
326	The location of development should be guided by the Flood Risk Sequential Test. Development should only be considered in areas at a medium/high risk of flooding where there is a lack of available sites within areas at lower risk of flooding. The need for sustainable urban drainage to reduce flooding (including surface water flooding) should be included under the climate change implications. The delivery of water infrastructure (both potable and waste water) is also a key requirement in deciding spatial locations for development. A Water Cycle Study, required as part of the Growth Point conditions, should play a significant role in determining the spatial direction of growth.
344	Agree with only some of the implications. Other "so called" focused regeneration programmes have not worked and have not provided local employment opportunities. Programmes should address issues such as employment for local residents, in places most in need. Training for those skills and jobs needs to start now and must be ongoing. Major growth in Settlement Areas 1, 2, 3 must not harm their character or heritage.
350	Agree this is a fair assessment. It emphasises the utilisation of vacant brownfield sites generating the most growth in the areas of greatest need; creating essential housing and much needed jobs to help retain the younger population of Wirral which is ebbing away in search of employment.
373	No. The analysis should recognise that focusing on the urban area alone may result in the Council not meeting its housing requirements, due to land contamination, existing use values and other environmental and technical constraints.
385	Agree this is a fair assessment.
406	No. The moratorium in west Wirral has stopped us from being able to sell a plot of land at Thingwall. Development would help the area in terms of local employment in construction, encouraging families to move into the area, increasing the population and bringing more money into the area and would allow development to take place without infringing on the Green Belt.
440	Agree this is a fair assessment. It focuses on the older urban area and protects the Green Belt. Care, however, needs to be taken to protect existing gardens.
474	Agree this is a fair assessment.

509	Agree this is a fair assessment but delivery and 'deliverability' issue and relying on a small number of major partners are however potential risks. The Wirral Waters scheme accounts for a significant amount of the housing and economic development that is planned to be delivered under this Option. The core of the Wirral Waters project, East Float, is currently in planning. Once the project moves towards delivery, it will allow the Council to achieve Broad Spatial Option 1 in a focused, sustainable, regenerative manner.
510	In general, Broad Spatial Option 1 fits well with RSS policies. From an employment perspective, this Option would be supported by RSS Policies RDF1, LCR2, W2 and W3. Protection of employment sites would be supported by Policy W4. Retail development in Birkenhead would be supported by RSS Policy W5. It is, however, not clear if this Option means no development in other centres across the Borough.
550	From a housing perspective, this Option would support the emphasis on the inner areas in RSS Policies RDF1 and LCR2. It is, however, unclear how it would support the emphasis on support for housing market restructuring and expanding the quality and choice of housing in the outer areas in Policy LCR3.
570	No. It does not deal with the pitfalls of such a high risk strategy dependent on a small number of major projects.
592	Picture 5.1 should show a Tourism Regeneration Focus between Rock Ferry and Eastham Country Park. The implications for Settlement Areas should reflect the Mersey Coastal Park proposals within Settlement Areas 3 and 4 similar to that included under Settlement Area 6 - 'to enhance the area as a leisure and tourism destination to meet local identified needs'.
642	No. It is unclear what these inequalities are and how are they going to be reduced. Limited growth would not provide affordable housing, which needs to be distributed throughout all the Settlement Areas.
659	No. The assessment understates the problems arising from area based investment policies, which tend to ignore problems requiring investment outside the designated area, such as at Hoylake Town Centre and at Hoylake and Meols Promenades, which need to be more fully addressed.
676	Agree this is a fair assessment but greenfield land should not be used in the Bromborough area where we have already lost so much. There should be a presumption against using every square 'inch' of available land. Wirral International Business Park has caused huge traffic problems locally. Not enough trees are being planted to make the area more attractive. The Green Belt must not be encroached upon. The Council should not regard Wirral Waters as an answer to all its problems.
687	Picture 5.1 should provide a clearer explanation of the pink areas, in case they are interpreted as sites.

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688	<p>The Core Strategy must set out what the Council envisages happening within any strategic site or broad location identified. Key issues should not be left to lower level documents. The policy for any strategic site (allocation/location) would need to cover the following:</p> <ul style="list-style-type: none"> <li>• a clear objective/aim for what is intended to be achieved</li> <li>• identification of site constraints</li> <li>• all the different land uses/proposals and their scale</li> <li>• the infrastructure that is needed to make it a viable, attractive, sustainable location</li> <li>• what of the above needs to be provided by when and who will fund it and deliver it</li> <li>• for an allocation: whether further detail is to be worked up in a master plan and/or SPD and if so, the timescales for delivery</li> <li>• for a location: stating that the detail is to be worked up in later DPD or AAP specifying timescales for delivery</li> <li>• for an allocation: milestones for progression of the development, such as application submission and commencement on site, including phasing and consequences if missed</li> <li>• for a location, this should be left to the later DPD</li> <li>• for an allocation: the boundary on the Proposals Map should encompass all the area needed for the development and any related facilities, and its position can be shown on the Key Diagram</li> <li>• for a location: just a rough position on the Key Diagram shown but if a defined search area for a later DPD is to be set that also would need to be shown on the Proposals Map</li> <li>• any such proposal would need to be key to delivering the Plan's Strategy.</li> </ul>
706	Agree this is a fair assessment.
808	Agree this is a reasonable assessment. This Option will focus growth where needed but is dominated by the Wirral Waters scheme with no alternative proposals. The drive to focus development where needed is welcome alongside the role of the Green Belt to focus development into the existing urban areas.
836	The assessment appears to be fair but wider "strategic opportunities" such as the Open Golf must not detract from development in the priority areas. Success must not rely too heavily on one private company.
863	Agree this is a fair assessment. The range of housing required to support the varying market needs across the Borough will not, however, be fully provided under this Option. Development within the regeneration priority areas will need to be complemented by limited housing development elsewhere. If employment growth occurs, new housing at the upper end of the market will be required to stop senior managers etc. being drawn to housing markets outside the Borough. A potential purchaser who cannot



	find a home in central or western Wirral will not then buy a home within the Borough's regeneration areas. Economic mobility will mean that they will look further afield and outside the Borough.
894	No. Broad Spatial Option 1 would continue to lead to the further decline of the rural economy and would not address the shortage of genuinely available sites. An over-concentration of development within the urban area would be harmful to general amenity; local character; traffic generation and congestion within urban residential areas. Delivery is highly questionable. Windfall sites cannot be guaranteed. Too much emphasis is placed on the uncertain implementation of "Wirral Waters" which would fail the sequential test for flood risk set out within PPS25.
911	Broadly support the assessment of likely implications. Urban brownfield sites can also harbour valuable biodiversity assets, which may be lost or disturbed as a result of development, which should be highlighted in the SA summary. Agree that this is likely to place additional pressure on areas that are already experiencing a shortfall of green infrastructure. Areas of high deprivation would benefit from the protection and enhancement of open space and green infrastructure rather than the provision of additional green infrastructure elsewhere. A stronger requirement to maintain, create and enhance open space and green infrastructure should be included.
936	The Golf Resort has no place under Broad Spatial Option 1. It would conflict with 'previously undeveloped greenfield sites would not be developed' etc. and with statements about the 'protection of the open countryside'. The implications for Settlement Area 6 should be amended by inserting the word 'limited' before the word 'development'. The word 'tourist' should be replaced by 'day visitor'.
974	No. The proposals for Wirral Waters conflict with national policy and RSS, are not founded on a robust and credible evidence base. Large-scale development at Wirral Waters should not be brought forward outside regional policy. The proposals are a developer-led aspiration, with no planning status.
990	No. Broad Spatial Option 1 is highly vulnerable to failure. Directing 400 new homes every year into the Mersey Heartlands Growth Point in Settlement Areas 1, 2 and 3 is unrealistic. There is no need to re-populate Settlement Areas 1 and 2; no-one would choose to live there. This is social engineering at its very worst. Achieving 80% of all new housing on brownfield land is only possible if the sites are viable; attempting to achieve 80% of 600 units each year on brownfield sites under Broad Spatial Option 1 will be undeliverable and unsustainable. The development of a retail-led sub-regional destination will not make the Borough any more sustainable or solve economic and social problems. Attempts to create a high quality office-led employment hub in Birkenhead Docks will not be realised as the

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	market is not be interested in this location. Broad Spatial Option 1 will marginalise the most competitive areas of the Borough and is an unrealistic and undeliverable dream.
1036	Generally agree this is a fair assessment but it is not clear how additional green infrastructure provision will be secured or how the increased pressure on the open spaces in Settlement Area 8 will be dealt with. Mechanisms must be brought forward to ensure that these areas are enhanced and managed so that they can absorb these pressures without adverse impacts on assets such as landscape and biodiversity.
1127	No. The delivery risk of relying on a small number of sites and development partners within a concentrated urban area needs to be clarified.

## Broad Spatial Option 2 - Balanced Growth

**6.6** The responses to Consultation Question 5 - *Is this a fair assessment of the likely implications of a Broad Spatial Option based on balanced growth? Please give the reasons for your answer* - were mainly directed towards:

- choice, risk, flexibility and sustainability
- impacts on green infrastructure, biodiversity and garden land
- economic impacts and benefits to local centres
- flood risk
- the impact of tourism in Hoylake
- the scale of development in the RSS Rural Area and sub-Option 2A

**6.7** A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
24	Agree this is a fair assessment. Would strongly support Option 2A.
46	Agree that Broad Spatial Option 2 should be implemented to allow housing growth more widely in outlying areas to come forward to development.
57	Agree this is a fair assessment. Balanced is better and fairer and more likely to bring success. A wider selection of housing stock gives the population a proper choice of lifestyle. Choice brings satisfaction and satisfaction brings people, which is the objective of this project.
63	Agree with Broad Spatial Option 2. Would like to see greater encouragement for development in other sustainable urban locations across the Borough alongside essential growth in the regeneration priority areas.

72	Broad Spatial Option 2 is not preferred. New Brighton has good transport links which make it accessible but development on top of what is already planned could have a negative impact on the resort. Local distinctiveness is what makes the area so attractive and we value this.
121	A reasonable assessment but some aspects are not adequately reflected. The impact of Wirral Waters; of wider housing development on the Green Belt; on existing town centres or the fact that wider housing and other development may arise in unsuitable locations in west Wirral to damage heritage and character are not mentioned.
155	Anything "balanced" will have a wider level of support. Would not this be the natural economic outcome after a successful Focused Regeneration Option. Focus on priorities first, create economic growth and wider "growth" follows.
177	Agree this is a fair assessment.
192	The analysis does not take into account the increasing potential of highly skilled professionals in west Wirral to work from home.
221	Broad Spatial Option 2 will allow the vitality and viability of existing town, district and local centres to be maintained and enhanced throughout the Borough; will maximise the beneficial use of previously developed and vacant land; allow existing centres to continue to provide a focus for employment, retail and service facilities in accessible locations; and support regeneration and development in the coastal resorts. Broad Spatial Option 2 would also allow the need to maintain and enhance the role of key service centres in the outer and rural areas, identified in RSS, to be achieved.
235	Appears to be a fair assessment. There is a risk that a change from Broad Spatial Option 1 to Broad Spatial Option 2 may be needed during the plan period. Broad Spatial Option 2 seems to provide a more balanced set of priorities which does not unduly favour east Wirral. It also sets some key development objectives for other Settlement Areas. This would lead to a wider spread of development, helping to reduce commuting distances. No indication is given of whether Wirral Waters, which would deliver Wirral's housing targets at a stroke, has influenced the decision not to prefer Broad Spatial Option 2, because if Wirral Waters goes ahead as planned Broad Spatial Option 1 would be delivered regardless.
254	No. Increasing quality housing stock in the urban areas will increase revenue to pay for socio-economic policies in Settlement Area 1 by generating additional Council Tax; increasing households with higher skills and incomes; mirroring the economic prosperity that already occurs in Settlement Areas 6 and 7; reducing the amount that high and middle income families spend outside the area; attracting higher value business activity linked to higher

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	quality housing; increasing employment in the building trade; and will reduce the carbon footprint of people commuting to Liverpool from Deeside and Flintshire.
269	Broad Spatial Option 2 seems to carry more overall benefits whilst at the same time providing the opportunity to promote initiatives such as Wirral Waters and the Golf Resort. The RSS concept of the Liverpool City Region should also be taken into account.
304	No. The short reference to sub-Option 2A is not further explained or assessed against the Spatial Objectives. This sub-Option, concentrating development to the east of the motorway, would appear to offer many of the advantages of focused regeneration but without the risk of choking off worthwhile development in the surrounding urban areas. In the event that the Strategic Housing Land Availability Assessment shows that there is an inadequate supply of developable housing sites to meet needs in the first ten years of the plan period, this sub-Option could well perform best in meeting the Spatial Objectives.
325	The location of development should be guided by the Flood Risk Sequential Test. Development should only be considered in areas at a medium/high risk of flooding where there is a lack of available sites within areas at lower risk of flooding. The need for sustainable urban drainage to reduce flooding (including surface water flooding) should be included under the climate change implications. The delivery of water infrastructure (both potable and waste water) is also a key requirement in deciding spatial locations for development. A Water Cycle Study, required as part of the Growth Point conditions, should play a significant role in determining the spatial direction of growth.
327	Agree this is a fair assessment of an Option that proposes a dispersed pattern of development which would not achieve Wirral's regeneration objectives.
345	Balanced Growth is the way forward. It is wrong to exclude Liscard. Birkenhead should not be the be all and end all for shopping. If Liscard was made into a better shopping area, to encourage new retailers to open shops, there would be more employment prospects for the whole of Wallasey. Supporting focused regeneration would lead to the loss of major funding from areas like Seacombe, Egremont and New Brighton.
351	Agree this is a fair assessment. This Option is likely to conflict with the stated priorities for the rural area, as well as undermine targeted regeneration of areas most in need.

374	Broad Spatial Option 2 may still not provide the range of sites required to deliver the RSS and Growth Point housing requirements. RSS Table 7.1 allows 20% of development be met on greenfield sites. Broad Spatial Option 2 is, therefore, also unrealistic.
381	Broad Spatial Options 2 offers a fair and realistic distribution of growth across all existing settlements, with some primary housing focus in the main urban areas.
386	Agree this is a fair assessment.
441	Agree this is a fair assessment.
462	Directing growth and investment to the older inner urban areas of east Wirral is supported, the Core Strategy must provide a clear framework for the Borough as a whole. Broad Spatial Option 2 would allow development in other sustainable urban locations and offer a wider choice of housing outside the regeneration priority areas. It would also allow employment needs to be met across a wider range of existing employment sites, which is preferable to Broad Spatial Option 1. The question of whether strategic allocations or broad locations should be identified is equally relevant to Broad Spatial Option 2 and sub-Option 2A. The allocation of the new Birkenhead Docks Strategic Regional Site as a strategic site would be appropriate given its importance to the strategy as a whole.
475	Agree this is a fair assessment.
517	Broad Spatial Option 2 would still focus employment in Strategic Regional Sites but other sites could also play a higher role. Retail development would still be located in Birkenhead but again district and local centres outside these areas would also have a role, in line with RSS Policies RDF1 LCR2, W2 and W3.
521	Broad Spatial Option 2 is still unbalanced if communities in West Kirby and New Brighton have tourism and the Mersey side of the Borough has only factories.
551	Broad Spatial Option 2 retains an emphasis on development in the older inner urban areas in line with RSS Policies RDF1 and LCR2 but also directs growth more widely across the urban area. The secondary focus would, however, cover both the outer area to the east of the M53 and the rural areas, where RSS Policy LCR4 would require the provision of housing to only address barriers to affordability and identified local needs.
571	Agree this is a fair assessment. This approach is more realistic, flexible, deliverable and sustainable. Do not agree with the Council's conclusion at paragraph 5.51.

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662	No. The benefits from spreading investment and development more widely should be more fully set out.
665	A re-direction of new housing development across the Borough should be encouraged. Maintaining an emphasis on east Wirral is not justifiable given the economic situation and the demand for homes across the area. Unless areas outside east Wirral are utilised there will be a severe housing shortage. A mix of new housing is required to enable movement to occur. Small, single plots such as at Lingdale Road, West Kirby can contribute to the mix of housing without impacting on local amenity.
677	It may be a fair assessment but would not be pleased with over-development in Bromborough. The prospect of using flood-risk areas is not acceptable. Broad Spatial Option 2 would not, generally, be helpful.
689	Paragraph 5.35 should state that the proposed Golf Resort is in the Green Belt and that any application would have to set out very special circumstances in accordance with PPG2.
707	Broadly agree that this is a fair assessment of the likely implications.
809	Agree this is a fair assessment. It will dilute the impact on the areas most in need.
837	The proposed Hoylake Golf Resort would have serious wildlife, flooding and Green Belt implications, which would add to the difficulties of developing a new course. Existing golf courses seem to be struggling. A new course would need year-long income not just the occasional big event.
838	Broad Spatial Option 2 would also have impacts on green infrastructure networks, through the loss of large gardens to infill development, which can be useful stepping stones forming networks in neighbourhoods with large gardens. While large gardens are not necessarily more important for wildlife than small ones, they do allow for larger structures and extensive shrubbery, which increases the range of wildlife able to exploit them. A number of remaining badger setts are in such groups of large gardens, where they are protected from badger baiters.
864	This is a fair assessment of Broad Spatial Option 2 but the approach is very similar to Broad Spatial Option 1. Allowance must be made for residential development outside the limited areas considered under Broad Spatial Option 2, if the anticipated level of housing and employment development is to be realised, beyond the provision of only specialist, affordable or intermediate housing.
865	Agree this is a fair assessment. This Option allows for sites falling outside the regeneration priority areas to be considered more positively and allows for a more realistic approach to housing needs and demands, recognising that there are distinctively different markets in different parts of the Borough.

895	No. Disagree that this is a fair assessment because of the same problems identified with Broad Spatial Option 1.
912	Generally agree with the assessments under local distinctiveness; green infrastructure; countryside and coast; and climate change. Broad Spatial Option 2 will carry similar risks and implications to Broad Spatial Option 1 in terms of compromising biodiversity assets on brownfield sites, which needs to be recorded in the implications and in the SA summary.
937	Agree this is a fair assessment, with the exception of the references to tourism development in Settlement Area 6. The Tourism Regeneration Focus should be deleted from Picture 5.2. Paragraph 5.35 should be reworded to read "Broad Spatial Option 2 (and 2A) could continue to support limited regeneration and development in the coastal towns of Hoylake and West Kirby and to promote key tourism and leisure destinations in New Brighton", as anything more would be inconsistent. All the words before 'moderate' should be deleted in the implications for Settlement Area 6.
1037	Broad Spatial Option 2 is still consistent with national and regional policy but is likely to be less effective in securing the regeneration of east Wirral. As it is difficult to see any specific advantage over Broad Spatial Option 1, the conclusion not to prefer Broad Spatial Option 2 is supported.
1090	Broad Spatial Option 2 blended with Broad Spatial Option 3 would be a much more sensible and pragmatic approach offering significant opportunities for sustainable growth, delivering meaningful regeneration attractive to the market, enabling public funds to be spent on sensible projects, protecting the taxpayer from profligate expenditure and risk. Retail and office growth at Wirral Waters would still, however, be a disaster.
1099	Broad Spatial Option 2 would assist to regenerate less popular areas containing properties that are poorly designed, laid out and constructed and difficult to insulate.

## Broad Spatial Option 3 - Urban Expansion

**6.8** The responses to Consultation Question 6 - *Is this a fair assessment of the likely implications of a Broad Spatial Option based on urban expansion? Please give the reasons for your answer* - were mainly directed towards:

- the need for additional development land
- environmental impacts including the loss of agricultural land
- flood risk
- national and regional policy
- delivery
- sustainability

**6.9** A summary of each of the comments received is set out in the table below:

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ID	Summary of Responses Received
26	Agree this is a fair assessment. Broad Spatial Option 3 had to be stated as it clearly does exist but if any part of Option 3 had to be adopted at any time within the plan period, it would be a total failure on the part of the Council.
58	The Council's objectives can be met without infringing on existing Green Belt areas. A diminished Green Belt would make Wirral less attractive. Once gone, it could never be regained.
73	Strongly object to any intrusion on the Green Belt. The natural environment must be protected. There is sufficient space in the brownfield area of Settlement Area 2 to build extra housing and employment opportunities without having to take up any more greenfield sites.
122	In general a reasonable assessment although some aspects are not adequately covered, such as the impact of Wirral Waters on other town centres and public transport access to Wirral Waters. Question the need to promote such aggressive development or merely accept the economic position Wirral would be in after implementing other alternative strategies. The words 'additional enabling development' are not explained and the impact on the character and heritage of traditional urban areas especially in west Wirral is not mentioned.
145	If the Council wants to attract business and people to Wirral, the Green Belt must be preserved and maintained as it is.
156	Bound to be emotive, particularly with residents West of M53 anxious to ensure Green Belt is untouched. Even prioritising Green Belt in the Outer Area over Green Belt in the Rural Area is likely to be unacceptable. Would housing in this area, because of its location, not cease to be affordable and outside the reach of the new employees/residents for whom it was intended. Broad Spatial Option 3 is for a variety of reasons a non-starter.
178	Agree this is a fair assessment. Broad Spatial Option 3 must be avoided at all costs, if the identity and character of Wirral is to be protected and maintained.
193	No. A further disadvantage of Broad Spatial Option 3 is the loss of productive agricultural land when increasing pressure on food production is expected.
236	Agree this is a fair assessment. Broad Spatial Option 3 is sub-optimal for a range of reasons. If the evidence base suggests a fairly plentiful supply of brownfield land, and if regeneration of inner Birkenhead will re-use housing land in the currently deprived wards, there will be little justification for sprawling out into Settlement Area 8. As this development is likely to be dominated by housing and job growth will continue to be concentrated in the east, this will lead to an increase in commuter miles.



255	Agree this is a fair assessment.
260	Broad Spatial Option 3 which indicates Green Belt land release is not supported.
324	The location of development should be guided by the Flood Risk Sequential Test, which is not touched upon within the Sustainability Appraisal Summary for Broad Spatial Option 3. Development should only be considered in areas at a medium/high risk of flooding where there is a lack of available sites within areas at lower risk of flooding. The need for sustainable urban drainage to reduce flooding (including surface water flooding) should be included under the climate change implications. The delivery of water infrastructure (both potable and waste water) is also a key requirement in deciding spatial locations for development. A Water Cycle Study, required as part of the Growth Point conditions, should play a significant role in determining the spatial direction of growth.
328	Agree this is a fair assessment. It is likely to be contrary to national policy and to run against the strategy of sustainable urban regeneration outlined in RSS.
352	Agree this is a fair assessment. For all the reasons outlined it seems that Broad Spatial Option 3 is unacceptable. It requires a change to Green Belt policy, significant and on going additional controls, further investigation into infrastructure support and undermines the regeneration of the urban area.
375	No. The assessment is based on the assumption that the majority of development would be on urban expansion sites. Not all development would need to be located in urban extensions and urban regeneration could still be the focus for new development. A sequential approach to meet the spatial priorities of the RSS could still be maintained but urban expansion sites will inevitably be required to meet RSS targets.
387	Agree this is a fair assessment.
442	Agree this is a fair assessment. Broad Spatial Option 3 would permit development outside existing urban areas and impinge on the Green Belt.
463	Agree this is a fair assessment. It is doubtful whether Broad Spatial Option 3 is realistically deliverable and whether this Option would be capable of delivering the Spatial Vision and Spatial Objectives set out.
470	Agree this is a fair assessment.
476	Agree this is a fair assessment.
507	Against any expansion into areas designated as Green Belt.

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524	Do not understand the meaning of "replacement" with regard to the Wirral International Business Park. Either way, this is not in line with RSS Policy W2.
525	House types should include fewer flats and more 3/4-bed houses with front and back gardens, like the development of Woodchurch, before the blight of multi-storey flats and maisonettes.
552	Broad Spatial Option 3 would still focus development on the inner areas as outlined in RSS Policy RDF1 and LCR2 but the significant focus on the outer and rural areas is unlikely to meet the policy focus set out in RSS policies LCR3 and LCR4.
572	Agree this is a fair assessment. This would be contrary to a number of national, regional and local policies, and in the majority of cases, encroachment into the Green Belt should be resisted. This is not to say that all development within the Green Belt should be precluded. It should, however, be restricted to extremely special circumstances. This may, for example, include affordable housing schemes in areas with identified local needs; care home style accommodation where there is an identified need; essential sports facilities where there is an identified local need etc.
646	No. Picture 5.3 paints an unrealistic picture of growth in equal amounts around each settlement. Some land would not be suitable, some land constrained and some areas are needed to prevent coalescence. It is not accurate enough to illustrate urban expansion in a way which would not occur. This level of growth is also unlikely to be necessary to meet community needs.
661	The current imbalance of population with a predominance of elderly people in some parts of West Wirral, will only be reduced if more younger people move into the area. This requires new housing suitable for younger families; implying that some peripheral expansion of existing settlements may be required. Further careful consideration needs to be given to these matters.
678	Broad Spatial Option 3 is not acceptable as it would lead to irrevocable encroachment on what has drawn many to live in Wirral. Transport issues would also be very difficult to resolve. We value, very highly, our attractive and very necessary Green Belt, which deserves careful protection.
690	Other options would be preferable should enough land be available. Any proposal to extend into the Green Belt would have to be justified against alternatives and exceptional circumstances would have to be proven. You would also need to liaise with 4NW on whether any such changes would be considered strategic or localised. The Report is correct in pointing out the pitfalls in this approach when considering it against the Spatial Objectives and by pointing out that circumstances may have markedly changed by the end of the plan period.

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708	Broadly agree this is a fair assessment.
759	The Green Belt, as it is, must be preserved at all costs.
765	The Green Belt must remain inviolate. This is absolute. One concession will cause the whole lot to give way.
771	The creeping industrialisation of Eastham must be reversed.
772	The area adjacent to the Ship Canal and to the QEII dock, identified as 'employment land' and whose status was changed in the last 'development plan' should be re-zoned as Green Belt or as amenity land. Why is Green Belt always under threat? Shouldn't industrial land be under threat?
806	Broad Spatial Option 3 is likely to be the least preferred. The review of Green Belt boundaries could have potential implications for existing and proposed land used for sport and recreation. PPG 2 and PPG 17 acknowledges that land and buildings used for sport and recreation are appropriate within the Green Belt and that the countryside around towns provides a valuable resource for the provision of sport and recreation.
810	Agree this is a fair assessment as this will dilute effective development in the urban areas and would lead to inappropriate development in the Green Belt contrary to national policy and would surely generate much local opposition.
839	Do not support Broad Spatial Option 3 because of the potential harm to wildlife. The implications should refer to impacts on biodiversity. Many important wildlife sites at the urban fringe would suffer if cut off from the wider countryside. Broad Spatial Option 3 is therefore likely to be directly harmful to biodiversity. Picture 6.3 shows many sites in the Green Belt which are remote from services and infrastructure such as public transport, schools and shops, which would be unsustainable in a world of global climate change and Peak oil. The retention of a tight Green Belt helps to protect a number of important wildlife sites, wide-ranging species which are difficult to protect through site designations, and foraging areas for legally protected species.
896	Agree this is a fair assessment.
913	Generally support the assessment of the likely implications. We have particular concerns relating to the extent of likely development on greenfield land that would occur under this option and the potential impacts on rural character, local distinctiveness and the separation of settlements.
938	Agree this is a fair assessment.
991	Broad Spatial Option 3 blended with Broad Spatial Option 2 would be a much more pragmatic approach, offering significant opportunities for sustainable growth, which would deliver meaningful regeneration and be

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	attractive to the market, enabling the public funds to be spent on sensible projects, protecting the taxpayer from profligate expenditure and risk. Do not agree that sub-Option 3A is worth considering and would support a review of the Green Belt.
1038	Agree that Broad Spatial Option 3 is the least appropriate and should not be pursued. The lack of fit with regional policy and the adverse implications for environmental assets confirm that this approach should not be favoured.
1133	Comments regarding an unwillingness to undertake a Green Belt study could prejudice the decision of neighbouring authorities to progress such studies to meet their housing and employment needs. Recognition that this may be required in other parts of the City Region would be welcomed. The conclusion that no Green Belt release is necessary can only be made following the completion of the Strategic Housing Land Availability Assessment.

## Responses to Consultation Question 7

**6.10** The responses to Consultation Question 7 - *Do you agree with the Council's conclusion that Broad Spatial Option 1 - Focused Regeneration is most likely to be the preferred option for the future development of Wirral? If not, please indicate which Broad Spatial Options you would prefer and explain the reasons for your preference* - were mainly directed towards:

- the impact on economic growth
- the impact on communities outside the regeneration priority areas
- the reliance on Wirral Waters
- delivery, viability, flexibility and choice
- compliance with existing national, regional and local policies
- the impact on environmental assets including the Green Belt
- the need for further evidence to be provided

**6.11** A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
27	No. Broad Spatial Option 1 could leave some communities bordering on the area feeling that the Council is ambivalent. It does not set out how much will be "supported" or "promoted" in Settlement Area 3.
55	No. Focused Regeneration is unrealistic. In Boston, New York and Sydney re-invigoration of dense urban areas through city projects was tried and failed. It was only when the GDP of the area increased through socio-economic upward mobility that natural increases in building prices brought young urban dwellers back to these areas. Success brings success.

59	No. Balanced Growth is preferable because it will make a higher proportion of the rate paying public happier; will increase the income of the Council and lead to better social services; will make Wirral attractive to a broader spectrum of the population; increase the demand for housing; which will lead to regeneration.
74	Broad Spatial Option 1 is preferred.
106	Do not support Broad Spatial Option 3 due to the potential impact on the Green Belt, the impact on the separation of settlements and the impact on the character of the area.
123	Broad Spatial Option 1 is preferred.
124	Broad Spatial Option 1 is preferred.
140	No. Local labour in the residential construction industry in west Wirral has been curtailed by the economic situation and by the Council's Interim Planning Policy for New Housing Development. While supporting the preservation of the Green Belt, it is logical to allow the re-development of existing sites such as redundant nursing homes, public houses, schools, farms and garages in west Wirral, to stimulate the local housing market and provide much needed employment in the construction sector. Support Broad Spatial Option 2.
154	Broad Spatial Option 1 is preferred. It may appear a little "parochial" but is the only realistic route to achieving economic goals. The Spatial Vision cannot be achieved with c.30% of the population living in high deprivation. There may be concerns about the need for affordable housing but low cost rented accommodation may not always have a positive impact on an area.
166	Partly. There is not enough about collaboration with Liverpool. Wirral is not an economic powerhouse. Instead of looking to build Wirral Waters, accept that Wirral is about providing housing and landscapes for all of the people of Greater Liverpool. Birkenhead Docks could be turned into an eco-park?
179	Broad Spatial Option 1 is preferred.
194	Broad Spatial Option 1 is preferred.
222	No. Broad Spatial Option 1 will discourage and prevent the improvement and enhancement of town, district and local centres outside the target area and will not allow identified deficiencies and concerns to be addressed.
237	No. Broad Spatial Option 1 will perpetuate the existing structure of the District. While this will take development pressure off Settlement Area 8, the concentration of newer facilities will neglect the other communities, where further investment is also likely to be required to balance regeneration outside Birkenhead. Broad Spatial Option 2 would not align with the Council's Interim

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	<p>Planning Policy for New Housing Development. It seems that the 11 Spatial Objectives may not be weighted equally. A viable Spatial Option should be able to demonstrate a good fit with most or all the policy objectives, even if this is at the expense of a perfect fit with one or two of the key ones. There may, in any case, be need to be a change from Broad Spatial Option 1 to Broad Spatial Option 2 during the time period for the Core Strategy, dependent on the findings of housing and employment land studies and other, external drivers.</p>
256	<p>No. Creating and increasing housing stock in the urban areas will increase the number of entrepreneurs, investing business principals and top management coming to the area bringing businesses, creating employment and wealth. This would generate Council income; increase the number of households with higher skills and incomes; mirror the economic prosperity that already occurs in Settlement Areas 6 and 7; reduce the number of high and middle income families spending outside the area; ensure that higher value business activities are linked to higher quality housing. Additional housing in these Areas will contribute to the overall wealth of the region, as they already do, as most of these areas have the highest skills and household incomes (highest 20% national index).</p>
275	<p>Broad Spatial Option 1 is preferred because traffic congestion "pinch points" would be made worse by development outside the core area and "infill" is not supported.</p>
305	<p>No. Prefer sub-Option 2A because of the potentially long term negative impact of very tight geographical constraint on local communities like Oxtown which lie outside the priority areas under Broad Spatial Option 1. This level of restraint has already had some negative impact in preventing the provision of valuable and appropriate housing opportunities within Oxtown Conservation Area, as a component of a mixed use development on the former bank site. It is likely that further housing redevelopment opportunities will occur on brownfield sites within and adjacent to the Conservation Area which, with the appropriate controls as recommended in the recently submitted Conservation Area Management Plan, could make a positive contribution to its character and economic vitality.</p>
334	<p>Broad Spatial Option 1 is preferred, subject to the final approach ensuring consistency with the Liverpool City Region policies of RSS. This is because there are specific references elsewhere within the Spatial Options Report, in relation to office and retail development, which appear to challenge the priorities and hierarchy set out for the Liverpool City Region in RSS Policies LCR1 and LCR2. The preferred approach to housing distribution would, however, be consistent with the spatial priorities of the Liverpool City Region.</p>
340	<p>No. Prefer balanced growth under Broad Spatial Option 2.</p>
353	<p>Broad Spatial Option 1 is preferred.</p>

370	No. Agree that the focus for most development should be the urban area(s) in east Wirral, directing nearly all future housing provision to this area would be a mistake. Reliance on Wirral Waters would be a mistake. There is no guarantee that this site will come forward as quickly as first imagined, particularly given the economic downturn. The Council needs to consider whether the supply will be in the right place and sufficiently diverse, given the length of the plan period involved. Sufficient flexibility should be built in, in case Wirral Waters does not deliver the numbers expected to the right timescale. West Wirral should be considered to provide additional housing, particularly in the urban area of Hoylake. Greenfield development, even the release of Green Belt land, is not always unsustainable. Small scale limited land release can help provide tourism and other benefits.
373	No. Broad Spatial Option 1 is too inflexible and there needs to be greater choice of potential areas to develop, including urban extensions.
388	Broad Spatial Option 1 is preferred.
418	No. The appropriate evidence base is not complete. Dismissing the need for Green Belt release to satisfy RSS housing requirements must be tested by the findings of a Strategic Housing Land Availability Assessment.
443	Broad Spatial Option 1 is preferred.
469	Broad Spatial Option 1 is preferred.
477	No. Broad Spatial Option 2 would be more ideal. More provision for employment growth is needed. If you are planning housing, you need to provide jobs as well.
509	Broad Spatial Option 1 is preferred.
530	Broad Spatial Option 1 is preferred.
573	No. Broad Spatial Option 1 is too dependent on a small number of major schemes and is too inflexible.
592	Broad Spatial Option 1 is preferred at it offers the strongest support for national and regional priorities and public investment to maximise the potential social, economic and environmental benefits of major urban re-development opportunities.
607	Broad Spatial Option 1 is preferred.
629	No. Broad Spatial Option 1 focuses solely on development in east Wirral. Greenfield land on the border of Eastham should remain undeveloped. People here should be able to enjoy as reasonable a standard of life as those residing in west Wirral. Eastham Village and Eastham Country Park are in a rural setting and should be treated as such.

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640	It is not clear how each of the three Broad Spatial Options will achieve the Spatial Vision across all the Settlement Areas on Wirral.
653	No. Broad Spatial Option 1 would not deliver across Wirral as a whole and conflicts with the vision for 'reducing inequalities'. Broad Spatial Option 2 offers a more realistic and equal distribution of growth.
663	No. The decline in Hoylake centre and the coastal promenade are the result of a lack of investment in the past. Broad Spatial Option 1 will further starve these areas of investment in the future. The more broadly based Broad Spatial Option 2 is preferred because, whilst prioritising the worst areas of east Wirral, it will also allow appropriate development and investment in west Wirral.
671	No. It is difficult to comment on Broad Spatial Option 1 until key evidence base studies, such as the Strategic Housing Land Availability Assessment are available.
679	Broad Spatial Option 1 is preferred.
709	Broad Spatial Option 1 is preferred.
720	Broad Spatial Option 1 is preferred.
746	Broad Spatial Option 1 is preferred as this makes best use of redevelopment land and hopefully secures the Green Belt from further intrusion.
748	No. Support Broad Spatial Option 2, as the current moratorium is stifling virtually all development on the west of Wirral. People who want to buy a brand new, more environmentally friendly property on the west side of Wirral are being forced to move into Cheshire or North Wales. The Council must be missing out on Council Tax and there will be considerably more emissions if cars then have to be driven from Cheshire or North Wales to jobs in Wirral.
767	No. Whilst urban regeneration is supported, planning policy has to deliver a wider range of objectives including sufficient new homes. Broad Spatial Option 1 will not deliver the amount of new homes envisaged. The apartment market is severely depressed. Banks will not fund their development or support mortgages on them. RSLs will not take apartments as affordable housing. A strategy that focuses on apartment development will therefore fail to deliver the new homes needed, including new affordable homes. There is no evidence that the current Wirral Waters proposals are more than just speculative and there are serious doubts about whether the scheme will be delivered as proposed. This and any other paper-only apartment scheme should not be included in housing land supply estimates. All house builders are now focusing on delivering lower density family dwellings where the market is stronger and viability more robust. The Core Strategy must reflect this reality. A focus on regeneration also raises serious concern over development viability, especially with future constraints on public funds.



	<p>Without public subsidy, developments such as East Float will depend upon development costs and sale values. Development costs are increasing while sales values are declining. Zero affordable housing could be argued but will fail to deliver affordable homes. A more balanced strategy is needed along the lines of Broad Spatial Option 2 and Broad Spatial Option 3. The Strategic Housing Land Availability Assessment will assist by identifying and assessing potential residential sites across the Borough, some of which will score well in terms of their availability and deliverability and will be capable of delivering lower density family housing as well as affordable homes. Sites should be identified in west Wirral to support local needs and affordable homes; sustainable urban extensions including greenfield/Green Belt land should be considered; policy support for new homes should be extended to sustainable locations across the existing urban areas. The whole of the urban area along the east side of Wirral should be included.</p>
806	<p>Broad Spatial Option 1 and Broad Spatial Option 2 will offer opportunities to address local needs in relation to indoor and outdoor sports facilities. Broad Spatial Option 2 has the potential to address local needs beyond the regeneration priority areas by spreading the benefits of improvements to existing infrastructure over a wider area. Broad Spatial Option 3 is least preferred.</p>
811	<p>Broad Spatial Option 1 is most likely to generate the required growth. This Option is supported by the preservation of existing Green Belt boundaries, halting inappropriate development outside the area and so focusing development into the existing urban areas.</p>
840	<p>Broad Spatial Option 1 is preferred, as giving the best results for wildlife, although appropriate safeguards including the ecological survey of all previously-developed land will be needed, so that the small number of sites that have developed good biodiversity can be protected from development, suitably managed and interpreted. The Bidston Moss landfills are now under good management but access is poor and continued funding for education and interpretation is needed. This could be addressed as a condition of development if and when the adjacent Bidston Dock is developed. Bidston Dock itself needs an ecological survey, as ground-nesting birds have been sighted. Mitigation such as extensive green roofs may be required.</p>
867	<p>No. Broad Spatial Options 2 and 3 give more scope for further development across west Wirral. The full range of housing offer required to support the varying market needs in different parts of the Borough cannot be provided under Broad Spatial Option 1. Broad Spatial Option 3 would enable Green Belt to be released, where this would not significantly reduce the separation between settlements, subject to any additional controls to reflect the priorities of RSS. Broad Spatial Option 3 provides greater flexibility and allows for a more realistic approach to housing needs and demands.</p>
897	<p>No. Prefer Broad Spatial Option 3.</p>

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914	Broad Spatial Option 1 is preferred. Would not support Broad Spatial Option 3, due to the loss of greenfield and Green Belt land and likely adverse effects on natural environmental assets, open space, recreation, human health and the enjoyment and conservation of biodiversity, even though avoiding any development on Green Belt land could increase pressure for development on land that may be more environmentally sensitive elsewhere. The likely effects of Broad Spatial Options 1 and 2 on the natural environment are broadly similar. Broad Spatial Option 1 is, however, preferred at it would appear to offer slightly better opportunities for the conservation and enhancement of local distinctiveness.
939	Broad Spatial Option 1 is preferred but modified to exclude tourism proposals for Settlement Area 6.
962	Support Broad Spatial Option 1 and Broad Spatial Option 2 which seek to focus future development and investment within the defined urban area whilst supporting development within other sustainable locations within the Borough.
969	Broad Spatial Option 1 is preferred but special attention must be paid to the impact on character and heritage. The role of tall buildings will need to be clarified together with the implications of high density development for the historic environment.
992	No. A mix between the Broad Spatial Option 2 and Broad Spatial Option 3 would best serve the Borough.
1009	Broad Spatial Option 1 is preferred to complete the development of existing Strategic Regional Sites and continue to focus on priority regeneration areas in line with RSS and the joint Liverpool City Region response to the new Regional Strategy.
1025	No. Broad Spatial Option 2, which includes a strong focus upon directing growth more widely across existing urban areas, would be the most appropriate. This would mean that prioritising growth and investment in regeneration priority areas would not be at the expense of other, accessible urban locations such as Croft Retail and Leisure Park. Broad Spatial Option 2 would also allow for sites in addition to those in Birkenhead and/or Wirral Waters to be considered for new development, reducing the need to travel from outlying areas, ensuring the ongoing vitality and viability of existing centres and facilities outside the northern end of the Borough.
1030	No. All three Broad Spatial Options seek to direct retail growth to Birkenhead Town Centre and/or Wirral Waters. Birkenhead is identified in RSS as a sub-regional centre but Wirral Waters is a developer-led aspiration with no planning status, which should not be the focus of major retail development. The Spatial Options Report supports the scale of development envisaged for Wirral Waters without this having been properly assessed at regional

	level or granted planning permission. The scale of the retail aspirations outside a regional or town centre set out in the developer-led Strategic Regeneration Framework, to which the Council proposes to give weight, is clearly contrary to the adopted Development Plan, in direct conflict with a number of key regional planning policies, in the absence of an appropriate evidence base and full assessment through Regional Planning Policy. PPS12 states that "...choices made...where growth should take place should follow national and regional policy." The quantum of development proposed at Wirral Waters was not envisaged in the adopted RSS and will affect the adopted retail hierarchy. The 'Broad Spatial Options' are therefore contrary to national and regional planning policy, including the sequential approach in PPS4 (not PPS6 which is incorrectly referenced throughout the Spatial Options Report. The first priority for major new commercial and retail floorspace should be the regional centres of Liverpool and Manchester. Wirral is a second priority, within which a development of the scale proposed is not appropriate. The proposals at Wirral Waters are of a sufficient scale to be classed as new out-of-centre shopping centre that will change the role and function of existing centres and Wirral is not specifically mentioned under RSS Policy W1, W2 or W5.
1039	Broad Spatial Option 1 is preferred.
OD6	No. Support a balanced approach so that other areas, such as Liscard, can be made into a better shopping area for local people. It is still important to look at the more local needs of residents in other urban areas as under Broad Spatial Option 2.

## Alternative Broad Spatial Options

**6.12** The responses to Consultation Question 8 - *Is there another Broad Spatial Option that you think the Council should consider before coming to a conclusion on the preferred options for the Core Strategy for Wirral? If yes, please set out the main elements of the alternative Broad Spatial Options that you think the Council should consider* - were mainly directed towards:

- the need for a more flexible, hybrid Option
- a greater focus on employment
- the lack of a strategy for areas within the Green Belt
- the role of tourism

**6.13** A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
28	No alternative Broad Spatial Option is suggested.

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75	No alternative Broad Spatial Option is suggested. As long as the southern part of Settlement Area 1 including Liscard and Seacombe receives a fair share of investment opportunities and it is not focussed entirely on Birkenhead.
125	No alternative Broad Spatial Option is suggested.
167	The Spatial Options Report appears to work on the principal of "build it and they will come". In the USA, the personal computer industry was started by people working in their garages. They didn't need huge buildings because their overheads were too great for fledgling companies. This country should be encouraging something similar; Kitchen Table Entrepreneurs providing masses of new tiny enterprises that may provide the basis of new industries.
195	No alternative Broad Spatial Option is suggested.
238	Not if the Broad Spatial Options are defined primarily by the need to deliver housing and job growth.
257	No alternative Broad Spatial Option is suggested.
276	No alternative Broad Spatial Option is suggested.
354	No alternative Broad Spatial Option is suggested.
376	All three Broad Spatial Options are too inflexible. An additional alternative would be "urban maximisation and urban expansion", to give priority to deliverable previously developed urban sites and, where development needs cannot be met on deliverable sites within the urban area, urban expansion sites adjacent to existing urban areas, with a focus on the Assisted Areas as shown on Picture 4.1. This would be the most flexible approach in accordance with national and regional policy and would not require a strategic review of the Green Belt although local alterations would be necessary.
422	An alternative is needed that draws on elements of Broad Spatial Option 1 and Broad Spatial Option 3, which would follow the spatial priorities identified in RSS and favour sites within the RSS Outer Area. This would still support for the regeneration priority areas but would also allow development within the wider urban areas of Settlement Areas 1, 3 and 4 and as urban extensions rounding off the existing urban area in sustainable locations which can be integrated with existing infrastructure and services in a newly defined Settlement Area 4, to comply with public transport accessibility criteria. Employment growth could also be focused along transport orientated growth corridors.
444	No alternative Broad Spatial Option is suggested.
478	No alternative Broad Spatial Option is suggested.

531	Look at major roads/rail/shipping corridors to offer industry good connections for development.
630	Disagree with urban expansion into areas currently designated as Green Belt, which should be protected at all costs. Development should be very carefully considered, greenfield land should remain undeveloped as a buffer zone. A karting track was given planning permission despite being in Green Belt and the noise effect on residents was not taken into consideration. Eastham Village should be classed as rural due to it being an ancient village mentioned in the Domesday Book. Cottages fronting on the pavement and narrow roads would be severely damaged by further heavy traffic, particularly heavy lorries gaining access to the Ship Canal. Housing should not be confined to smaller areas, should include a wider scope.
654	A hybrid between Broad Spatial Option 2 and 3 is considered a more realistic and more equal distribution of growth as Broad Spatial Option 1 will not deliver housing in other areas where there is evidence of need.
710	No alternative Broad Spatial Option is suggested.
721	No alternative Broad Spatial Option is suggested.
813	Most of the local industrial and commercial sites are already fully used. Careful expansion would help the local economy and provide local jobs. There is a need to consider "non traditional" economic activities as it is unlikely that the economy will ever return to large factory sites and retailing does not provide "high value" jobs. There appears to be no strategy to develop "business enablers", such as "wireless-town" type initiatives to make Wirral more attractive to business and to train the population for new types of jobs. Whilst inappropriate development in the Green Belt cannot be supported, the lack of any strategy for this area, other than an inappropriate "Golf Resort", is an omission given the interest in allotments, food miles, food security, "bio-fuels", the need to reduce traffic and promote exercise. The Council appears to be acting inconsistently with regard to tourism, through the Strategic Asset Review, the out-sourcing of parks and open spaces and the closure of public toilets.
868	Broad Spatial Options 2 and 3 should be considered further in terms of the provision of housing opportunities outside the regeneration priority areas.
898	No alternative Broad Spatial Option is suggested.
940	Broad Spatial Option 1 should be modified to exclude the tourism proposals for Settlement Area 6.
993	A combination of Broad Spatial Option 1 and Broad Spatial Option 3.
1040	No alternative Broad Spatial Option is suggested.

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OD21	All three Broad Spatial Options focus mainly on east Wirral, with more housing requirements than employment options. More employment areas are needed in the west.
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**6.14** The Council has responded to these comments by amending the assessment of likely implications contained within the Core Strategy Preferred Options Assessment Report and by amending the Preferred Broad Spatial Strategy in the Preferred Options Report<sup>(10)</sup>.

## 7 Other Policy Options

### General Issues

**7.1** The following general comments were received on the analysis of the Policy Options:

ID	Summary of Responses Received
650	The discussion of Policy Options against Settlement Areas could be revisited, as it generates a lot of repetition.
1118	The sections on the implications of each of the "policy options" are excellent but some are not as detailed as others. The analysis related to the implications of the Broad Spatial Options appear to be the wrong way round and should provide an assessment of the implications of the policy options on the Broad Spatial Options rather than the implications of the Broad Spatial Options for each of the policy options. The layout could also be improved to clearly indicate each of the Options proposed (e.g. in a coloured box) as well as any preferred option (e.g. in another coloured box titled 'the Council's Current Assessment'). It is sometimes difficult to identify where one option ends and another begins (e.g. Policy Option CR1 and Policy Option CR2).

**7.2** The Council has responded to this comment by amending the assessment and by providing the assessment in a separate Assessment Report.

### Housing Land Supply

**7.3** Comments on housing land supply were mainly directed towards:

- the clarity of the data presented
- ensuring compliance with national guidance
- clarity over the role of the Growth Point

**7.4** A summary of each of the comments received is set out in the table below:

10 Preferred Option 4 - Broad Spatial Strategy refers

ID	Summary of Responses Received
105	The commentary appears to assume that Growth Point housing requirements must be provided rather than be tested to see if they are realistic and achievable.
146	It is not clear why Wirral is included alongside Liverpool, Knowsley and Sefton in the Northern Housing Market Area and the benefit or disadvantage this offers.
556	The Spatial Objectives, Broad Spatial Options and Policy Options will need to be carefully tied together, supported by the evidence base, in the next stages.
557	Welcome recognition that Wirral is part of the Northern Housing Market Area.
777	The presentation must set out clear requirements in terms of need, the role of existing commitments, the additional figure the Plan will need to provide and how this will be met over the Plan period. It is not clear how many dwellings need to be planned for over the Plan period. The Growth Point figure only applies between 2008/09 to 2016/17. The background to and use of the demolition rate is not clear. Trajectories for housing and previously developed land need to be included to explain how the Council will manage the supply coming forward, with reference phasing and to explain how the RSS brownfield target will be met.
778	Paragraph 6.23 should follow the advice in paragraphs 58 and 59 of PPS3 in relation to using sites with planning permission and windfalls in supply.
783	The mix of housing and appropriate densities should also be included.

**7.5** The Council has responded to these comments by:

- clarifying the land supply data to reflect the findings of the Strategic Housing Land Availability Assessment
- not including an allowance for windfalls in the supply
- using a demolition rate based on planned demolitions and past trends
- identifying additional Policy Options for the scale of new housing development to respond to the revocation of the Regional Spatial Strategy
- identifying the intention to provide 80 per cent of new housing development on previously developed land

## Spatial Distribution of New Housing Development

**7.6** The responses to Consultation Question 9 - *Is this a fair assessment of the available Policy Options for the spatial distribution of new housing development? Please give the reasons for your answer. Do you agree with the Council's conclusion*

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*that Policy Option HD1 is most likely to be the preferred option for the distribution of new housing? If not, please indicate which Policy Option you would prefer and explain the reasons for your preference - were mainly directed towards:*

- the impact on sustainability, biodiversity and green infrastructure
- the balance between restriction, flexibility and delivery
- the need to create a more balanced housing market
- the impact of reduced public funding
- the second hand property market and the existing number of empty properties
- the ability to deliver regeneration
- the need to attract inward investment and a highly skilled workforce
- the need for Green Belt release to meet existing and future requirements
- the significance of Wirral Waters

**7.7** A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
29	Agree this is a fair assessment. Policy Option HD1 should be preferred but landowners and developers may prefer to keep their money until they can spend it in the wider area envisaged by Policy Option HD2. Policy Option HD3 and Policy Option HD4 should not be considered.
60	Policy Option HD1 should not be preferred. Policy Option HD2 would better meet the needs of the population and make the Wirral a better place to live. This is the only way to meet the objectives of Policy Option HD1, which could not be met in any other way.
76	Agree this is a fair assessment. Policy Option HD1 should be preferred. The Council's Interim Planning Policy for New Housing Development has led to nearly every vacant site in New Brighton being granted planning permission for high density flats and to fewer larger family houses. A saturation point has been reached.
108	Wirral Waters should be identified as a strategic site or location, due to its scale and importance in relation to delivery of the Spatial Vision and Spatial Objectives.
126	Agree this is a fair assessment. Policy Option HD1 should be preferred.
147	It is hard to see where extra land for housing can be found in Settlement Area 6 other than through in-fill or encroachment upon Green Belt, both of which are unattractive.
158	Agree this is a fair assessment. Policy Option HD1 should be preferred as the most sustainable and deliverable option.
180	Agree this is a fair assessment. Policy Option HD1 should be preferred.



196	Agree this is a fair assessment. Policy Option HD1 should be preferred.
197	Agree this is a fair assessment. Policy Option HD1 should be preferred.
241	Agree this is a fair assessment but Policy Option HD1 should not be preferred. Policy Option HD2 would be preferable for green infrastructure, meeting Spatial Objective 8 and possibly Spatial Objective 9. Adjusting the number split between areas (e.g. 500:100), could give a greater emphasis to Broad Spatial Option 1. Policy Option HD1 would not meet Spatial Objectives 8 and 9. The influence of Wirral Waters may, however, constrain the delivery of alternative policy options but could lead to a saturated market which would deter development elsewhere.
270	Policy Option HD1 should not be preferred. Policy Option HD3 should be preferred. Current policies have resulted in a large decline in completions since 1998/99, forcing building into North Wales leading to a decline in Council Tax yield; increase in Council Tax benefits; reductions in GVA/head; decline of middle and high income 35-49 year olds associated with out-migration; lower job density and VAT registrations. Policy Option HD3 would reverse decline by focusing housing development into areas that attract higher incomes and skills; reducing further economic leakage, which could pay for socio-economic policies; focusing development in Settlement Areas 4, 5, 6 and 7 which are already significant economic assets; increasing GVA/head; providing higher quality housing for entrepreneurs, investors and senior manager who will start new businesses and create employment; attracting investment; increasing employment in the building trade and associated companies; reducing house prices through market forces; and assisting social inclusion by being able to deliver 40% affordable housing.
277	Agree this is a fair assessment. Policy Option HD1 should be preferred.
306	Policy Option HD1 should not be preferred. Policy Option HD2 would be the most consistent with Broad Spatial Option 2A, which would focus housing growth into the RSS Outer Area to the east of the M53 Motorway.
355	Agree this is a fair assessment. Policy Option HD1 should be preferred to prevent changing the Green Belt; harm to the fragile rural environment; undermining local distinctiveness and separate settlement identities.
377	Policy Option HD1 should not be preferred. Policy Option HD3 or Policy Option HD4 should be preferred to allow housing to be developed in the Growth Point, the RSS Outer Area and the RSS Rural Area. Policy Option HD1 would be too restrictive, is contrary to national policy which seeks a mix of housing, to support a wide variety of households in all areas, both urban and rural and could lead to shortfalls in the delivery of dwellings. Policy Option HD2 has similar issues. Policy Option HD1 and Policy Option HD2 are too heavily reliant on previously developed sites. RSS only requires "at least 80%" of the requirement to be met on previously developed land. The

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	<p>Growth Point increases the RSS requirement by 20%. Policy Options HD3 and HD4 would still retain a focus on urban regeneration. RSS targets can be exceeded. RSS is the subject to review. Information from NHPAU indicates that housing needs will exceed the current RSS by up to 26%. The latest Household Projections show a further increase. The potential annual requirement for Wirral may therefore be up to 672 dwellings. Only Policy Option HD3 and Policy Option HD4 will provide the flexibility to address these potential future needs and the shortfall against RSS to date.</p>
390	<p>Agree this is a fair assessment. Policy Option HD1 should be preferred but it is important that older housing in other areas of Wirral is brought up to an appropriate standard as well.</p>
423	<p>Policy Option HD1 should not be preferred. A balance between Policy Option HD2 and Policy Option HD4 would be more appropriate, to allow for urban expansion, extend development into the RSS Outer Area, reduce reliance on delivery within Wirral Waters and the Pathfinder and allow development in other, more deliverable, sustainable locations.</p>
445	<p>Policy Option HD1 should be preferred but Leasowe should also be included as a Growth Point. Policy Option HD2 should be retained as a fallback.</p>
464	<p>Policy Option HD1 should not be preferred. Restricting development to the Mersey Heartlands Growth Point would fail to provide an appropriate choice of housing location. Policy Options HD2 and HD3 would be preferred.</p>
479	<p>Policy Option HD1 should not be preferred. Policy Option HD3 is preferred, including all the Borough as there is vacant land in the west as well as the east but encroaching on the Green Belt is not supported.</p>
511	<p>Policy Option HD1 should be preferred but without a blanket restriction on other sustainable sites outside Newheartlands which could undermine the ability to meet local market and affordable housing needs. Policy Options HD2 and HD3 would allow for appropriate schemes in sustainable locations to meet wider regeneration and other local needs.</p>
533	<p>It is not the number of dwellings but the quality of life for inhabitants that should be the main issue. Building future slums will lead to vandalism and social problems.</p>
553	<p>Policy Option HD1 should not be preferred as it is not clear how this would deliver housing market restructuring and expand the quality and choice of housing in the outer areas in line with RSS Policy LCR3. Policy Option HD2 would appear to provide greater support for the policy focus in RSS, providing there are no negative impacts on housing market renewal in line with RSS Policies L3 and L4. It is not clear that Policy Option HD3 would support regeneration and the secondary focus on market restructuring in the outer areas in line with Policy LCR3. Policy Option HD4 is unlikely to support the policy focus in RSS Policies LCR2 and LCR3.</p>

575	Policy Option HD1 should not be preferred. Policy Option HD4 provides the flexibility needed to secure delivery but amended to include a primary onus on the regeneration areas first, followed by development in other areas, if a 5 year housing land supply could not be successfully demonstrated.
610	Policy Option HD1 should be preferred but older properties in all built up areas should be updated if at all possible.
631	Policy Option HD1 should not be preferred but new development in Eastham Village should be vigorously opposed to protect the appearance of the ancient village. Otherwise, support development in a wider range of Settlement Areas under Policy Options HD3 and HD4.
666	Policy Option HD1 should not be preferred. Policy Option HD3 is supported to allow a wider distribution of new housing development.
680	Policy Option HD1 is only preferable if new housing is properly planned to avoid cramped dwellings with no private gardens or green space, with plenty of parking, proper provision of schools, shops and transport as well as access to employment, a pleasant environment and leisure facilities. The Wirral Waters dockside is entirely unsuitable for families with children.
711	Agree this is a fair assessment. Policy Option HD1 should be preferred.
723	Don't know whether this a fair assessment but Policy Option HD1 is preferred.
740	Policy Option HD1 should not be preferred. Some of the older social housing in urban areas outside Newheartlands also need intervention to secure the continued sustainability of Wirral as a whole. Policy Option HD2 is preferred.
750	Policy Option HD1 should not be preferred. Support sensible development of vacant non-Green Belt land across the existing urban areas, not just in east Wirral, to re-develop derelict, outdated or poorly built properties. Sensible discretion that does not stifle regeneration is needed.
758	Policy Option HD1 should not be preferred. Building workers are having to find work in other areas with an adverse effect on the Wirral economy. This is also affecting architects, quantity surveyors, surveyors, lawyers etc.
779	Policy Option HD1 should not be preferred. Policy Option HD1 is not realistic. It is not clear how the Growth Point links with the main spatial strategy and feasibility and delivery needs to be more clearly addressed. Figures for the factors mentioned in paragraph 6.35 need to be presented for the whole of the plan period.
780	Build rates at Wirral Waters will be important. The Growth Point only increases housing to 2017. References to the Growth Point as a geographical area can also sometimes cause confusion.

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814	Agree that Policy Option HD1 best supports the preferred Broad Spatial Option 1 but could result in new housing being developed where a high percentage of houses are already for sale. The realities of the second hand housing market need to be addressed. It is unclear how the thousands of flats already built and to be built in Liverpool will be considered across the Northern Housing Market Area.
841	Agree this is a fair assessment. Biodiversity needs to be specifically considered but Policy Option HD1 is likely to be least harmful. . Picture 6.3 is too small and includes some valuable wildlife sites that should have been screened against other considerations before publication.
869	Policy Option HD1 should not be preferred as it provides too limited a focus and would not provide for the varying market needs across the Borough as a whole. Policy Option HD3 would provide a wider scope for development and regeneration outside the key priority areas.
901	Agree this is a fair assessment. Policy Options HD1 to HD4 are fair reflections of the available options but Policy Option HD1 should not be preferred. Policy Option HD3 and Policy Option HD4 are preferred, subject to the inclusion of Settlement Area 8. The 80% RSS target would allow for the development of up to 1800 dwellings on greenfield sites. That only 1,548 dwellings have been built since the Council's Interim Planning Policy for New Housing Development was adopted indicates that a restrictive approach is wrong. The Growth Point increases provision to 600 dwellings per annum. RS2010 could increase this further to 690 per annum. The identified supply must be deliverable. Current build rates show that the Council is not able to deliver a five year supply against these targets. The current supply is dependent on applicants renewing existing planning permissions. The capacity of sites where planning permission has lapsed has not yet been assessed. There is too great a reliance on windfall sites. The Council should now consider suitable sites wherever they are located. Policy Option HD1 is even more restrictive than the existing Interim Planning Policy and would fail to deliver the rural renaissance expected by PPS4, the Taylor Review and the Stuart Burgess Rural Advocates Study. A fifteen year supply cannot be met on the basis of the figures currently published. The total available provision is less than the minimum targets in RSS and the expected targets for RS2010. Delivery would be dependant on achieving build rates that have not been achieved since the early 1980s, on questionable brownfield sites in the Growth Point and Newheartlands. Policy Option HD2 is effectively a continuation of the Interim Planning Policy and would suffer from the same deficiencies as Policy Option HD1. It would only provide for local needs housing to be provided for within the RSS Rural Area on a 'case by case' basis. Allowing residential development throughout Settlement Areas 1 to 8 would provide the population necessary to sustain local jobs, infrastructure and services; create self-sustaining communities that can support both their young and ageing population; and promote diversification in the rural

	settlements of Raby, Thornton Hough, Brimstage, Storeton and Barnston; reducing the need to demolish, rebuild, convert or extend existing housing of significant character within the built-up urban areas to protect local heritage and prevent over-development, with less traffic, congestion, emissions and pollution. Providing homes in areas of demand would also limit out-migration, disperse new investment and economic activity, promoting opportunities for new and existing local services and help to address rural deprivation.
918	Policy Option HD1 should be preferred to focus development, make use of existing buildings and brownfield sites and support more sustainable patterns of transport and movement but should include a stronger requirement for maintaining, creating and enhancing open space and green infrastructure.
994	Policy Option HD1 should not be preferred. Policy Option HD4 or a variant of it is the only way of achieving and meeting the necessary need for growth.
1041	Agree this is a fair assessment. Policy Option HD1 should be preferred.
1120	Agree this is a fair assessment. Policy Option HD1 should be preferred.
1128	Choosing a housing option is dependent on the results of the SHLAA. It is not clear whether Growth Point requirements will be met in one specific area or whether Growth Point requirements will simply be considered as an uplift on RSS figures to be delivered anywhere in the Borough and the relationship with Liverpool. There should be a clear explanation of the relationship with the Newheartlands Pathfinder. Paragraph 6.24 should read "30 dwellings per hectare".

**7.8** The Council has responded to these comments by amending the Assessment Report and by revising the Preferred Option in the Preferred Options Report<sup>(11)</sup>.

## Phasing New Housing Development

**7.9** The responses to Consultation Question 10 - *Is this a fair assessment of the available Policy Options for the phasing of new housing development? Please give the reasons for your answer. Do you agree with the Council's conclusion that Policy Option HP2 is most likely to be the preferred option for phasing new housing? If not, please indicate which Policy Option you would prefer and explain the reasons for your preference* - were mainly directed towards:

- the need for a simple approach
- the need to support development in areas of greatest need
- the impact on green space in areas where brownfield land is scarce
- the effect on Settlement Area 8
- the need to reduce the need to travel to work

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**7.10** A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
30	Agree this is a fair assessment but Policy Option HP2 should not be preferred as this would allow developers to "play off" types of land within one Settlement Area against land within another; I do not believe that sufficiently strong controls could be implemented; it would be seen as "one rule for the rich and another for the poor"; and would be too confusing. Policy Option HP1 should be preferred.
47	The approach should be realistic. Development with planning permission is now very unlikely to take place in the priority areas over the next few years as sites have simply become unviable. Development is, therefore, likely to be very slow in less prosperous areas. The call-for-sites has identified a number of vacant sites capable of immediate development which will increase employment for building workers, architects, surveyors, quantity surveyors etc; stop the decline in residential population by allowing people to live where they want to rather than moving to Cheshire and North Wales etc; help to keep prices lower; attract executives moving into the area to start up new businesses; remove expensive old fashioned properties which are a dis-incentive for growth; allow the children of residents in mid and west Wirral to remain within their local districts; provide more sheltered housing to release larger properties for family occupation; remove empty or boarded up shop units to provide a better environment; increase Council revenue through planning application fees, section 106 agreements, Council Tax receipts and higher use of paid services. A negative attitude towards residential development is a poor economic use of land, has detrimental effects on employment and housing stock, will lead to further decline and will not help to create a carbon-neutral or sustainable society.
64	Policy Option HP2 should not be preferred as there is also a need for new development at all price levels in west Wirral, to avoid population decline and increase revenue. Private housing in regeneration areas in east Wirral is generally unpopular for owner occupation and is only suitable for rental investments. Funding for shared ownership is very limited. Policy Option HP3 should be preferred.
77	Agree that Policy Option HP2 could reduce income deprivation by focusing new housing in areas of economic growth.
127	Agree this is a fair assessment but Policy Option HP2 should not be preferred. Policy Option HP1 is preferred.
148	It is hard to see where extra land for housing can be found in Settlement Area 6 other than through in-fill or encroachment upon Green Belt, both of which are unattractive.

159	Agree this is a fair assessment. Agree Policy Option HP2 should be preferred. Opposition is, however, likely from west Wirral.
168	The Pictures show how very little green space is left on Wirral. The relentless process of building on every piece of open land using the same materials we have been using for a millennium is not sustainable and needs to be stopped. Industry sources confirm cement-making as one of the biggest producers of greenhouse gases. Even "low-energy" buildings use man-made, energy hungry materials. There is a need for new thinking about housing.
181	Policy Option HP2 should not be preferred. It is difficult to differentiate between Policy Option HP1 and HP2 but Policy Option HP1 would give slightly better protection to the green environment.
243	Agree Policy Option HP2 should be preferred as this would better meet Spatial Objective 8 and possibly Spatial Objective 9. Adjusting the number split e.g. 500:100, would give a greater emphasis to Broad Spatial Option 1. Policy Option HD1 would be unlikely to meet these Spatial Objectives.
278	Policy Option HP2 should not be preferred as new housing should follow new employment developments to reduce travel to work and prevent additional traffic congestion.
279	Agree Policy Option HP2 should be preferred. The Council's current restrictions are leading to the poor use of land, reduced employment and further social and economic decline.
329	A Flood Risk Sequential Test and a Water Cycle Study should be used to influence the phasing options for new development.
356	Policy Option HP2 has clear advantages by providing specific targets on a settlement by settlement basis but would be difficult to implement in Settlement Area 8, given the need to identify the specific impacts on individual villages.
391	Agree this is a fair assessment. Agree Policy Option HP2 should be preferred.
424	Agree Policy Option HP2 should be preferred as this would support urban expansion.
446	Policy Option HP2 should not be preferred. Policy Option HP1 would allow urban brownfield land to be used right across the Borough before using urban greenfield land in the east, where open space is already lacking.
465	Policy Option HP2 should not be preferred. An appropriate policy is already in place in RSS Policy DP4 and a sequential approach that would apply to individual Settlement Areas would be unnecessary.

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482	Agree this is a fair assessment but under no circumstances should any building be done on Green Belt or playing fields.
513	It is difficult to conclude which would be preferable in the absence of figures for each Settlement Area, although phasing by Settlement Area would seem too detailed for a Core Strategy. Phasing by RSS Area may be more appropriate.
534	Limiting development to one area will lead to gated communities and social apartheid.
554	A sequential approach is already set out in RSS Policy DP4.
632	Policy Option HP1 should be preferred.
633	Policy Option HP1 should be preferred.
681	Agree Policy Option HP2 should be preferred.
712	Agree this is a fair assessment but Policy Option HP2 should not be preferred. Policy Option HP1 would better focus development to areas of greatest need and help maintain the character of other areas.
741	Agree Policy Option HP2 should be preferred.
781	Policy Option HP2 is over-complicated and would be difficult to implement. It is not clear how this would deal with development which straddles Settlement Areas or with delivery issues. Some brownfield sites may only be able to come forward later on. The Allocations DPD can also be used to phase housing development.
815	Agree this is a fair assessment. Agree Policy Option HP2 should be preferred.
870	Agree Policy Option HP2 should be preferred, subject to flexibility to look elsewhere when suitable sites are presented that will achieve a number of the Spatial Objectives.
875	The development of garden areas and increased densities should be dealt with under the Order of Preference.
903	Agree Policy Option HP2 should be preferred as this will support development within the rural areas. Policy Option HP1 or Policy Option HP2A are likely to be the least flexible options.
919	Strongly oppose any Policy Option that would result in the loss of valuable urban greenspace, which is already limited within the urban areas. Additional housing will only compound this pressure if new greenspace is not provided. Development on greenfield land in any part of the Borough should be a last resort. Development is supported on brownfield sites subject to measures to protect any biodiversity value.



941	Agree this is a fair assessment. Agree Policy Option HP2 should be preferred.
995	Agree Policy Option HP2 should be preferred.
1129	The Policy Options appear reasonable but will need to be closely related to the proposed spatial distribution of new housing development and the findings of the SHLAA.

**7.11** The Council has responded to these comments by amending the Preferred Option in the Preferred Options Report<sup>(12)</sup>.

### Order of Preference

**7.12** The responses to Consultation Question 11 - *Please place the following categories of land in order of priority for new housing development with "1" being the highest preference and "9" being lowest preference* - were mainly directed towards:

- the use of previously developed brownfield land before previously undeveloped greenfield land
- the use of rural brownfield before urban greenfield land
- the need to protect the biodiversity value of some brownfield sites

**7.13** Other additional preferences suggested included:

ID	Other (a)	Other (b)	Other (c)
171	Existing suburban land such as blocks of large rear gardens	Vacant suburban land	
280	Stop the sequence after "Rural brownfield - west Wirral"		
425	Reflect the boundaries identified in RSS rather than Settlement Area boundaries which are not consistent with RSS.		
904	Rural brownfield - Central Wirral before Rural Brownfield - East Wirral	Rural Greenfield - Central Wirral before Rural Greenfield - East Wirral	Urban Greenfield - Central Wirral before Urban Greenfield - East Wirral

**7.14** A summary of the sequence of preferences expressed is set out overleaf:

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ID	Urban brownfield - in regeneration priority areas only	Urban brownfield - in rest of east Wirral	Urban brownfield - west Wirral	Rural brownfield - east Wirral	Rural brownfield - west Wirral	Urban greenfield - east Wirral	Urban greenfield - west Wirral	Rural greenfield - east Wirral	Rural greenfield - west Wirral
31	1	2	3	4	5	6	7	8	9
49	1	2	3	4	5	6	7	8 & 9	
65	1	2	3	4	5	6	7	8	9
78	1	3	2	7	6	5	4	9	8
92	3	1	2	4	5				
128	1	2	3	4	6	5 & 7	9	8	
160	1	2	3	4	5	6	7	8	9
169	1	2	3	4	5	6	7	8	9
171		3							
182	1	2	4	3	5	6	7	8	9
280	1	2	3	4	5				
282	3	1	2	4	5	6	7	8	9
357	1	2	3	4	5	6	7	8	9
392	1	2	4	3	5	9	8	6	7
425	1	2				3			
447	1	2	3	4	5	6	7	8	9
484	1	2	3	4	5				
535	1	2	4	3	5	6	7	8	9
577	1	2	2	3	3	4	4	5	6
634	2	1	3	5	4	6	7	9	8
713	1	2	3	4	5	6	7	8	9
725	1	2	3	4	5	9	9	9	9
743	1	2	3	4	5	6	7	8	9
803						9	9	9	9
842	1	3	2	5	4	7	6	9	8
872	1	2	3	4	5	6	7	8	9
904	1	2	8	3	4	7	9	5	6

ID	Urban brownfield - in regeneration priority areas only	Urban brownfield - in rest of east Wirral	Urban brownfield - west Wirral	Rural brownfield - east Wirral	Rural brownfield - west Wirral	Urban greenfield - east Wirral	Urban greenfield - west Wirral	Rural greenfield - east Wirral	Rural greenfield - west Wirral
942	1	2	3	4	5	6	7	8	9
996	3	1	2	5	4	7	6	9	8
1043	1	2	4	3	5	6	7	8	9
1075	3	1	2		4	5 & 7	6	9	8

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**7.15** The following general comments were also received:

ID	Summary of Responses Received
31	Egerton Dock and Morpeth Dock could be filled with inert waste and released to developers.
244	The range of choice is limited and is not particularly helpful. A choice based on land use type would be better than a crude brownfield /greenfield split. Some brownfield sites are UK Priority Habitats and a simple brownfield category would not on its own focus development and regeneration effectively.
682	Bromborough and Eastham is currently subject to a one-for-one policy which has been very helpful.
818	Land in the Green Belt should be in a separate category of its own as it is not clear whether it is included under the other categories. Green Belt land should always be the last resort.
971	It is not clear what role the re-use or conversion of buildings for residential use or a reduction in vacancy rates has to play in providing for housing.
OD23	Infill sites in the Green Belt should be considered before releasing large fields. Derelict sites should be enhanced first.
OD24	Development in private gardens should be discouraged. It is commonplace in areas such as Oxton, Heswall and West Kirby and spoils the character of these areas.

**7.16** The Council has responded to these comments by amending the order of preference in the Preferred Options Report<sup>(13)</sup>.

## Affordable and Specialist Housing

**7.17** The responses to Consultation Question 12 - *Is this a fair assessment of the available Policy Options for the delivery of affordable and specialist housing within the Borough? Please give the reasons for your answer. Do you agree with the Council's conclusion that Policy Option AH1 is most likely to be the preferred option for the delivery of affordable and specialist housing? If not, please indicate which Policy Option you would prefer and explain the reasons for your preference - were mainly directed towards:*

- the need for a simple, fair and consistent approach
- the need to take account of local needs

13 Preferred Option 8 - Order of Preference refers

- the need to take account of local viability
- the additional need for specialist housing

**7.18** A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
32	Agree this is a fair assessment. Agree Policy Option AH1 should be preferred.
79	Agree Policy Option AH1 should be preferred as the Council could then assess local needs but additional controls would be needed to protect local distinctiveness and green infrastructure within New Brighton.
129	Agree this is a fair assessment. Agree Policy Option AH1 should be preferred.
172	More bungalows are needed for the ageing population who wish to remain in their familiar local area in low-cost, low-maintenance homes near their immediate families.
183	Agree Policy Option AH1 should be preferred.
198	Agree this is a fair assessment. Agree Policy Option AH1 should be preferred.
200	Agree this is a fair assessment. Agree Policy Option AH1 should be preferred.
245	Agree Policy Option AH1 should be preferred as focusing new build affordable housing only in the densely populated and generally more deprived areas is not consistent with the sustainable communities and would segregate neighbourhoods rather than mixing them.
281	Policy Option AH1 should not be preferred as Policy Option AH2 would target affordable housing nearest to employment opportunities to allow walking and cycling to work.
285	Agree this is a fair assessment. Agree Policy Option AH1 should be preferred.
358	Agree Policy Option AH1 should be preferred but implementation must be subject to the full rigours of planning law and specific local issues conditions and concerns.
405	It should be possible to be more innovative about the type of materials used in providing more affordable homes rather than just using brick (cf John Prescott's £60,000 home)

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413	Policy Option AH1 should not be preferred given the stark contrast between different areas of Wirral. An up-to-date evidence base will be required, including a study of economic viability in conjunction with the forthcoming sub-regional Overview Study.
426	Policy Option AH1 should not be preferred because Policy Option AH2 would allow affordable housing to be directed to Settlement Areas with the greatest needs.
448	Agree this is a fair assessment. Agree Policy Option AH1 should be preferred.
486	Policy Option AH1 should not be preferred as people in west Wirral also need affordable housing and have as much right to choose where they want to live as those in the east. Few people will choose to live in skyscraper blocks like those planned for Wirral Waters, shown by their demolition in Moreton and Leasowe.
514	Policy Option AH1 should not be preferred as there should be different requirements for the RSS Inner, Outer and Rural areas to reflect their differing needs and differences in financial viability. A 'ramped' approach over time would be consistent with the position at Wirral Waters.
536	All housing must be affordable but realistic for quality of life. 1940's pre-fab units were small but good quality unlike some of the current flats being allowed at present.
555	National policy allows the setting of differential targets across the Borough.
578	Agree Policy Option AH1 should be preferred as it provides greater certainty and consistency.
636	Agree Policy Option AH1 should be preferred.
683	Policy Option AH1 may mean a fairer distribution of provision but it should not be assumed that any land can be used. The usual constraints must apply and the careful design of such facilities is very important. Policy Option AH2 may, however, be preferable, given the limited resources which may be available.
714	Agree this is a fair assessment. Agree Policy Option AH1 should be preferred.
744	Agree Policy Option AH1 should be preferred.
782	The revised needs assessment and viability study will be key. There is a need to take account of the requirements of PPS3 paragraph 29. RSLs must be content with the policy when drafted. Any policy must include: an overall

	target; the range of circumstances when it will be required; minimum site thresholds; the approach to contributions; the likely levels of funding available for affordable housing.
819	Policy Option AH1 should not be preferred as a Borough-wide target could be met by a single large development and Settlement Area targets would better meet local needs.
873	Policy Option AH1 should not be preferred as Policy Option AH2 will take better account of local needs and set targets for geographically specific areas, where evidence shows specific local need.
907	Policy Option AH1 should not be preferred to enable all areas of deprivation to be addressed, including within Settlement Area 8, which could be supported as 'appropriate development' in the Green Belt under PPG2. No specific target is recommended for specialist housing despite a recognised need in Thornton Hough.
943	Agree this is a fair assessment. Agree Policy Option AH1 should be preferred.
997	Agree Policy Option AH1 should be preferred.
1044	Agree this is a fair assessment. Agree Policy Option AH1 should be preferred.

**7.19** The Council has responded to these comments by not revising the Preferred Option in the Preferred Options Report<sup>(14)</sup>.

## Gypsies and Travellers

**7.20** The responses to Consultation Question 13 - *Is this a fair assessment of the available Policy Options for the approach to providing specialist accommodation for Gypsies and Travellers within the Borough? Please give the reasons for your answer. Do you agree with the Council's conclusion that Policy Option GT2 is most likely to be the preferred option for providing for Gypsies and Travellers? If not, please indicate which Policy Option you would prefer and explain the reasons for your preference* - were mainly directed towards:

- the absence of need
- the need for further consultation and research
- the need for flexibility
- the need for consistency with the Regional Spatial Strategy

**7.21** A summary of each of the comments received is set out in the table below:

14 Preferred Option 9 - Affordable and Specialist Housing refers

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ID	Summary of Responses Received
33	Disagree that the assessment is fair. No "fair assessment" is possible until research is carried out but public money should not be spent unless there is an identified need. Agree Policy Option GT2 should be preferred.
80	Agree Policy Option GT2 should be preferred. Every available vacant site that would be large enough for this type of accommodation in New Brighton has already been granted planning permission for private housing.
130	Agree this is a fair assessment.
184	Agree this is a fair assessment. Agree Policy Option GT2 should be preferred.
199	Agree this is a fair assessment. Agree Policy Option GT2 should be preferred.
201	Agree this is a fair assessment. Agree Policy Option GT2 should be preferred.
283	Agree this is a fair assessment. Agree Policy Option GT2 should be preferred.
287	Agree Policy Option GT2 should be preferred.
330	Development may be inappropriate in Flood Zones 2 and 3. A sequential test will need to be applied to ensure that sites with the lowest risk of flooding are identified.
359	Mainly agree but this needs to be dealt with on a case by case basis, subject to the full rigours of planning controls and the law both planning and otherwise.
393	Disagree that this is a fair assessment. Policy Option GT2 should not be preferred. Evidence for a lack of demand is not robust. The fact that no gypsies and travellers have come in recent years when no good provision has been made is not evidence that they won't come if provision is made. There should be consultation with gypsies and travellers. If an appropriate site was proposed and not used, it could be made available to tourists.
449	Agree this is a fair assessment. Agree Policy Option GT2 should be preferred as this will be site specific and will allow for more flexibility in assessing need.
489	Agree Policy Option GT2 should be preferred, as unaware of much demand in the area and they should not be encouraged.
537	Gypsies and travellers should keep moving on and sites should only be provided for transit facilities.



684	Agree that Policy Option GT2 might be preferable.
715	Agree this is a fair assessment. Agree Policy Option GT2 should be preferred as this gives the most flexibility and gives the wishes and needs of travelling and resident population more consideration.
745	Broadly agree that Policy Option GT2 should be preferred.
784	The number of pitches should be referred to, if the RSS is finalised during the preparation of the Core Strategy.
920	Agree Policy Option GT2 should be preferred subject to the criteria including all relevant environmental concerns, such as impacts on habitats and biodiversity, landscape and local character.
944	Agree this is a fair assessment. Agree Policy Option GT2 should be preferred.
956	Agree this is a fair assessment. Agree Policy Option GT2 should be preferred.
998	Agree Policy Option GT2 should be preferred.
1042	Agree Policy Option GT2 should be preferred as the only realistic option in the absence of a proper evidence base. The criteria will need to be consistent with the regional approach in the RSS Partial Review.
1077	Agree Policy Option GT2 should be preferred.

**7.22** The Council has responded to these comments by not amending the Preferred Option in the Preferred Options Report<sup>(15)</sup>.

## Providing for Employment

**7.23** The responses to Consultation Question 14 - *Is this a fair assessment of the available Policy Options for the spatial pattern of new employment development? Please give the reasons for your answer. Do you agree with the Council's conclusion that Policy Option EL1 is most likely to be the preferred option for the pattern of future employment? If not, please indicate which Policy Option you would prefer and explain the reasons for your preference* - were mainly directed towards:

- the need for greater choice and flexibility
- the need for employment nearer to people's homes
- the role of Wirral Waters
- the need for additional employment land
- the need for greenfield sites
- the need for sub-regional co-ordination

15 Preferred Option 10 - Gypsies and Travellers refers

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**7.24** A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
34	Agree this is a fair assessment. Agree Policy Option EL1 should be preferred. Policy Option EL2 may help people with no car and no way to afford one to access a wider range of jobs but it is hard to see how any new jobs could be created without public funding, so Policy Option EL1 may be the only option.
81	New Brighton needs small and medium sized businesses to flourish and tourism related employment to be viable all year round but land for larger industrial use will not be available. The Council should, however, actively pursue the revitalisation of Liscard shopping centre. A change in parking charges would be appropriate to save independent shops, by making the first 2 hours free.
93	Agree Policy Option EL1 should be preferred as this would coincide with transport routes. Moving development outside this area would require additional, costly and damaging infrastructure. Greenfield development is not supported, especially as climate change takes effect.
131	Agree this is a fair assessment. Agree Policy Option EL1 should be preferred but there is a need to support the thriving maritime and port sector on the West Float and Cammell Lairds and allow land for their expansion. Wirral Waters should focus on real jobs and not transitory financial and office sectors which may not sustain the level of development proposed.
161	Agree this is a fair assessment but Policy Option EL1 and Policy Option EL2 are equally sustainable and could operate almost in tandem. Locations in other areas may also be better suited to certain types of new business such as IT or training functions, which may not benefit from locations in traditional urban areas.
185	Agree this is a fair assessment but Policy Option EL1 should not be preferred. Policy Option EL2 is more sensible and equitable and would channel investment towards local centres to maintain employment close to areas of need and help to reduce the need to travel, especially by car. Wider needs should not be dictated by the availability of public funding.
247	A blend of Policy Option EL1 and Policy Option EL2 is preferred to stop suitable sites being held back outside strategic locations, especially if land supply constraints limit the number of sites that could be developed. Policy Option EL3 is only justified if there is compelling evidence that no strategic brownfield sites of suitable size are still available.
284	Agree this is a fair assessment. Agree Policy Option EL1 should be preferred.

295	Agree Policy Option EL1 should be preferred. Moving development outside the employment areas on Picture 6.4 would require additional infrastructure, which would add to the cost of increasing employment. Greenfield sites should not be considered.
315	Adequate provision is needed to secure a vibrant local and national economy in an uncertain environment. Flexibility is needed, including in the use of land allocated for employment or industrial or commercial uses, which could provide appropriate opportunities for community development, including places of worship.
360	Agree Policy Option EL1 should be preferred to maintain the focus on existing successful strategies to meet the need for extra jobs near the main areas of population.
414	The fit with the sub-regional RSS land target is unclear and the sub-regional Overview Study will need to be taken into account.
427	Policy Option EL1 should not be preferred. A mix of Policy Option EL2 and Policy Option EL3 should be considered and the need to identify a new long term strategic location outside the existing urban area should not be dismissed as Wirral Waters may not be able to provide for all forms of additional need. A transport orientated approach should be adopted in addition to existing employment sites and Strategic Regional Sites, to retain the spread of employment across the Borough and allow a greater provision of local employment to address local needs.
450	Agree Policy Option EL1 should be preferred as long as it allows for the protection of employment uses at Carr Lane Industrial Estate and encourages the replacement and refurbishment of older premises and the creation of more floor space. Employment in the west will reduce the length of journeys to work.
466	Policy Option EL1 should not be preferred. Development should not be precluded in existing employment areas in other parts of the Borough.
490	Policy Option EL1 should not be preferred as jobs need to be spread out like the housing, not huge factories but smaller workshops and craft centres which would fit with a tourism ethos.
515	Agree Policy Option EL1 should be preferred. A new strategic location outside the urban area is unnecessary and could undermine the delivery of Wirral Waters.
526	Policy Option EL1 and Policy Option EL2 would be generally in line with RSS but Policy Option EL3 would not fit with RSS.
538	The M53/ tunnel approach corridor should be the major focus for new employment. Sites along the Mersey bank should use river transport.

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637	Policy Option EL3 should be preferred.
685	Policy Option EL1 should not be preferred as it is too concentrated. Policy Option EL2 would provide employment opportunities for people nearer their homes, reducing travel time, expense and inconvenience. Policy Option EL3 is likely to be more costly and will have a significant environmental impact.
718	Agree this is a fair assessment but Policy Option EL2 should be preferred to promote a balanced growth in employment across the Borough as a whole and to address areas of need to the west of the M53 Motorway.
728	Agree this is a fair assessment. Agree Policy Option EL1 should be preferred.
785	Employment land figures should be discussed with 4NW to fit in with the wider figure for Merseyside contained within RSS. The relationship between 177ha and 302ha should be clarified. The percentage and numerical distribution of employment land and port development needs to be set out, informed by land distribution and availability, with key areas identified. Out-of-centre office development must accord with national policy in PPS4.
846	Policy Option EL1 or Policy Option EL2 should be preferred. Policy Option EL3 is likely to reduce biodiversity and/or the ability to produce food, increasingly important as oil prices rise and reducing our carbon footprint becomes more pressing.
861	Policy Option EL1 should not be preferred. The focus on Wirral Waters could lead to insufficient attention to secure investment in employment areas more convenient and accessible to communities. A more decentralised approach could reduce the need to travel, provide a higher level of employment across a wider area, provide further opportunities within local centres and offer additional benefits to other areas in need of employment in line with the aspirations of the Community Strategy.
874	Policy Option EL1 should not be preferred. A more flexible approach is needed, in line with Policy Option EL2, to take account of potential development opportunities elsewhere, not just in east Wirral, amended to include existing town centres. The expansion of existing employment areas should also be considered.
890	Strategic Sites should be focused on locations that are accessible by all forms of transport, with the expectation that developers will contribute to the cost of public transport access in areas that are not well served by existing services. Focusing new development on existing areas may also help the business case for improving transport links.

928	Policy Option EL1 should not be preferred. There is no long-term alternative to a brand new site outside the existing urban area. There is an acute shortage of unconstrained immediately available employment land; a general lack of high quality sites for offices or general industry outside of the Wirral International Business Park; and existing employment sites are highly dependent on grant aid. There is also a need to replace the Wirral International Business Park. Wirral Waters is dependent on the completion of new dwellings to deliver the necessary funding and the residential elements will occupy a large percentage of the available vacant land. Land between Woodchurch and Landican, within the national Assisted Area, would also be ideally located in relation to existing transport infrastructure.
945	Agree this is a fair assessment. Agree Policy Option EL1 should be preferred.
957	Policy Option EL1 would deny the potential for other small local developments in existing, well-used local business estates which could be expanded to provide more local jobs. There is no strategy for making Wirral more attractive to business people such as the provision of "Wireless Town" internet and to secure training for new jobs.
999	Policy Option EL1 should not be preferred. Policy Option EL2 would be a more balanced approach without reliance on a single area. Brownfield land in Settlement Areas 1, 2, 3 and 4 should be able to meet needs to 2030 but greenfield sites may also be needed to enable existing businesses to expand and grow and may outperform brownfield sites in terms of attracting sustainable economic inward investment. Wirral Waters will not meet all these needs.
1000	Agree Policy Option EL1 should be preferred but Policy Option EL2 could deliver the same outcome alongside a wider range of available sites while still supporting the completion of existing Strategic Sites and the continued focus on regeneration in line with RSS and the joint City Region response to RS2010. A commitment to appropriate sectoral priorities would also be welcomed.
1046	Agree Policy Option EL1 should be preferred.
1108	Policy Option EL1 should not be preferred. Significant employment growth at Wirral International Business Park cannot be seen as a credible response to climate change. The strategy needs to persuade people not to use cars and to use public transport. Running additional bus routes will not be a sufficient incentive. Generating employment close to where people live, instead of isolated employment areas would offer greater benefits; a richer work environment; and an increase in walking, cycling and health.
OD20	Policy Option EL1 should not be preferred as employment growth needs to be spread across the whole of Wirral not just east Wirral.

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**7.25** The Council has responded to these comments by amending the Preferred Option in the Preferred Options Report<sup>(16)</sup>.

## Providing for Retailing

**7.26** The responses to Consultation Question 15 - *Do you agree with the proposed hierarchy of retail centres set out in Table 6.14? Are there any other centres that you think should be included? Please explain the reasons for your response - were mainly directed towards:*

- the listed centres at Birkenhead; Hoylake; Liscard; and New Ferry
- the un-listed centres as Mill Park, Eastham; Eastham Village; Egremont; Greasby; Higher Bebington; Pensby; and Wallasey Village
- Wirral Waters
- more local convenience centres
- out-of-centre facilities

**7.27** A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
35	Hoylake should be added as a top location for spending in pubs and bars in under the third bullet point in paragraph 6.138 and Greasby should be listed as a Local Centre.
43	Generally agree with the proposed hierarchy but there is no recognition of the role of out-of-centre retail parks, such as Croft Retail Park and Junction 1 Retail Park at Bidston Moss, which will continue to provide shopping facilities for mainly bulky comparison goods for Wirral residents for which town, district and local centre locations are operationally unsuitable.
82	Agree with the proposed hierarchy but urge the Council not to develop too many leisure interests in other parts of the Borough to sustain the leisure attractions in New Brighton.
94	Disagree with the proposed hierarchy. West Kirby is a Local Centre that serves the outlying areas of Newton, Grange, Caldy and possibly Greasby and Frankby.
132	Agree with the proposed hierarchy. Welcome the statement that there is no need for additional convenience floorspace in any part of the Borough. A complex for comparison goods at Wirral Waters may undermine the remaining comparison shops in town centres and in out-of-town/edge-of-town retail parks as well as draw additional convenience stores into the Wirral Waters development.

162	Agree with the proposed hierarchy but this could be disrupted by investment at Wirral Waters which might result in businesses moving from Birkenhead Town Centre.
188	Agree with the proposed hierarchy but Liscard should be more than a Town Centre but below a Sub Regional Centre.
224	Disagree with the proposed hierarchy. The proposed re-classification should take into account the potential of declining centres to regenerate and accommodate new development to better serve local communities. Disagree that there is no capacity for additional convenience floorspace in any part of the Borough. The "over-trading" of out-of-centre stores may enable new facilities to be provided in existing town, district or local centres to improve sustainability and reduce the need for people to travel. The current hierarchy appears to abandon some centres, discouraging investment and development that may assist in their regeneration and enhancement.
248	Agree with the proposed hierarchy but Wirral Waters will have a significant impact on the likelihood of development elsewhere. If the district is already well-served by several types of retail activity, there is a risk that other existing centres will start to lose business and close once Wirral Waters reaches a critical mass, creating blight not growth, even if an outlet village like Cheshire Oaks is developed.
286	Agree with the proposed hierarchy but hope that the list of Local Centres is not in descending order of importance or Irby would need to be placed higher up the list.
296	Agree with the proposed hierarchy.
307	Agree with the proposed hierarchy. Supports the inclusion of Oxton Village as a Local Centre.
361	Agree with the proposed hierarchy but Greasby Village should be included as a Local Centre.
394	Egremont should be included as a Local Centre. Plans have been drawn up as part of Newheartlands. If Egremont is not included, the plans will be completely shelved.
416	Agree with the proposed hierarchy. Support the designation of Birkenhead. The reclassification will address existing poor performance and decline, whilst enhancing the status, function and catchment of the now higher order centres in terms of comparison retail.
451	Disagree with the proposed hierarchy. Glaring omissions from the list of Local Centres include Eastham, Greasby, Higher Bebington and Pensby.
491	Agree with the proposed hierarchy.

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529	The hierarchy appears to be in line with RSS Policy W5 and PPS4.
539	Disagree with the proposed hierarchy. Disagree with the inclusion of Borough Road (Prenton Park) as a Local Centre compared with Woodchurch Road, Prenton where there are more shops. Mill Park, Eastham Village and Upper Bebington Village should be added as Local Centres. Local Centres should be within walking distance for an ageing population.
612	Agree with the proposed hierarchy but Egremont should be included as a Local Centre. The shops have deteriorated badly but a plan to concentrate them has been put on hold because of shortage of money. This is still needed and will become more necessary as wider Housing Market Renewal takes place.
638	Disagree with the proposed hierarchy as more local convenience shopping should also be included.
693	Disagree with the proposed hierarchy. Mill Park, Eastham has a range of retail outlets, a One-Stop-Shop, Library, bank, Tesco and NHS Clinic. Bromborough Village now only offers a limited choice because of Croft Retail Park but still has a Civic Centre, Library, supermarket and other small shops. Public transport to Croft Retail Park is only an hourly service and is not available out of hours or on Sundays.
722	Agree with the proposed hierarchy.
730	Agree with the proposed hierarchy.
761	Woodchurch Road (Prenton) has declined over many years, with smaller shops squeezed out by high rentals, high business rates and the enforcement of unfair parking regulations on Woodchurch Road. More restrictions should be placed on service outlets such as hairdressers, estate agents and hot food takeaways.
948	Agree with the proposed hierarchy.
958	It is unclear whether the hierarchy has been based on relative or absolute size. For example, is Birkenhead still a Centre compared with the size of Liverpool One and its convenient rail links. Surely the impact of convenient shopping areas in Liverpool will have an impact on retail requirements in dormitory areas such as Birkenhead and Wirral. The impact of Wirral Waters on the adjacent centres at Birkenhead and Liscard is unclear. The "downgrading" of Hoylake could lead to its further decline with investment re-directed to other higher grade retail areas. The hierarchy will be undermined if the Council continues to allow key facilities to move to "out-of-town" areas further reducing local footfall. Eastham is missing.



1001	Disagree with the proposed hierarchy. There is no logic in designating Birkenhead as a Sub-Regional Centre, when it is only attractive to a limited catchment area.
1013	Disagree with the proposed hierarchy. The reclassification of Hoylake will have a negative and irreversible impact on future regeneration as any larger scale developments will now be directed to other higher order centres, further increasing their relative competitiveness. This will shrink the centre of Hoylake, reduce footfall and the number of shops and town centre uses, and allow shop units to be converted into flats or houses. The ability to attract visitors would also be affected. The justification for reclassification is difficult to understand, given recent trends including new shops and businesses, including a health food shop, therapy centre, café, gym, and two restaurants, two new hotels, several more new shops, another new restaurant, a building society plus a new restaurant on Kings Gap branded by Marco Pierre White under development, in addition to two thriving supermarkets, a busy and varied evening economy, a growing office sector and a number of specialist shops and cultural uses. This demonstrates that Hoylake is not a lost cause or in irreversible decline, especially given the potential to promote Hoylake as a tourist destination and as an attractive place to live, with assets including the Open Golf, coast, heritage, water sports cultural connections. There are wider issues to consider and efforts need to be made to reverse the trend for shoppers and retailers to look elsewhere.
1018	Disagree with the proposed hierarchy and the downward reclassification of Hoylake. Moreton, Liscard and Bromborough are referred to as locally popular for restaurants but Hoylake's strong restaurant offer is omitted. West Kirby, Wallasey and Heswall are referred to as popular locations for pubs and bars, in addition to Liverpool and Birkenhead but Hoylake's strong pub and bar offer is also omitted.
1031	National policy requires new retail development must be of an appropriate scale, in keeping with the role and function of the centre and the hierarchy of centres within the catchment area. It is not the role of a Core Strategy to alter the hierarchy established in RSS or to compete with larger centres such as Liverpool. New comparison retail development in Wirral should keep within the adopted RSS hierarchy and the proposed hierarchy of local centres listed, which does not include Wirral Waters. Object to the suggestion that the retail facilities at Northbank could be considered for future designation as an additional local shopping centre, as they are not included in the adopted retail hierarchy and could set a precedent for additional retail floorspace in this part of the Borough outside an appropriate assessment through the plan-led system.
1047	Agree with the proposed hierarchy.

1103	The 65% of spending on comparison goods taking place within the Borough should be considered positively as a very healthy proportion given the proximity to Liverpool and Chester. Retaining the present share of comparison shopping is a preferable objective.
OD1	Disagree with the proposed hierarchy. The position of Wallasey Village needs to be re-considered.
OD18	Disagree with the proposed hierarchy. District Centres like New Ferry are key to providing continued choice for residents who do not want to travel to Croft Retail Park, Birkenhead or Wirral Waters. There is an urgent need to retain and invest in existing centres to ensure they survive changing shopping patterns. Allowing more local shops to close and forcing residents to travel further afield will also be detrimental to the environment. New Ferry has many shops with no heating, toilets or phone connections. Without investment, who will want to start a business in buildings lacking basic amenities? Fledgling businesses will not be able to pay the higher rents in Birkenhead and at Wirral Waters, so smaller centres should be promoted as places where new businesses can start and build. District centres, outside Birkenhead, need a dedicated centre manager to promote them. Tranmere had funding, when will New Ferry, with just as bad social and economic conditions?

**7.28** The Council has responded to these comments by amending the retail hierarchy in the Preferred Options Report<sup>(17)</sup>.

### Providing for Additional Comparison Floorspace

**7.29** The responses to Consultation Question 16 - *Is this a fair assessment of the available Policy Options for accommodating future retail growth across the Borough? Are there any other Policy Options that should be considered? Please explain the reasons for your answer. Do you agree with the Council's conclusion that Policy Option CR2 is most likely to be the preferred option for accommodating future retail growth? If not, please indicate which Policy Option you would prefer and explain the reasons for your preference* - were mainly directed towards:

- the potential impact of development at Wirral Waters
- the need for the scale of development proposed
- the impact on Birkenhead and other centres
- the impact on the wider regeneration of the area
- the need to recognise the role of other existing out-of-centre facilities
- the need to re-assess alternative solutions
- the need for a strategy for other centres

**7.30** A summary of each of the comments received is set out in the table below:

17 Preferred Option 12 - Retail Network refers

ID	Summary of Responses Received
36	Disagree that this is a fair assessment and that Policy Option CR2 should be preferred, which effectively rules out any expansion in Birkenhead. A focus on Birkenhead and Liscard should be revisited (Option 3). Wallasey is densely populated, with low car ownership, only limited weight can be physically carried on public transport and Liscard could attract Government funding. Wirral Waters is too far in the future, has a reputation as an unsafe area and still assumes car ownership.
51	Disagree that this is a fair assessment and that Policy Option CR2 should be preferred. None of the options recognise the opportunity for additional floorspace at existing retail parks like Junction 1 Retail Park, where layout and appearance could be improved through reorganisation and reconfiguration. It is more sustainable to direct new floorspace to existing facilities to claw back spending than allow piecemeal and ad hoc provision along principal road frontages.
83	Disagree that this is a fair assessment and that Policy Option CR2 should be preferred. Neither Policy Option is acceptable. There will not be a need for additional retail comparison floorspace, which will detract from existing retail and leisure facilities. Internet shopping is likely to increase and any extra floorspace could be accommodated in vacant units in existing shopping areas, in either town centres or retail parks. An additional 'day out' location to Liverpool or Chester is not needed. Leisure facilities are already being provided at New Brighton, which could be undermined by Wirral Waters. A different Policy Option is needed to focus on the re-use of existing vacant units.
95	Disagree that this is a fair assessment and that Policy Option CR2 should be preferred. The need for extra retail floorspace is unclear given the satisfaction of current and foreseeable needs identified within the Report.
107	Disagree that this is a fair assessment and that Policy Option CR2 should be preferred. Retail development at West Kirby Concourse, cannot be justified, would damage existing convenience shopping and is incompatible with either Policy Option.
109	Disagree that this is a fair assessment and that Policy Option CR2 should be preferred. Extra retail development is not needed. Tourism development must also be carefully monitored. These Policy Options could lead to lots of empty, hard to fill spaces.
133	Disagree that this is a fair assessment and that Policy Option CR2 should be preferred. The analysis is lacking. Wirral Waters will have an impact on other centres and out-of-town retail parks. Public transport is not good and traffic growth needs to be restrained. Birkenhead North even at 600 metres

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	is too far away, even for fit people with bags. Fixed mode transport such as tram or rail will be needed. The impact on Birkenhead Town Centre is underplayed. Policy Option CR1 should be supported.
149	Disagree that this is a fair assessment and that Policy Option CR2 should be preferred. It is unclear whether the figures include the additional population at Wirral Waters. The current and future level of retail need should be identified. Both Policy Options involve a focus on Wirral Waters but it is not clear what will eventually be proposed. The hierarchy of centres does not include Wirral Waters. The Wirral Waters website, the Council's retail study and the Spatial Options Report are inconsistent in describing what will be a significant new development. A new retail centre should be assessed at regional level subject to whether any deficiencies could be addressed by promoting centres to a higher level in the hierarchy. It is not clear how the conflict with RSS Policy W5 could be overcome. Wirral Waters will compete with Birkenhead Town Centre. The evaluation matrix is flawed and should be scored as 'poor' rather than 'moderate' under the retail development criteria.
202	Disagree that this is a fair assessment and that Policy Option CR2 should be preferred. There is no evaluation of the impact of Liverpool One. A strategy to stem the loss of spending is questionable given the changed economic circumstances. It is not impossible to find opportunities to extend the existing Town Centre and more attention should be concentrated on upgrading it. It unnecessary to allow a competing, edge-of-town shopping development at Bidston. Birkenhead already has serious competition from Liverpool, a single underground station away, which will always be able to attract larger and higher quality retailers. Liverpool One already includes many of the traders that would be sought at Bidston. Chester further repeats and extends this choice. Many people already go to Liverpool and Chester. Another centre at Bidston will further reduce the number of people using Birkenhead and Liscard. Non-car owners, who should be able to access a suitable range and quality of items within the central shopping centre, will not be attracted. There is no need for so much extra floorspace. The population is limited. A development of the size suggested would need to pull trade from a very much greater area. Shops to service the new residential developments at Wirral Waters should be restricted to the sale of the local everyday requirements.
209	Disagree that this is a fair assessment and that Policy Option CR2 should be preferred. A further Policy Option is needed to focus on Birkenhead and Liscard. Merseyside is already awash with retail space. Wirral will never compete with Liverpool, Chester and Cheshire Oaks. Declining customer spending reflects the lack of 'joined-up' policies to regenerate and invest in existing centres and the impact of the internet. An out-of-centre development at Wirral Waters would be contrary to national policy in terms of reducing travel by car, meeting everyday needs locally and putting existing centres

	<p>first and contrary to RSS Policy W5. Investment is needed in all Wirral's existing centres, especially Birkenhead and Liscard, rather than development that will worsen their decline. National chain stores would only move more money out of the local economy and away from local traders. Employment growth at Wirral Waters would also be at the expense of employment in local centres and would not improve local distinctiveness. A ban should be placed on all further out-of-centre development.</p>
216	<p>Disagree that Policy Option CR2 should be preferred. Policy Option CR2 is not supported by the Sustainability Appraisal. Birkenhead Town Centre needs revitalisation in the context of the launch of Liverpool One but the evidence does not justify the abandonment of the traditional town centre.</p>
225	<p>Disagree that this is a fair assessment and that Policy Option CR2 should be preferred. Other Policy Options should be considered including the potential of declining centres to regenerate and the ability to use out-of-centre "over-trading" to support existing town, district or local centres.</p>
260	<p>Disagree that this is a fair assessment and that Policy Option CR2 should be preferred. The Policy Options should be reconsidered in the light of PPS4 in terms of the quantum of new town centre uses proposed; the relationship with the regional hierarchy; the emphasis on out-of-centre locations; the mis-alignment with RSS; the quantum of office and industrial floorspace and it's distribution; and the inter-relationship with other potential options.</p>
261	<p>Agree that this is a fair assessment but much depends on the delivery of Wirral Waters which, if established, will have a significant influence on the ability to develop additional floorspace elsewhere, which will create blight rather than growth.</p>
297	<p>Disagree that this is a fair assessment and that Policy Option CR2 should be preferred. Wirral Waters and other out-of-centre developments will be the last straw for Birkenhead, including Grange Road, Oxton Road and Westbourne Road. The Council should concentrate on increasing employment in manufacturing industries. Wirral Waters will only take sales away from other retail outlets in Wirral and is unlikely to compete with "days out" at the Trafford Centre or Cheshire Oaks.</p>
362	<p>Agree that Policy Option CR2 should be preferred but Birkenhead Town Centre should not be neglected in the same way that other town centres have suffered from out-of-town retail centres and regeneration should be promoted.</p>
395	<p>Agree that this is a fair assessment. Either Policy Option would be fine. It is reasonable that the practical difficulties associated with Policy Option CR1 should result in a preference for Policy Option CR2 but Wirral Waters must not be allowed to compete with convenience shopping in Liscard. Bus services from Liscard will need to be improved.</p>

402	Disagree that this is a fair assessment and that Policy Option CR2 should be preferred. Both Policy Options are unacceptable. The scale of development outside an identified regional centre far exceeds that envisaged by the adopted Development Plan and by national policy. The Core Strategy should not be bringing proposals that would substantially alter the regional shopping hierarchy and undermine existing regional and sub-regional centres such as Liverpool and Chester listed in RSS. Options 1 to 4 from the Council's retail study should be re-examined. The developer-led Strategic Regeneration Framework is not an appropriate basis for the preparation of a Development Plan under PPS12.
404	Empty shops should be used to provide for incubator businesses, to allow people to try their business ideas out.
415	Disagree that this is a fair assessment and that Policy Option CR2 should be preferred. Preferring Wirral Waters to the existing sub-regional centre of Birkenhead is unlikely to comply with regional policy. The relationship with Liverpool City Centre also needs to be clarified. There could be a significant impact on the retail function / sub regional status of Birkenhead and other existing centres, if a large amount of the overall retail floorspace was directed to the out-of-centre Wirral Waters development. Evidence will need to be robust.
417	Disagree that this is a fair assessment and that Policy Option CR2 should be preferred. The suggested level of need appears high and ambitious, particularly in the current economic climate. Delivery will rely on the full implementation of the Wirral Waters scheme. The inclusion of a phasing policy is supported, as there is a limited floorspace requirement to 2016, notwithstanding any initial development at Wirral Waters.
452	Disagree that this is a fair assessment and that Policy Option CR2 should be preferred. Policy Option CR1 should be preferred despite any current problems in Birkenhead. A decision to focus on Wirral Waters alone will further compromise the vitality and viability of retail outlets in Birkenhead Town Centre.
487	Liverpool may well be the most important destination for leisure and cultural activities but this should not prevent the Council from considering its own leisure and cultural attractions as an important contribution to the vibrancy of town centres, with a positive policy for promotion and protection.
492	Disagree that Policy Option CR2 should be preferred. Wirral Waters will be too big and too high and the buildings will be too close together. Retail growth could be accommodated elsewhere, like on the old Champion Spark Plugs site.

516	<p>Agree that Policy Option CR2 should be preferred but the Council should not rule out new convenience floorspace where rolling assessments and monitoring could establish a case. The ancillary convenience floorspace proposed at East Float could, for example, be relocated to Bidston Dock. The revised need figure to 2026 is supported. Policy Option CR2 is also supported given that significant change has not taken place in Birkenhead Town Centre despite major public investment and favourable market conditions for a number of years. Wirral Waters will need to be complementary to the Town Centre under either Policy Option and will lead to further opportunities for the Town Centre, which should be positively planned for, arising from an increased economic profile, population and better links and connections. The identification of Bidston Dock as the main location for comparison retailing and East Float as ancillary is supported. East Float should, however, be separately identified.</p>
532	<p>Disagree that Policy Option CR2 should be preferred. Additional comparison floor space should be encouraged within Birkenhead to comply with RSS Policy W5 under Policy Option CR1. Any impact from Wirral Waters on Birkenhead must be carefully considered due to its location on the edge of the regional centre.</p>
542	<p>Disagree that Policy Option CR2 should be preferred. Wirral Waters should be industrial not a mirror image of Liverpool One.</p>
613	<p>Disagree that Policy Option CR2 should be preferred. Either Policy Option CR1 or Policy Option CR2 would be acceptable and it is reasonable for the Council to prefer Policy Option CR2 on the grounds of easier implementation. Wirral Waters must not undermine convenience shopping in Liscard and bus services must be provided from Liscard to Wirral Waters.</p>
694	<p>Disagree that Policy Option CR2 should be preferred. It is unwise to rely on Wirral Waters. Birkenhead is still a good place to shop for many people, with realistically priced goods, an accessible and popular Market and easy access by bus and train. Wirral Waters is expensive and difficult to reach and would not be as attractive, particularly as trains and buses go to Liverpool and Chester as well as Cheshire Oaks. An alternative retail facility is already provided at Bidston Moss but a car is needed to get to it.</p>
724	<p>Agree this is a fair assessment but Policy Option CR1 should be preferred. Concentrating on Wirral Waters alone would risk the creation of a 'ghost town' in Birkenhead Town Centre similar to the impact of Liverpool One on Ranelagh Street in Liverpool.</p>
733	<p>Agree that this is a fair assessment and that Policy Option CR2 should be preferred.</p>

747	Disagree that this is a fair assessment and that Policy Option CR2 should be preferred. There are so many existing vacant shops in all the shopping areas of Wirral that it is difficult to imagine who is going to occupy any new outlets, especially when Liverpool, which also has a great number of vacant premises, is so easily accessible. The deterioration of Chester following the opening of Cheshire Oaks, which also has vacant properties, is an important lesson.
786	Disagree that this is a fair assessment and that Policy Option CR2 should be preferred. This is a major soundness concern. A major new out-of-town centre at Wirral Waters raises sustainability, accessibility and PPS4 concerns. There is no serious consideration of the impact on Wirral's current centres, especially Birkenhead and Liscard. The Council's retail study already raises concerns about the health of these centres. RSS Policy W4 sets out a presumption against new out-of-centre sub-regional comparison retailing facilities. Retaining more comparison expenditure within Wirral, means that it must come from somewhere else including other nearby centres outside Wirral, which will have an impact on the viability and vitality of town centres. A clear strategy for the future of Birkenhead and others centres is also lacking and issues related to the wider regeneration of Birkenhead need to be incorporated. Conclusions on the leisure/evening/tourism economy could also be briefly mentioned.
847	Disagree that this is a fair assessment and that Policy Option CR2 should be preferred. Policy Option CR2 is dangerous, putting all the eggs in one basket. The sustainability appraisal supports Policy Option CR1.
946	Disagree that this is a fair assessment and that Policy Option CR2 should be preferred. Both Policy Options focus on Wirral Waters. The benefits of investment in Birkenhead have not been fully assessed but would impact on the retail mix and anchors; town centre environment; social and economic prospects; and its competitive position. Focusing investment and development in Birkenhead Town Centre would offer confidence to the market, supporting and increasing the presence of national multiples, independent retailers and anchor stores; an improved shopping and working environment, leading to increased footfall and expenditure; boost the ability to attract and retain investment, with positive impacts on job creation and the evening economy; and achieve and retain a higher market share in light of already strong competition from Liverpool, Chester and Cheshire Oaks. The sub-regional status of Birkenhead Town Centre should be safeguarded by resisting development that would threaten it and by directing development towards it in line with national and regional policy. There is no evidence of a quantitative or qualitative need for Wirral Waters and the sequential test which directs available retail capacity to existing town centres, the impact on Birkenhead Town Centre and other centres, the social, employment, regeneration, heritage, accessibility or wider policy impacts have not been addressed. The diversion and take-up of any retail capacity identified for



Wirral Waters would diminish the prospects for new investment or regeneration in Birkenhead Town Centre. There was no final opportunity for consultation on the Council's retail study prior to publication, eliminating any opportunity for further representations or objections from key stakeholders, which is perverse given the magnitude of the likely impact of Wirral Waters both sub-regionally and regionally and the representations we have previously submitted. Very limited weight should therefore be attached to the findings and recommendations of this study. Alternative development solutions within or on the edge of Birkenhead Town Centre should be prioritised ahead of any out-of-centre locations based on comprehensive and rigorous testing. A major new out-of-centre retail destination at Wirral Waters will cause very serious harm to Birkenhead Town Centre in terms of market share, expenditure leakage, retailer mix, retailer demand, future investment, investor confidence, economic and social role, and employment. The market penetration of such an out-of-centre retail destination will also undermine other main and district centres as well as Chester and Liverpool. Access to retail and leisure uses at Wirral Waters will be largely dependant on car borne customers resulting in increased emissions. Less mobile sections of the community will not have access. The link between Birkenhead Central railway station and Wirral Waters is poor. The site's unsustainable transport provision conflicts with planning policy at all levels. It will lead to the decline in the competitive position of Birkenhead Town Centre, leading to depreciation in its retailer demand and representation and overall offer, which will disadvantage sections of the community who currently depend on it for a wide variety of goods and services. Wirral Waters is also unlikely to have a significant beneficial impact upon wider regeneration objectives within Wirral. It will in effect become a 'walled garden' with limited benefits to adjacent communities, including long-established Housing Market Renewal areas in greater need of investment and will displace wider regeneration plans for Wirral Waterfront. A high density scheme of tall buildings will have a considerable impact upon the skyline and detract from the setting of the Liverpool waterfront and its principal listed buildings, including the setting of the World Heritage Site. The resulting impacts will place at risk the private sector investment needed from the current owners within the Town Centre and other stakeholders. Diversion of trade and consequent shop closures and lack of investment will lead to a loss of town centre employment. A major new out-of-centre retail facility at Bidston Moss would also be contrary to PPS4 and RSS. Prior to the adoption of the Council's Retail Study, it was stated by Roger Tym that "an allocation could potentially decimate Birkenhead's future, regardless of the phasing of the scheme - the threat of it happening is simply enough to deter investment". There is little prospect of residential / office / mixed use waterside development coming forward on any meaningful regeneration scale without being underpinned financially by the major retail / leisure development at Bidston Dock. This is a 'trojan horse' to incrementally establish Wirral Waters as a new retail destination under the guise of regeneration whilst simultaneously decimating Birkenhead Town

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	<p>Centre. Any proposed scheme of the size of Wirral Waters should be decided through the development plan. It should not be decided on an ad hoc basis, directly through the planning application process. A further detailed submission has been provided in response to the planning application for East Float (09/06509). It is not acceptable for the retail study to conclude that there is a need for further retail development without regard to the central principle of 'town centre first'. The study should adopt a positive and, if necessary, an interventionist approach to Birkenhead Town Centre in line with PPS4. It should not discriminate against the town centre because of its existing deficiencies, should fully recognise its strengths and opportunities and build upon these to formulate a strategy which seeks to accommodate available retail expenditure within the town centre or its immediate edge, before considering other alternatives. RSS is wholly supportive of new retail investment opportunities being directed to existing town centres. It highlights Liverpool as one of two regional shopping centres and identifies Birkenhead in the second tier of the regional retail hierarchy. RSS states that out-of-centre development should be resisted. A retail allocation must be resisted to avoid irreparable damage to existing centres within the Wirral Waters catchment, including the sub-regional centre of Birkenhead. Such an allocation would be sufficient to suppress retailers from investing in existing centres and threaten their on-going viability. The Council should critically evaluate the impact of the Wirral Waters both in terms of its contravention of planning policy and its detrimental effect upon Birkenhead Town Centre.</p>
949	<p>Disagree that this is a fair assessment and that Policy Option CR2 should be preferred. A modified Policy Option CR1 should be preferred but with less ambitious plans for retail growth.</p>
959	<p>Disagree that this is a fair assessment and that Policy Option CR2 should be preferred. The Council has no "Plan B" and is basing the whole strategy on a successful Wirral Waters, handing power to an unelected developer. There is no strategy for addressing the decline of other centres in Wirral, like Hoylake.</p>
1002	<p>Disagree that this is a fair assessment and that Policy Option CR2 should be preferred. Nor can Policy Option CR1 be supported with Wirral Waters attached. The Borough will not be best served by any association with Wirral Waters ambitions.</p>
1010	<p>Disagree that this is a fair assessment and that Policy Option CR2 should be preferred. The transformational ambition of Wirral Waters is likely to impact both positively and negatively on the retail offer in neighbouring districts. Joint work is needed at City Region level to resolve these difficulties.</p>
1027	<p>Disagree that this is a fair assessment and that Policy Option CR2 should be preferred. The Council should re-consider retail study Options 1-3 in more detail, in the absence of a proper assessment through regional planning</p>

	<p>policies. The capacity identified is a long term need, partly dependent on the delivery of non-retail development to generate the necessary demand to support it, that will need to be carefully managed. The role of Croft Retail Park in providing for the needs of the southern half of the Borough and in retaining local comparison goods spending, should also be recognised, as an important existing location for ongoing investment in the future. The Croft Retail and Leisure Park should be specifically identified as an appropriate location in which to accommodate some of this identified retail growth.</p>
1032	<p>Disagree that this is a fair assessment and that Policy Option CR2 should be preferred. Oppose large scale retailing at Wirral Waters under either Policy Option. Wirral Waters is a developer-led aspiration with no allocation or planning status, which should not be the focus of new retail development in the absence of a proper assessment under regional policy. Retail study Options 1-3 should be re-considered in further detail. The developer-led Strategic Regeneration Framework is not a robust and credible evidence base. The development proposed at Wirral Waters would be contrary to national and regional policy in scale, location and prematurity and would fail the tests in PPS12.</p>
1067	<p>Disagree that this is a fair assessment and that Policy Option CR2 should be preferred. No effort is being made to develop in an environmentally responsible manner. A development at Wirral Waters would exacerbate car use and divert investment to a site detached from a host community. These disused industrial, commercial and port-related areas could be used for other uses to address Wirral's chronic shortage of allotments and low resilience in terms of local food supply. The money lost to the local economy from supermarkets and the energy profligacy of food transport miles and its damaging climate impacts are not acknowledged. Local sources and local production should be promoted to reduce negative climate impacts and oil dependency and to increase local resilience, with beneficial outcomes for the environment, health and wellbeing.</p>
1096	<p>Disagree that this is a fair assessment and that Policy Option CR2 should be preferred. The potential to cause further decline in The Pyramids and the impact on Liscard is understated.</p>
1134	<p>Support the conclusions regarding the absence of need for additional convenience retail provision.</p>

**7.31** The Council has responded to these comments by amending the Preferred Option in the Preferred Options Report<sup>(18)</sup>.

## Providing for Renewable, Decentralised and Low Carbon Energy

**7.32** The responses to Consultation Question 17 - *Is this a fair assessment of the available Policy Options for providing for the increased generation of renewable, decentralised and low carbon energy within the Borough? Please give the reasons for your answer. Do you agree with the Council's conclusion that a hybrid of Policy Options is most likely to be the preferred option for providing for renewable, decentralised and low carbon energy? If not, please indicate which Policy Option you would prefer and explain the reasons for your preference - were mainly directed towards:*

- the need to retain a target to prevent avoidance
- the need to include existing as well as new development
- the need to accommodate developing technologies
- the need to retain environmental safeguards
- the need to test the total performance of larger schemes
- the need to promote energy conservation as well as generation

**7.33** A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
37	Agree this is a fair assessment. Agree that a combination of Policy Options should be preferred but an underlying assumption of Policy Option RE1 should be maintained.
85	Agree that a combination of Policy Options should be preferred but insufficient, readily understandable information, is available to make any other decision.
96	Decentralise energy generation; increase renewable energy generation; reduce road useage. The only way to tackle climate change - man-made or natural - is on a "war-footing".
134	Agree that a combination of Policy Options should be preferred but the Spatial Options Report reveals a lack of understanding. The focus is on new development but huge resources can also be released by the conversion of existing houses, shops, retail warehouses and industry. The full range of sources including heat pumps, PV panels, solar panels, reuse of rainwater and wind turbines are not covered and can be used on new or existing buildings. The assessment needs to be revisited.
203	Agree this is a fair assessment. Agree that a combination of Policy Options should be preferred.

210	Disagree that a combination of Policy Options should be preferred, as this is an easy way out and provides too many excuses for not setting or achieving any targets. Realistic and challenging targets must be put in place in line with Policy Option RE1. <a href="http://www.greenpeace.org.uk/efficiency/councils">www.greenpeace.org.uk/efficiency/councils</a> provides additional ideas and proposals.
220	Disagree that a combination of Policy Options should be preferred. A hybrid would be too poorly defined. Whilst small scale generation is welcomed, encouragement of installation in the existing building stock as well as new development should be encouraged. Given the time scales involved, the preferred policy option also needs to allow for technology development. Land use options need to take account of the large scale projects such as tidal. The agricultural nature of the peninsula should provide an opportunity for power to be generated from farm waste.
246	Agree that a combination of Policy Options should be preferred but would like to see wood fuel explicitly recognised given the considerable resources in the Mersey sub-region and the regional intention to double woodland cover by 2050.
262	Agree this is a reasonable assessment but the likely implications for green infrastructure, coast and countryside are underplayed. The impacts of renewable energy schemes, such as turbines and barrages, remain to be quantified. Research indicates a trend of under-estimated impacts. A focus on visual impact alone against Spatial Objective 9 is not acceptable. A more realistic view of the implications would be welcomed. The flexibility of Policy Option RE3 is supported but targets must be capable of being exceeded. Settlement level detail is needed to ensure that targets are feasible and viable. An SPD approach may be needed. Detailed studies may also be needed in addition to the Merseyside Renewable Energy Capacity Study.
289	Agree this is a fair assessment. Agree that a combination of Policy Options should be preferred.
298	Agree that a combination of Policy Options should be preferred.
335	Agree that a combination of Policy Options should be preferred. Geographical areas should be identified for larger schemes but smaller schemes should also contribute. Where on-site provision is not feasible, a contribution to off-site schemes should be required.
363	Agree, as far as it goes but there is not enough encouragement for individual home owners to investigate self-generation.
428	Disagree that a combination of Policy Options should be preferred. Policy Option RE2 should be preferred to set targets for specific types of development that are most likely to be able to generate significant amounts of renewable energy.

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453	Agree that a combination of Policy Options should be preferred but a policy should be introduced to require all development to achieve the lowest possible level of carbon energy use and to incorporate micro-generation, solar panels and heat exchangers.
493	Agree that a combination of Policy Options should be preferred.
508	Agree that a combination of Policy Options should be preferred. Tidal power will hopefully provide a source of cheap energy.
541	Acknowledgement of the Power from the Mersey Feasibility Study is welcome as the most significant contributions will come from commercial-scale renewable and low carbon energy developments. Decentralised energy generation including on-site small scale and micro generation will make a significant, but smaller, contribution. The policy should support renewable energy projects, subject to appropriate criteria. The Merseyside Renewable Energy Capacity Study will provide a good basis but will not be able to assess the feasibility or viability of individual schemes. Flexibility is needed for changes in the market and low-carbon technologies. Targets must not be used to refuse planning permission, in line with national policy.
543	Agree that a combination of Policy Options should be preferred.
562	Increasing the amount of renewable, decentralised and low carbon energy is in line with RSS Policies EM15, EM16 and EM17.
583	Agree that a combination of Policy Options should be preferred but any requirements should be based on a sound evidence base. A comprehensive energy study should be undertaken to show which options may be best suited.
639	Paragraph 6.185 is speculation on the potential to generate up to 30MW. This plant is untested on this scale and production and emission outcomes are as yet unknown. There has been no study on the effect of local industries on the health and quality of life of Eastham residents and local air quality emissions are not mentioned.
641	Disagree that a combination of Policy Options should be preferred. Only Policy Option RE1 is preferred.
695	Methods of provision are un-tested. It has not yet been demonstrated that the initial outlay costs of wind farms can be recovered or that facts and figures can be produced to validate the claims of energy efficiency on a large scale. Small-scale, achievable projects in homes and neighbourhoods are acceptable but the environmental impact of larger schemes is still uncertain. A pilot scheme for historic properties in Port Sunlight and Bromborough Pool Village is welcome.

726	Disagree that a combination of Policy Options should be preferred as Policy Option RE3 would be the most sustainable and most achievable option.
734	Agree this is a fair assessment. Agree that a combination of Policy Options should be preferred.
742	Regulations for erecting wind turbines should be relaxed and residents encouraged to use small turbines where possible.
787	The evidence base to support more localised standards will be key.
848	The encouragement of different types of renewable energy must be set against its advantages and disadvantages but targets must be set to prevent avoidance, without being too prescriptive, to encourage as much generation as possible and to accommodate advances in technology. Information could be included in Design and Access statements. All development should provide for high energy and water efficiency, reduce waste, use the most sustainable methods and materials possible and must consider the energy costs of construction, use and disposal. The largest of the tidal energy scheme for the Mersey is, for example, likely to have a huge carbon cost in construction and disposal, leave a legacy of siltation which may lead to future flooding and could destroy an internationally important wildlife site.
849	There is no consideration of the effects on biodiversity. While climate change is a major threat to biodiversity, it is still possible to do serious local damage by the bad siting of a renewable scheme such as locating wind turbines in a major bat area or bird migration corridor. There must be protection against ill-informed and inappropriate schemes.
921	Agree that a combination of Policy Options would be appropriate but support the use of targets to ensure that they are met to a suitable extent by all types of development in all areas of the Borough, subject to stringent criteria for relevant environmental concerns such as impacts on landscape, biodiversity and local character.
929	Disagree that a combination of Policy Options should be preferred. Policy Option RE3 should be preferred to allow targets to be set within each Settlement Area, with contributions from stand-alone schemes and smaller developments.
950	Agree this is a fair assessment. Agree that a combination of Policy Options should be preferred.
960	Disagree that a combination of Policy Options should be preferred. The Council's approach should be clearly defined but flexible. It is not, however, clear how this will be delivered if the Council is not going to set up its own alternative energy production. Given large areas of farmland, there should an opportunity for the appropriate development of 'green energy'.

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977	Agree that a combination of Policy Options should be preferred but the definition of renewable, decentralised and low carbon energy must be wide to avoid the exclusion of specific technologies.
1003	Agree that a combination of Policy Options should be preferred.
1011	At present, low carbon opportunities focus on 'big projects' such as tidal power and energy distribution networks. The Core Strategy should support the development of the low carbon economy by quality-assuring new developments and by retrofitting the existing housing and commercial stock, to stimulate the local supply chain and provide additional opportunities for investment.
1048	Agree that a combination of Policy Options should be preferred but the approach must also promote a reduction in energy use, energy conservation and an increased role for micro-generation. The viability of different technologies and the capacity of each Area to absorb renewable energy development without noticeable harm to heritage assets, biodiversity, coast and countryside must be considered.

**7.34** The Council has responded to these comments by amending the Preferred Option in the Preferred Options Report<sup>(19)</sup>.

## Providing for Better Design

**7.35** The responses to Consultation Question 18 - *Is this a fair assessment of the available Policy Options for the approach to securing the most appropriate design in new developments? Please give the reasons for your answer. Do you agree with the Council's conclusion that a hybrid of Policy Options is most likely to be the preferred option for securing better design in new developments? If not, please indicate which Policy Option you would prefer and explain the reasons for your preference* - were mainly directed towards:

- the need for a robust general policy
- the need for more site specific controls
- the need to promote more sustainable development and construction

**7.36** A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
38	Agree this is a fair assessment. Agree that a combination of Policy Options should be preferred.
42	There is no mention of "long sight-lines", recognised over last twenty years to be important to people's health.

19 Preferred Option 14 - Decentralised Energy refers



87	Agree that Policy Option DE3 is better for major developments but this must not interfere with the current system of negotiating with individual applicants on a case-by-case basis, to ensure that the character of an area is preserved (not just in Conservation Areas), which works well, without being over prescriptive.
97	The shape and appearance of new buildings should take account of existing buildings and the location. The failures of the 60's and 70's were disastrous but thought marvellous at the time. Traditional building is better, with internal flexibility. We no longer have the opportunity nor space to build another Port Sunlight. The best of what we have is what must be sought.
135	Agree this is a fair assessment. Agree that a combination of Policy Options should be preferred but matching the character of existing areas, heritage and providing for renewables in new and existing buildings needs to be taken into account. The Sail Project in West Kirby demonstrates that Wirral does not have an adequate specialist understanding of design.
204	Agree this is a fair assessment. Agree that a combination of Policy Options should be preferred.
211	Disagree that a combination of Policy Options should be preferred as Policy Option DE3 would provide greater protection for the character and visual amenity of specific areas. All the Options appear to be mainly concerned with the design of larger development projects and something should be included to enhance the design of smaller, one-off projects and 'side extensions'. The requirements of good design must not be balanced against benefits of obtaining the development proposed.
263	Design quality and sustainability should be integral but there are also benefits to having a separate policy setting out the principles of sustainable design, as a hook for a more detailed policy at a lower tier. Policy Option DE3 is not appropriate at Core Strategy level. An overarching design policy within a DPD or SPD can ensure that any geographical specific design issues are identified and appropriately addressed at the detailed planning application stage.
290	Agree this is a fair assessment. Agree that a combination of Policy Options should be preferred.
299	Agree this is a fair assessment. Agree that a combination of Policy Options should be preferred.
331	Agree that a combination of Policy Options should be preferred as all three options have the potential to contribute to sustainable development. A broad policy option supported by SPD would set out how development can contribute across the entire Borough but agree that areas set aside for major development has the potential to deliver sustainable development on a larger scale.

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364	Agree this is a fair assessment. Agree that a combination of Policy Options should be preferred.
429	Agree that a combination of Policy Options should be preferred but this should only include a mix of Policy Option DE2 and Policy Option DE3. The focus of the Core Strategy should be on spatial issues with detailed design issues in separate DPDs or SPDs.
454	Generally agree that a combination of Policy Options should be preferred but there is a case for being much more prescriptive with a standard design policy supported by SPDs relating to specific areas.
494	Definitely need better design than we had in the 1960's to end up with monstrosities like West Kirby Concourse. Birkenhead has some magnificent architecture such as Birkenhead Park entrance and Hamilton Square. There should be a competition to see who can design the best buildings.
643	Disagree that a combination of Policy Options should be preferred. Policy Option DE3 would provide more detailed requirements but this would not necessarily apply to immune canal-related development.
696	A robust, not just adequate, level of control is needed. The broader the area covered the better. With careful negotiation, surely a good, acceptable scheme can be designed, which people can live with. There are examples of unfortunate results in Bromborough along the A41 and elsewhere where the visual impact on the Green Belt and Conservation Areas has been unwelcome.
727	Agree this is a fair assessment. Agree that a combination of Policy Options should be preferred.
735	Agree this is a fair assessment. Agree that a combination of Policy Options should be preferred.
788	Would expect to see some sort of policy on this issue with links to hang detailed policy development within SPD. The plan can refer to national policy guidance to avoid repetition and concentrate on how issues for the Borough need to be addressed. The criteria proposed should be referred to at the next stage of plan consultation.
850	It is essential that all new development and refurbishment becomes zero-carbon as soon as possible. All developments should include high energy and water efficiency, reduce waste by converting existing buildings and use the most sustainable methods and materials possible. The building industry needs to be persuaded to modernise its approach rapidly but rapidly evolving technology will mean that it will not be possible to be too prescriptive. All developments need to consider the energy costs of construction, use and disposal.

851	Ellesmere Port is aiming to become a major centre for technological industries, no doubt including the energy sector, which could be useful to Wirral as the current car factory is a major employer of Wirral residents and may not survive many more decades. Existing technologies such as solar, green roofs and district heating should also be employed, which developers in Wirral have been slow to come forward with.
922	Agree that a combination of Policy Options should be preferred. Geographically specific design policies will help to conserve local character and distinctiveness but the inclusion of an overarching Borough-wide design policy is supported to ensure that all new development adheres to suitable standards to achieve more environmentally sustainable design and to conserve and enhance local character. Opportunities to maximise sustainability, green infrastructure and biodiversity should be incorporated into any design, which could include recycled materials, wildlife-friendly landscaping, green roofs, naturalistic wetland features associated with a sustainable urban drainage scheme etc.
951	Agree this is a fair assessment. Agree that a combination of Policy Options should be preferred.
964	Disagree that a combination of Policy Options should be preferred. The Council's Preferred Option should be clearly defined.
975	Disagree that a combination of Policy Options should be preferred as Policy Option DE3 is likely to be the best and most efficient way of securing the right type of development in the right place. Geographically specific design policies would need to be informed by an understanding of the historic environment of the area. One component needs to be a characterisation of the surrounding historic environment.
1050	Agree that a combination of Policy Options should be preferred. Policy Option DE2 would be the most appropriate but needs to be linked to an approach similar to Policy Option DE3 so that specific advice is provided, tailored to the characteristics of particular localities through site specific DPDs, SPDs or Design Briefs. The policy also needs to address sustainable construction issues, minimising energy, water use and waste. It would be too difficult to incorporate meaningful design elements into every policy under Policy Option DE1.
1082	Agree that a combination of Policy Options should be preferred.

**7.37** The Council has responded to these comments by retaining a mixed approach in the Preferred Options Report<sup>(20)</sup>.

## Providing for Development Management

**7.38** The responses to Consultation Question 19 - *Is this a fair assessment of the available Policy Options for providing criteria for development management decisions within the Borough? Please give the reasons for your answer. Do you agree with the Council's conclusion that Policy Option DM2 is most likely to be the preferred option for providing criteria for development management? If not, please indicate which Policy Option you would prefer and explain the reasons for your preference - were mainly directed towards:*

- the need for additional advice for developers
- the need for locally sensitive details
- the need for additional community consultation
- the need for additional DPDs or SPDs

**7.39** A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
39	Agree this is a fair assessment. Agree that Policy Option DM2 should be preferred.
86	Agree that Policy Option DM2 should be preferred as it will allow for more locally specific guidance. People value the uniqueness of the area where they live, particularly here in New Brighton.
98	Agree this is a fair assessment. Agree that Policy Option DM2 should be preferred.
136	Agree this is a fair assessment. Agree that Policy Option DM2 should be preferred.
205	Agree this is a fair assessment. Agree that Policy Option DM2 should be preferred.
212	Agree that Policy Option DM2 should be preferred.
264	Agree this is a fair assessment. Agree that Policy Option DM2 should be preferred as the more clarity that can be given to developers the better the outcome. An additional option would be to include development management criteria policies within another DPD or SPD, preferably a DPD.
291	Agree this is a fair assessment. Agree that Policy Option DM2 should be preferred.
308	Agree that Policy Option DM2 should be preferred.
365	Agree in general terms but as much specific detail as possible should be provided in terms of each individual Settlement Area.

430	Disagree. This type of policy should not form part of the Core Strategy but should be included within a separate DPD.
455	Generally agree that Policy Option DM2 should be preferred.
495	Disagree that Policy Option DM2 should be preferred as real experts are needed, which Wirral Borough Council does not seem to have.
585	Agree that Policy Option DM2 would be beneficial.
591	Agree that Policy Option DM2 should be preferred but this could also be contained within a separate subsequent DPD.
644	Agree that Policy Option DM2 should be preferred but any developer must be required to consult local communities and accept their comments. The Council should also take residents' opinions into consideration, as this has been ignored in recent planning applications in Eastham.
697	Agree that Policy Option DM2 should be preferred but carefully worded criteria would be needed, based on local consultation.
729	Agree this is a fair assessment. Agree that Policy Option DM2 should be preferred as it seems likely to be the clearest.
754	Development proposals should be properly integrated. All too often large housing estates have been built and only at a later time, when the money has run out, have thoughts of leisure facilities been considered.
789	We would expect to see some sort of policy on this issue with links from which to hang more detailed policy development within SPD. The plan can refer to national policy guidance to avoid repetition and concentrate on how issues for the borough need to be addressed. The criteria likely to be proposed should be referred to at the next stage of plan consultation.
852	Agree that Policy Option DM2 should be preferred because of the opportunity to include suitable guidance on biodiversity impacts for particular areas such as the importance of sequences of large gardens in some places and the need for green infrastructure in others.
923	Agree that Policy Option DM2 should be preferred as it will be important to include an overarching policy covering locally specific criteria that can be referred to alongside other policies. This should include impact on local character, amenity, open space, green infrastructure, designated sites and features, BAP habitats and species, local landscape character and townscapes.
952	Agree this is a fair assessment. Agree that Policy Option DM2 should be preferred.

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965	Agree this is a fair assessment. Agree that Policy Option DM2 should be preferred.
978	Agree that Policy Option DM2 should be preferred but this will need to be supported by the proposed Heritage DPD.
1005	Disagree that Policy Option DM2 should be preferred as this will simply provide room for confusion, duplication and over-complication.
1051	Agree that Policy Option DM2 should be preferred but additional thought will need to be given to the topics covered and the specific criteria to be included.

**7.40** The Council has responded to these comments by not changing the Preferred Option in the Preferred Options Report<sup>(21)</sup>.

## Providing for Developer Contributions

**7.41** The responses to Consultation Question 20 - *Is this a fair assessment of the available Policy Options for the approach to securing appropriate developer contributions from new developments? Please give the reasons for your answer. Do you agree with the Council's conclusion that Policy Option DC2 is most likely to be the preferred option for securing developer contributions? If not, please indicate which Policy Option you would prefer and explain the reasons for your preference - were mainly directed towards:*

- the need for further details to be provided
- the need for a simple, easy, cheap and bespoke solution
- the need for flexibility
- the need for transparency and greater fairness in distribution
- the types of benefit that should be included
- the position of community and voluntary groups
- the potential impact on the prospect of development

**7.42** A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
10	Agree this is a fair assessment. Agree that Policy Option DC2 should be preferred but paragraph 6.242 is open to misinterpretation. Planning obligations can make acceptable any development which would otherwise be unacceptable in planning terms and it is reasonable to seek planning obligations if the development would exacerbate an existing deficiency.

21 Preferred Option 16 - Development Management refers

40	Agree that this is a fair assessment but agree that Policy Option DC2 should be preferred but the text should make clear that "contributions" and "levy charges" will not be applied to community or voluntary groups and should be able to make use of any monies generated.
88	Agree that Policy Option DC2 should be preferred as it is vital that developers contribute to infrastructure particularly in large schemes and the Community Levy is likely to be required in the future.
99	Private sector funding is the only viable option but the developer must be required to fully engage with public stakeholders.
137	Agree this is in general a fair assessment. Agree that Policy Option DC2 should be preferred but a more balance assessment of local needs is needed as the majority of contributions seem to be unfairly directed towards highway improvements. The amounts raised and how they have been used should be openly published to test their effectiveness. If CIL is not enacted, Policy Option DC1 needs to be applied to ensure developer contributions continue to flow.
206	This seems a sure way of driving developers out of the area and preventing the provision of affordable homes. Sale prices and rents are already insufficient, in many cases, to cover the costs of land and construction. Incentives may be necessary to promote needed development.
213	Agree this is a fair assessment. Agree that Policy Option DC2 should be preferred to give the Council the flexibility to deal with forthcoming legislation and give more consideration to local requirements. Hopefully this put an end to developers promising to provide a public facility in exchange for planning permission, like at the Sail Hotel project in West Kirby, which is too open to abuse.
265	Agree this is a fair assessment but either Policy Option would work. It is, however, important that the scope of what the funding can be used for is clearly set out and transparently monitored. This would be particularly useful for green infrastructure, delivery of the City Region Ecological Framework, habitat expansion and also, perhaps, for off-site community-based renewable energy schemes.
292	Agree this is a fair assessment. Agree that Policy Option DC2 should be preferred.
309	Agree that Policy Option DC2 should be preferred. If Broad Spatial Option 2 were preferred income from developers would be higher and improvements could be secured over a wider area of the Borough benefiting a larger number of people. Under Broad Spatial Option 1 up to 90% of the population would see no benefit at all.

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316	The funds levied should be used to provide community facilities such as health centres, community halls and meeting places, places of worship, leisure, arts, culture and entertainment facilities, public open space, playing fields, sport and recreation facilities, wildlife resources, children's play areas and public toilets. Places of worship should be explicitly included.
366	It is difficult to judge until the framework for the community infrastructure levy charging schedule has been finalised and made subject to further consultation but this is likely to lead to private sector developers preferring the most lucrative greenfield sites.
431	Disagree that Policy Option DC2 should be preferred. Detailed local requirements should continue to be implemented through the negotiation of legal agreements on a site-by-site basis.
456	Agree that Policy Option DC2 should be preferred and not before time.
496	Policy Option DC2 needs further explanation.
522	Disagree that Policy Option DC2 should be preferred. It would be wrong to commit to a single solution at this stage. Project-specific approaches would be able to better reflect the needs of individual projects.
645	Agree that Policy Option DC2 should be preferred
698	The Council's policies should not be developer-led, at the cost of losing greenfield and Green Belt land and affecting the historic environment.
731	Disagree that Policy Option DC2 should be preferred. The decision will depend on the final contents of the CIL schedule. Any decision that allows the Council to continue to enforce legal agreements and obligations is a sensible way forward.
738	Agree this is a fair assessment. Agree that Policy Option DC2 should be preferred.
790	Any solution should offer the flexibility to choose the CIL route. Any key pieces of infrastructure required should be highlighted in the Plan.
797	The references to funding in the Open Space Assessment are out-of-date. The Community Investment Fund is no longer available. Details of potential funding through Sport England and National Governing Bodies for Sport can be viewed at <a href="http://www.sportengland.org">www.sportengland.org</a> . The lack of a robust evidence base to support the preparation of local standards for both indoor and outdoor sports facilities could affect the ability to secure funding through Section 106 planning obligations.



805	Agree that Policy Option DC2 should be preferred. Any policy must set out the types of development for which contributions will be sought, the thresholds for providing such contributions and how this money will be spent or distributed. Any such policy should include contributions towards indoor and outdoor sports provision.
924	Support the use of developer contributions as a tool to improve infrastructure and services for new developments. Developer contributions should also increase the funding available to provide and improve green infrastructure which offers wide ranging social and environmental benefits, in a co-ordinated and strategic way.
953	Agree this is a fair assessment. Agree that Policy Option DC2 should be preferred.
967	Disagree that Policy Option DC2 should be preferred as Policy Option DC1 seems to be the simplest and most easy to operate, at the lowest cost to the taxpayer. The Council should make use of existing structures rather than creating a new one.
979	Developer contributions should be included for environmental, public realm and historic environment improvements. Developer contributions could also be used to address heritage assets at risk.
1006	Agree that Policy Option DC2 should be preferred
1052	Agree this is a fair assessment. Agree that Policy Option DC2 should be preferred.
1131	The Community Infrastructure Levy has problems related to implementation mechanisms and economic viability testing. The Government has also recommended that CIL should be implemented at sub-regional level, on the basis of joint working between local authorities. The scope and detail of the work required to support such a Levy needs further consideration.

**7.43** The Council has responded to these comments by not altering the Preferred Option in the Preferred Options Report<sup>(22)</sup>.

## Providing for Green Infrastructure

**7.44** The responses to Consultation Question 21 - *Is this a fair assessment of the available Policy Options for the protection and provision of green infrastructure across Borough? Please give the reasons for your answer. Do you agree with the Council's conclusion that Policy Option GI2 is most likely to be the preferred option for the protection and provision of green infrastructure? If not, please indicate which Policy Option you would prefer and explain the reasons for your preference* - were mainly directed towards:

22 Preferred Option 17 - Developer Contributions refers

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- the need to retain standards as part of the overall approach
- the need to consider biodiversity, heritage, Green Belt, woodland, agriculture and horticulture
- the need to strengthen the evidence base
- the need to address maintenance issues
- the need for sub-regional integration
- the need to balance green infrastructure against other aspects of quality of life

**7.45** A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
41	Agree this is a fair assessment. Agree that Policy Option GI2 should be preferred.
42	Allotments, for which demand is high, are not mentioned.
89	Agree that Policy Option GI2 should be preferred as it recognises local distinctiveness. Limited funds to increase standards is a concern. Special expertise is required. Need further detail on the hierarchy.
100	Agree this is a fair assessment. Agree that Policy Option GI2 should be preferred.
110	How can a deficiency be justified in Settlement Area 6 with parks, hills, gorse-lands, walking and viewing places, sailing, wind-surfing, beaches, islands and the coastline which also contribute to the day-trip economy.
138	Disagree that this is a fair assessment but agree that Policy Option GI2 should be preferred. The Open Space Assessment should be available; quality and hierarchy are not addressed, given the steady decline in maintenance since the 1970's and the backlog of improvements; it should be clear that open space will be protected; demand needs to be provided for; and the Merseyside Rural Study needs to be included and made available for consultation. The inclusion of non-Council owned land is welcomed.
207	Agree this is a fair assessment. Agree that Policy Option GI2 should be preferred.
214	Agree that Policy Option GI2 should be preferred provided that public rights of way are given full and equal protection. Public concern about green environment and local character are often ignored for more and more development, which is not wanted outside Settlement Areas 1, 2, 3 and 4. Investment should protect the Green Belt, green infrastructure and heritage. Scarce resources should not be ploughed into projects like the Sail Hotel or Golf Resort.

226	The Draft Open Space Assessment (January 2010) should not have been included. The assessment is incomplete and must be subject to further consultation.
242	<p>Agree this is a fair assessment but disagree that Policy Option GI2 should be preferred. The protection of irreplaceable assets such as ancient woodland needs to be explicit in line with national and regional policy. The multi-functional benefits of woodland should be referred to in line with the national Strategy for England's Trees Woods and Forests, the reclamation of contaminated brownfield land, the ambition to double woodland cover in the region by 2050. Numerical standards should be retained to clearly identify areas of deficiency. The Natural England Access to Natural Greenspace Standard and the Woodland Trust Woodland Access Standard are both relevant. The Woodland Access Standard indicates a significant deficiency in access to small woods close to where people and access to larger woods a little short of the regional average.</p> <p>The full 'Space for People' report can be found at: <a href="http://www.woodlandtrust.org.uk/SiteCollectionDocuments/pdf/spaceforpeople.pdf">http://www.woodlandtrust.org.uk/SiteCollectionDocuments/pdf/spaceforpeople.pdf</a>.</p>
259	Agree that Policy Option GI2 should be preferred but the emphasis on satisfying local requirements must be balanced against the need for a Borough wide or sub regional approach to ensure that the wider, multi-functional benefits of green infrastructure and its management are also addressed.
266	Agree this is a fair assessment. Agree that Policy Option GI2 should be preferred as it allows greater flexibility for local circumstances and needs but a separate SPD may be warranted for all the local detail. The Open Space Assessment must be cross-referenced with the Biodiversity Audit and the City Region Ecological Framework to identify priorities for biodiversity.
293	Agree this is a fair assessment. Agree that Policy Option GI2 should be preferred.
310	Agree that Policy Option GI2 should be preferred but infill development can sometimes make better overall use of residential land. It is better to leave the Green Belt free from encroachment to maintain a balance between a vibrant economy, good leisure facilities and a 'green and pleasant land'.
332	Agree that Policy Option GI2 is likely to be effective for some of the more sensitive sites but Borough-wide standards should still be required. A Green Infrastructure Study is required to support the Growth Point, which may influence the final preferred Policy Option.
346	The European Landscape Convention must be addressed. Local partnerships could manage small green space areas or run village green space projects.

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367	Agree that Policy Option GI2 should be preferred as the only realistic option to address the individual needs of each Settlement Area.
396	Agree this is a fair assessment. Agree that Policy Option GI2 should be preferred.
432	Agree that Policy Option GI2 should be preferred to allow Borough wide standards to be set for different types of space or feature.
457	Disagree that Policy Option GI2 should be preferred as Policy GI2 will ignore areas outside the Settlement Areas. Green infrastructure should be a Borough-wide issue.
498	Agree that Policy Option GI2 should be preferred but the planning department have a poor record, The Warrens treachery being a case in point, despite being in the Green Belt and available alternatives. I expect this will happen again.
523	Agree that Policy Option GI2 should be preferred rather than seeking to apply rigid standards, to respond to need and allow flexibility.
560	Green Infrastructure mapping should support policy development. Wirral is part of the Coastal Trail and Mersey Waterfront Regional Park and RSS Policy EM4 applies. Further information can be found at <a href="http://www.greeninfrastructurenw.co.uk/resources/GIguide.pdf">www.greeninfrastructurenw.co.uk/resources/GIguide.pdf</a>
598	The Mersey Coastal Park proposals will make a significant contribution to shortfalls in Settlement Areas 3 and 4 as a complementary sub-regional strategy.
647	Agree that Policy Option GI2 should be preferred. Green Belt and open space should be retained in and surrounding Eastham Village including land owned by Peel.
664	Agree that Policy Option GI2 should be preferred but this will still fail to address the lack of even adequate maintenance of parks, play areas and public gardens. Maintenance should be included in the wording of the Policy Option.
699	Agree that Policy Option GI2 should be preferred but this must be supported by adequate staffing levels.
736	Disagree that this is a fair assessment. A shortage of allotments is not identified in Settlement Area 6, despite having the two of the longest waiting lists in the Borough and some open spaces are missing from the Settlement Area profile.
739	Agree that Policy Option GI2 should be preferred as different areas require different infrastructure.

791	The section needs to be further developed by looking at individual spatial areas.
807	Agree that Policy Option GI2 should be preferred, dependant on the robustness of the evidence base.
853	Agree that Policy Option GI2 should be preferred as particular types of green infrastructure depend on geography, geology and history as well as opportunity and management. Railway, major road and other corridors such as rows of large gardens should be included and will be vital as wildlife moves to respond to climate change. The co-occurrence between the need for additional semi-natural space and allotments should be exploited. Natural England have standards for access to natural and semi-natural green space. The impact on biodiversity is not considered under the implications for the Spatial Objectives. Much green infrastructure such as sports pitches and close-mown amenity grassland can be low in biodiversity. The approach must recognise that wildlife cannot easily be moved and must be worked around.
891	Welcome the emphasis on promoting and encouraging healthier lifestyles. Merseyrail Electrics was recently awarded 'Cycle Demonstration' status and will, over the next two years, make significant improvements to cycle provision at rail stations between Birkenhead and Hooton.
925	Disagree that Policy Option GI2 should be preferred. An overarching numerical standard for the Borough as a whole is still needed alongside a protection of local character. Green infrastructure should have been introduced earlier, for example, between the policies on renewable/low carbon energy and better design, to enhance its importance.
954	Agree this is a fair assessment. Agree that Policy Option GI2 should be preferred.
968	Agree that Policy Option GI2 should be preferred. The Council should clearly distinguish between Green Belt and other 'greenfield' land and re-affirm support for Green Belt boundaries and opposition to 'inappropriate development' in the Green Belt.
980	Agree that Policy Option GI2 should be preferred to allow for a more locally tailored approach. The wider value of sites such as Birkenhead Park, a Grade I registered Park and Garden of national and international significance, should be recognised and historic environment considerations need to be included.
1007	New development could improve provision and tackle deficiencies in all the Settlement Areas.

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1053	Agree this is a fair assessment. Agree that Policy Option GI2 should be preferred to provide better guidance more closely related to local needs and character.
1065	Green infrastructure should be treated as critical infrastructure at a strategic level to include the protection of land with agricultural and horticultural potential, linked to the strategic vision of the NW Green Infrastructure Prospectus and the use of locally customised Sustainability Checklists.

**7.46** The Council has responded to these comments by amending the Preferred Option in the Preferred Options Report<sup>(23)</sup>.

## Additional Policy Options

**7.47** The responses to Consultation Question 22 - *Are there any other policy areas that you think should be considered as part of the Core Strategy Development Plan Document for Wirral? Please give the reasons for your answer* - were mainly directed towards:

- the need for a greater environmental emphasis
- climate change and peak oil
- minerals and waste
- transport and infrastructure
- community and culture including health, tourism and sport
- the rural economy

**7.48** A summary of each of the comments received is set out in the table below:

ID	Summary of Responses Received
42	There is no mention of disability or the need for every planning application to include a full DEIA, paid for by the applicant. There is only one mention of "archaeology" and no mention of the impact of VAT rules on re-development.
101	Disability issues need to be addressed. There is little mention of allotments.
139	The full range of transport and highways policies including parking, traffic levels, public realm, pedestrians, cycling etc., is missing. Information on indoor recreation and the potential for centres of excellence is lacking.
170	The Government is considering passing more power back to local people. The Council should set up a Select Committee to look at how to drive this forward.

23 Preferred Option 18 - Green Infrastructure refers

215	Side extensions to detached and semi-detached domestic property are being allowed outside current policy in UDP Policy HS11 and SPG11 with a poor effect on character and visual amenity. A more robust policy is needed. Gaps between buildings of as little as 15cms are being allowed, leading to harmful terracing.
267	Minerals; Green Belt; contaminated land; agriculture and the rural economy have only limited coverage.
268	The document needs to better consider the likely longer term effect of its decisions beyond the immediate plan period. Wirral Waters, for example, will have achieved a critical mass by 2031 but will continue to grow for at least a further decade. It is not clear what continued effect this would have on development in other Settlement Areas.
333	The document appears weighted towards social and economic issues such as jobs and homes. only two Policy Options are directly relevant to the environment and there is nothing on other environmental improvements. A broader Policy Option encompassing environmental obligations other aspects of the environment including the Water Framework Directive, pollution control and flood risk would be welcome. It is unclear whether any further consultation will be allowed.
458	Farming is still important and providing for agriculture should be a key element. High grade agricultural land is still identified a resource of national importance and non-agricultural uses should be resisted to protect local food production.
485	The implications for existing community and cultural infrastructure has not been taken into account.
488	There is no Policy Option for community and cultural facilities.
559	More detail is needed on how the Council will deliver policies for the environment rather than just considering the implications of other policies.
563	More detail is needed on how waste will be re-used, recycled or re-processed and diverted from landfill in line with RSS Policies EM10, EM11, EM12 and EM13.
635	More information is needed on delivery and infrastructure. Key infrastructure should be embedded within the strategy with evidence on costs and sources of funding. Development funded infrastructure will need evidence on viability and timescales. The infrastructure needs of development likely to take place within the first five years must be fully resolved with the position of key agencies secured. Flexibility and contingency planning will be needed to cover any uncertainties.
648	Green Belt is missing.

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686	A concise and flexible telecommunications policy needs to remain in one of the Council's statutory Local Development Documents. A policy wording is suggested.
691	Strategic policies for minerals and waste are needed.
692	SPDs will need to be mentioned in policy if you still wish to use them.
700	Tighter controls on enforcement staff is needed.
737	The arts, cinema and theatre are not considered.
812	It is not clear how indoor sports facilities will be protected and enhanced.
844	The emphasis on accessibility and public transport should increased. The development of the Bidston-Wrexham rail line needs to be included to reduce car use and provide for more low-carbon travel.
854	Biodiversity needs better coverage to reflect Wirral's international, national and local responsibilities including protection, enhancement, management, education, appreciation, tourism and quality of life.
876	The ongoing provision and improvement of healthcare facilities is under-represented, to provide capacity to serve new development. Further employment and housing should be provided around existing facilities such as Clatterbridge Hospital, to create more sustainable communities.
930	Greater attention is needed for the rural areas.
970	The strategy needs to be tested against actual performance and decisions to prevent decisions like The Warrens and compare performance with other Councils. The strategy also needs to be re-assessed against the current recession.
972	A policy is needed to allow district and local centres to continue to serve the retail needs of local communities.
981	A policy on local distinctiveness and the historic environment is needed to set the framework for the proposed Heritage DPD and to address the many issues raised in the Spatial Portrait. Consideration should also be given to a policy on climate change, to cover adaptation and mitigation, flood risk and the retrofitting of historic buildings. A policy for tall buildings should be developed.
1017	Further consultation is needed with National Grid as UK energy systems will need to undergo significant changes over the next 20 years to ensure that the safe and secure transportation of electricity and gas is not compromised.



1026	Further opportunity should be provided to comment on any additional policies, prior to the publication of the final submission document.
1054	The overall tourism strategy is unclear in terms of the balance between new attractions and existing locations.
1063	The need to readjust to rising energy prices and the decline of oil supplies is not addressed. A strategic response is required. A delivery framework with a strong local focus is needed to develop local resilience and recognise the value and scale of local community action. Climate change is not dealt with in sufficient detail and should not be sidelined as a cross-cutting objective for a "business-as-usual" Core Strategy, which should set out in detail how Wirral will become a low-carbon peninsula.
1116	More detail is needed on how existing environmental assets such as landscape character, heritage features and protected species will be protected and enhanced.
1117	The approach to rural areas, rural diversification and agriculture is unclear.
1132	There is scope to include Policy Options for waste and minerals, nature and heritage conservation, the coast, transport, tourism and leisure, education and skills and community facilities.

**7.49** The Council has responded to these comments by including additional references throughout the Preferred Options Report and by including additional Preferred Options for minerals and waste management<sup>(24)</sup>.

## 8 Document List

**8.1** The following comments were received on the document list:

ID	Summary of Responses Received
267	The City Region Ecological Framework and Green Infrastructure Strategy should be added.
601	The Mersey Coastal Park Strategy should be added.

**8.2** The Council has responded by amending the Document List in the Preferred Options Report.

## 9 Glossary

**9.1** The following comment was received on the glossary:

24 Preferred Option 19 - Minerals and Preferred Option 20 - Waste Management refer

ID	Summary of Responses Received
566	"/potential" must be added, after the word "status", in the explanation to the Water Framework Directive.

**9.2** The Council has responded to this comment by amending the entry in the Glossary.

## 10 List of Contacts

A Power	Mr & Mrs G Archibald
A2 Architects Ltd	Mr & Mrs Jacques
Age Concern Wirral	Mr & Mrs L & B Bell
Ainsley Gommon Architects	Mr & Mrs Neeson
Airbus Operations Ltd	Mr & Mrs PM & UR Weston
Alinbrook Ltd	Mr A Kennaugh
Allerton Trust	Mr A Nuttall
Alpha Homes	Mr A P McArdle
Alyn Nicholls & Associates	Mr A Royle
Anchor Trust	Mr B Legan Dip TP DMS
Ancient Monuments Society	Mr Badenoch
Arena Housing	Mr Brown
Arriva North West Limited	Mr C M Brand
Athertons	Mr C P Hales
Atisreal Limited	Mr C R Hutchinson
Axis Planning Environment & Design	Mr C S Thompson
Barnston Conservation Society	Mr C T Moore
Barnston Womens Institute	Mr C W Dent BA Dip TP RIBA MRTPI
Barratt Chester	Mr Cambell
BE Group	Mr Casement
Bebington Centre for Voluntary Service	Mr D Birkett
Beechwood & Ballantyne EMB Ltd	Mr D Clamp
Beechwood Community Association	Mr D Cross
Bell Developments Ltd	Mr D McKaigue

Bellway Homes	Mr D Nooman
Bett Limited	Mr D Taylor
Bidston Preservation Trust	Mr Davies
Bidston Residents Association	Mr E J Norton
Bidston Village CAAC	Mr F Burgana BA MCD MRTPI
Biffa Waste Services	Mr F Howell
Birkenhead Market Tenants Association	Mr F Hyde
Birkenhead Town Centre Forum	Mr G Bryan
Birkenhead YMCA	Mr G D Evans
Black Macadam	Mr G Ellison
Bloomfields Limited	Mr G Noble
Blue Sky Planning Limited	Mr G S Nagra
Bluemantle Ltd	Mr Gorman
BNP Paribas Real Estate	Mr Grey
Bovis Homes Limited	Mr H Turnbull
Braithwaite Associates	Mr Hogg
Bremners Solicitors	Mr Hussenbux
Bridgewater Meeting Room Trust	Mr I Coulthard
Bridscape	Mr J A Wright BA (Hons) MRTPI
Bristol-Myers Squibb Pharmaceutical Research	Mr J Barrington
British Aerospace	Mr J M Corfe
Broadway Malyan Planning	Mr J Noble
Brock Plc	Mr J O'Neil
Brockway Dunn Limited	Mr J Thompson
Brodies Solicitors	Mr Johnson
Bromborough Society	Mr K Collins
Bullivant Jones & Company	Mr L Burman
C A Planning	Mr L Parker-Davies
C D Hughes	Mr Lynchy
Caldy CAAC	Mr Lyon
Campaign for Real Ale	Mr M Curtis

# Core Strategy for Wirral - Report of Consultation on Spatial Options

Carey Jones Architects	Mr M F Lewis
Carr Gomm	Mr M G Laurenson
Cass Associates	Mr M Harrision
CB Richard Ellis	Mr M Muller
CDP Limited	Mr M Rattenshaw
CDS Housing	Mr Mahoney
Central Liscard Area Residents Association	Mr Martin
CgMs Consulting	Mr McCormick
Chelford Properties	Mr Mighall
Cheshire & Wirral Partnership NHS Trust	Mr P Barton MCD BA (hons)
Cheshire Gardens Trust	Mr P Berry
Cheshire RIGS Group	Mr P Haywood
Cheshire Wildlife Trust	Mr P Jackson
Chris Thomas Limited	Mr P McCann
Church Commissioners	Mr P Pendleton
Claire House Children's Hospice	Mr Prandle
Clatterbridge Centre for Oncology	Mr Quaile
Claughton Community Group	Mr R J Wood
Cliff Walsingham & Company	Mr R L Shelbourne
Clive Watkin Partnership	Mr R Miles
CLM Services	Mr Reade
Colin Buchanan & Partners	Mr Rowland
Colliers CRE	Mr T Rock
Contour Homes	Mr T Tarr
Corporate Property Solutions	Mr Tony Clark
Cosmopolitan Housing	Mr Van Ingen
Council for British Archaeology	Mr W Cates
Country Land & Business Association	Mr W Mitchel
Countryside Council for Wales	Mr W O'Dowd
Countryside Properties	Mr Watts
Crosby Homes NW Ltd	Mr Wilkinson

Crown Estate	Mrs B Murthwaite
Cuff Roberts Solicitors	Mrs Clarke
Cunnane Town Planning	Mrs Duncan
Cycling Project	Mrs E M Hale
D Bamber	Mrs G Nicholas
D J Cooke & Company Ltd	Mrs G Wollers
D Morgan Plc	Mrs J Andrews
D2 Planning	Mrs J M Smith
Dalton Warner Davies	Mrs K M Ives
Daly International	Mrs Lewis
David McLean Homes Limited	Mrs N L Ratcliff
David Wilson Homes	Mrs S Charlesworth
Dawn Ralph	Mrs S Shaw
De Pol Associates	Mrs V Doodson
Dee Estuary Conservation Group	Mrs Weston
Denbighshire County Council	Ms C Radford
Denis Wilson Partnership	Ms D Toony
Denton Clark & Co.	Ms E McVey
Design Planning Development	Ms Foster
Development Planning & Design Services	Ms J M McIlhatton
Devonshire Park Residents Association	Ms K Robinson
Dickinson Dees	Ms L Woodhead
Dimensions UK Limited (New Era)	Ms M Johnson
Diocese of Chester	Ms S Colquhoun
Diocese of Shrewsbury	Ms S J Wall
Disabled Motorists Federation	Ms S Magee
Dixon Webb	Ms S Sweeney
Doyle Developments	Ms Seager
DPP	Muir Associates
Dr K Singh	Multiple Sclerosis Society
Dr M A Turpin	N Power Renewables

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Dr M Baker-Schommer	Nathaniel Litchfield & Partners
Dr M Day	National Farmers Union
Dr Macbeath	National Trust
Dr R Dockrell	National Wind Power Limited
Drivers Jonas LLP	Network Rail
DTZ Piedad Consulting	New Brighton BRAVO
E M Enterprises	New Brighton Community Association
Eastham Village Preservation Association	New Brighton Community Partnership
EDAW Plc	New Brighton Environmentalists
Edmund Kirby	New Brighton Football Club
Eleanor Road Residents Association	New Ferry & Rock Ferry Conservation Society
Elite Homes (North) Limited	New Ferry Regeneration Action Group
Emerson Group	NJL Consulting
Emery Planning Partnership	Norland
Energy Projects Plus	Norman Street Residents and Tenants Association
English Churches	North Birkenhead Neighbourhood Forum
Entec UK Ltd	North Country Homes Group Limited
Envirolink Northwest	Northern Trust
Environmental Resources Management	NW & North Wales Sea Fisheries Committee
Family Housing Association	NW Association of Sea Angling Clubs
Fisher German Chartered Surveyors	NW Baptist Association
Forestry Commission	NW Confederation of Passenger Transport
Forster and Company	NW Strategic Health Authority
Fort Perch Rock	Overchurch Residents Association
Forthview Limited	Oxton Society
Forum Housing	P H Property Holdings Limited
Frankby CAAC	P Wilson & Company
Friends of Arno and Oxton Fields	Paddock Johnson Associates
Friends of Arrowe Country Park	Pareto Retail Ltd

Friends of Ashton Park	Partnership for Racial Equality
Friends of Bidston Hill	Patrick Farfan Associates Ltd
Friends of Birkenhead Park	Paul Butler Associates
Friends of Central Park	Paul Dickinson Associates
Friends of Coronation Gardens	Peacock & Smith
Friends of Dibbinsdale	Peel Holdings Limited
Friends of Eastham Country Park	Persimmon Homes (North West)
Friends of Flaybrick	Phil Major Waste Disposal Limited
Friends of Gilroy Nature Conservation Society	Phoenix House Residential Rehabilitation
Friends of Greasby Outdoor Activity & Leisure	PHP Developments Ltd
Friends of Harrison Park	Pierhead Housing
Friends of Heswall Shore	Pine Court Housing
Friends of Hilbre Nature Reserve	Planning and Environmental Services Ltd
Friends of Hoylake & Meols Gardens	Planning Bureau Limited
Friends of Leasowe Lighthouse	Planning Potential Ltd
Friends of Ness Gardens	Port Sunlight Village Society
Friends of North Wirral Coastal Park	Poulton & District Residents Association
Friends of Rock Park	Premier Brands UK Limited
Friends of Storeton Woods	PTS Property
Friends of Tam O'Shanter Urban Farm Trust	Pulford Road Residents Association
Friends of Vale Park	R G Drake
Fuller Peiser	Ramblers Association (Wirral Group)
FWT	Reclaim Our Quarry
Garden History Society	Reddington Developments Limited
Garry Usherwood Associates	Redrow Homes North Limited
Gauchwin Group	Rev Father Ostaszewski
General Aviation Awareness Council	RGB
George Wimpey North West Limited	Riverside Housing
Georgian Group	Robinson & Neal

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Gerald Eve	Robinson Architects
Gilling Dod Architects	Rock Ferry Community Partnership
Gilmore Developments Limited	Rock Park Estate Management Committee
GL Hearn	Rodney Housing Association
Goodwin Planning Services	Roger Tym & Partners
Gough Planning Services	Royal Estates
Gregor Shore	Royal Liverpool Golf Club
Grosscurth & Co	Royal National Lifeboat Institution
GroundSure Limited	RPS Planning Transport & Environment
Groundwork Merseyside	RSPB
Guardian Retirement Housing	Rural Development Service
GVA Grimley	Safety Layne (Investments) Limited
H M Jones	Salisbury Developments
Halcyon Properties	Salvation Army
Hallam Land Management Ltd	Saughall Massie CAAC
Halliwells LLP	Savills (L & P) Limited
Harlor Homes	Seacombe Local Area Partnership
Haston Reynolds Partnership	Seddon Homes Limited
Hawarden Airport (Airbus)	Servite Houses
Health & Safety Executive	Seven Waves Community Radio
Henry Boot Developments Limited	Signet Planning
Hepher Dixon	SLR Consulting Limited
Heswall & District Business Association	Smith & Sons Property Consultants
Heswall Congregation of Jehovah's Witnesses	Society for the Protection of Ancient Buildings
Heswall Society	Sommerville Primary School
Hickling Gray Associates	Spawforth Planning Consultants
Higham & Co.	St. Mary's Catholic College
HM Coastguard	Stanton Estate Residents Association
Homes and Communities Agency	Steer Davies Gleave
Hooton Park Trust	Steven Abbott Associates
Hornby Homes	Stewart Ross Associates



Hourigan Connolly  
Housing 21  
HOW Planning LLP  
Hoylake Civic Society  
Hoylake CVS  
Hylgar Properties  
Indigo Planning Limited  
Inglewood Properties  
Irby, Thurstaston & Pensby Amenity Society  
Irvin Consultants  
J Barnard  
J Bowen  
J Smith  
J10 Planning  
JMP Consulting  
Job Centre Plus  
John Millar (UK) Ltd  
Jones Lang LaSalle  
Kemp & Kemp  
Kersh Commercial  
King Sturge  
Kings Gap CAAC  
Kings Lane Supporters Association  
Knight Frank LLP  
L Masterman  
Lairdside Communities Trust  
Lambert Smith Hampton  
Lamont  
Land Planning Group  
Land Projects UK Associates  
Landmark Information Group Ltd  
Storey Sons & Parker  
Street Design Partnership  
Strutt & Parker  
Sure Start (Birkenhead Central)  
Survey & Design Associates  
Sustrans  
Taylor Wimpey UK Limited  
Taylor Woodrow Developments  
Taylor Young  
Terrence O Rourke  
Terrence Tarr  
Tetlow King Planning  
The Co-operative  
Theatres Trust  
Thermal Ceramics UK Ltd  
Thomas Estates Limited  
Thornton Hough Community Trust  
Tower Action Group  
Townswomen Wirral 101-25  
Tranmere Alliance  
Tranmere Parks  
Tranmere Together  
Transition Town West Kirby  
Tribal MJP  
Turley Associates  
Tweedale  
Twentieth Century Society  
Unichema Chemicals  
Unilever Research Port Sunlight  
Unilever UK Home and Personal Care  
Unilever UK Property

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Lawn Tennis Association	Union Street Day Resource Centre
Leasowe Community Centre	VCAW Bebington
Leasowe Community Homes	VCAW Heswall
Leith Planning Limited	VCAW Wallasey
Leverhulme Estates	Venture Housing Association
Liverpool Housing Trust	Villa Medical Centre
MacIntosh Communications Limited	Wainhomes (Developments) Limited
Malcolm E Lloyd	Wallasey Civic Society
Malcolm Judd and Partners	Wallasey Village Community Partnership
Manor Egremont Mast Action Group	Welcome Home Developments
Manor Kingdom Central	Wellington Road CAAC
Maritime (Regenda Group)	West Kirby Village CAAC
Maritime Housing Association	Westwood Road Residents Association
Mason Owen Property Consultants	White Young Green
Matthews & Goodman	Williams Estate Management
McCormick Architecture	WIRED
McDyre & Co.	Wirral & Cheshire Badger Group
McInerney Homes	Wirral Association for Disability
Meols Drive Area Residents Association	Wirral Autistic Society
Mersey Basin Campaign	Wirral Barn Owl Trust
Mersey Docks and Harbour Company	Wirral Black & Racial Minority Partnership
Mersey Estuary Conservation Group	Wirral Chamber of Commerce
Mersey Estuary Development Co-ordinator	Wirral Country Park Friends Group
Mersey Waste Holdings Limited	Wirral CVS
Merseyside & West Cheshire Ramblers	Wirral Disabled Peoples Partnership
Merseyside & West Lancs Bat Group	Wirral Environmental Network
Merseyside Civic Society	Wirral Federation of Tenants & Residents Associations
Merseyside Cycling Campaign (Wirral Branch)	Wirral Fire Safety Command
Merseyside Environmental Trust	Wirral Footpaths and Open Spaces Society
Merseyside Fire Service Headquarters	Wirral Friends of the Earth

Merseyside Police	Wirral Green Belt Council
Merseytravel	Wirral Green Party
Methodist Church Property Division	Wirral Hospitals Trust
Metropolitan Resources Limited	Wirral Investment Network
Michael Cunningham Architects	Wirral Jehovah's Witnesses
Miller Town Planning	Wirral Methodist Housing Association
Miss J Marguerie	Wirral Metropolitan College
Mitsubishi Electrical Europe B.V.	Wirral Multicultural Organisation
Mobile Operators Association	Wirral Partnership Homes
Mono Consultants Ltd	Wirral PCT (Public Health Department)
Morecrofts Solicitors	Wirral Society
Morris Homes (North) Limited	Wirral Transport Users Association
Mouchel Parkman	Wirral Urban Farm Association
Mr R Neale	Wirral Victim Support
Mr & Mrs A Pasterfield	Wirral Wildlife
Mr & Mrs Arnold	Woodchurch Neighbourhood Management
Mr & Mrs D Gleave	Woodland Trust
Mr & Mrs Dunne	

## 11 List of Specific Consultation Bodies

4NW	Merseyside Policy Unit
Airwave MMO2	Merseyside Waste Disposal Authority
Bell Ingram Pipelines Ltd	Mobile Operators Association
BT	National Grid
Cheshire Association of Local Councils	Natural England
Cheshire West and Chester Council	North West Development Agency
Coal Authority	O2 UK Limited
Dwr Cymru Welsh Water	Puddington & District Council
English Heritage	Scottish Power
Environment Agency	Secretary of State for Transport
Flintshire County Council	Sefton MBC

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Fusion Online Limited	Shell UK Pipelines
Government Office for the North West	Showmens Guild of Great Britain
Halton UA	SP Manweb
Helsby Parish Council	Sport England
Home Builders Federation	St Helen's MBC
Homes and Communities Agency	T Mobile UK Ltd
Hutchinson 3G UK Limited	The Mersey Partnership
Ince Parish Council	United Utilities
Knowsley MBC	Vodafone Ltd
Liverpool City Council	Willaston Parish Council
Merseyside Archeological Service	Wirral Magistrates
Merseyside Environmental Advisory Service	Wirral Primary Care Trust
Merseyside Fire & Rescue Service	Wirral Voluntary and Community Services Network
Merseyside Police Authority	

## 12 List of Respondents

4NW	Merseyside Environmental Advisory Service
A Harrison	Merseyside Waste Disposal Authority
A McArdle	Merseytravel
A Pollard	Mobile Operators Association
Barnston Conservation Society	N Cowley
Bellway Homes Limited	N Ferguson
Bidston Preservation Trust	N Sandford
Birkenhead School	N Spencer
Biston Village CAAC	National Grid
Bromborough Society	National Trust
C Moore	Natural England
CEREP Grosvenor Sarl	Network Rail
Cheshire West and Chester Council	New Brighton Partnership
Claughton Community Group	North West Development Agency

Clive Watkin Partnership	Oxton Society
Coal Authority	P Betts
Councillor P Gilchrist	Peel Energy
Countryside Council For Wales	Peel Holdings
D Allan	R Neale
D Bentley	Roland Smith Limited
D Wade	S Charlesworth
Derwent Holdings	S Davies
Disabled Motorists Federation	S Poole
E Davey	S Winsford
E Fewtrell	Sainsbury's Supermarkets
Eastham Village Preservation Association	Seacombe Local Area Partnership
Emerson Group	Seaview Meadows Sustainable Planning
English Heritage	Sport England
Environment Agency	T Fergusson
Frankby CAAC	T Roberts
Friends of Central Park	T Rock
Friends of Hoylake & Meols Gardens	Testo
G Reade	The Mersey Partnership
Government Office North West	Theatres Trust
Grosvenor Liverpool Fund	Transition Town Initiatives
Heswall Society	United Utilities
Hoylake and District Civic Society	Universities Superannuation Scheme
Hoylake Village Life	V Curtis
Irby Thurstaston and Pensby Amenity Society	Vyner Estate
J Brace	W Cates
J Hutchinson	Walmsley
J Marguerie	Warner Estate Holdings
J McIlhatton	West Kirby Working Group
J Noble	Wirral Council Economic Projects
J O'Neil	Wirral Council Special Initiatives

# Core Strategy for Wirral - Report of Consultation on Spatial Options

J Owen

J Thompson

J Woods

Knowsley MBC

Leverhulme Estates

Liscard and Egremont Partnership

Liverpool City Council

M Campbell

M Gordon

Wirral Fire Safety Command

Wirral Green Belt Council

Wirral Jehovah's Witnesses

Wirral NHS Trust

Wirral Partnership Homes

Wirral Society

Wirral Wildlife

Wm Morrison Supermarkets

Y Salisbury