



LOCAL DEVELOPMENT FRAMEWORK FOR WIRRAL

CORE STRATEGY LOCAL PLAN

PROPOSED SUBMISSION DRAFT

SUMMARY OF INITIAL RECOMMENDED RESPONSES

JULY 2013

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Background

Summary of Comments Received	Recommended Response
Picture 2.1 clearly demonstrates that 'all roads' lead to Liverpool, that Wirral is a commuter /dormitory area for Liverpool and that it is difficult to consider Wirral without Liverpool for jobs and housing as part of the greater Liverpool City Region. How has the Council incorporated the views of the Liverpool City Region and the Local Nature Partnership, and what changes did this interaction create in the Core Strategy?	No Change is recommended. The Council has a legal duty to cooperate with Liverpool City region partners and a duty to have regard to the activities of the Local Nature Partnership. The views of Liverpool City Region partners have been incorporated at each stage of the Core Strategy but the Local Nature Partnership has only recently been established. A written record of interaction will be provided alongside the modified Core Strategy before it is submitted to the Secretary of State.
Support the identification of linkages between Wirral and Ellesmere Port and Chester.	No change is recommended.
Questions the calculation of the population increase used in Paragraph 2.3	No change is recommended. 2001 Census population was 312,293 rising to 319,800 2011, 2.4% increase.
Questions the calculation of the increase in households which is quoted as 7,500 in paragraph 2.3.	The Census figure for households was 133,345 in 2001 rising to 140,583 in 2011, an increase of 7,238 households. It is, therefore, recommended that paragraph 2.3 is amended to read: "The population grew by 2.4 percent and by <u>7,300</u> households between 2001 and 2011.
Whilst appreciating the need to shorten the Core Strategy, the expected population and age profile is now relegated to the Spatial Portrait. Surely this information is fundamental to the Core Strategy. There is no strategy to address the needs of the increasingly aged population.	No change is recommended. The Core Strategy is intended to make provision for all age groups. The housing needs of particular age groups will be addressed in the review of the council's Strategic Housing Market Assessment through Policy CS18 – Housing Requirement, Policy CS22 – Affordable Housing Requirements and Policy CS23 – Criteria for Specialist Housing. Policy CS43 – Design Heritage and Amenity provides for all new development be designed to allow people of different ages and abilities to move around without difficulty including provision for tourism, recreation and leisure.

Spatial Vision

Summary of Comments Received	Recommended Response
The plan period should be extended to 2031. Paragraph 157 of the NPPF states that local plans should be drawn up over a 15-year time horizon, where possible, and paragraph 47 of the NPPF states that local planning authorities should identify a supply of specific, developable sites or broad locations, for years 11-15. Any time period should also include the time needed to prepare subsequent site specific Local Plans.	No change is recommended, at this stage, although the plan period will be rolled forward to ensure a 15-year time frame from the date of adoption, in line with national policy.
The Spatial Vision fails to consider how other parts of Wirral, particularly in the west, can contribute towards future prosperity and meeting development needs. There are local needs in all parts of Wirral that have to be addressed.	No change is recommended. The Spatial Vision continues to set out an appropriate statement of the Council's priorities for the Borough. The focus on regeneration will not prevent appropriate development from taking place in other areas of the Borough.
The Spatial Vision is over-reliant on delivering future housing and employment in "The Borough's existing urban areas," instead of spreading growth more evenly across the urban and rural areas including Raby, Thornton Hough, Brimstage, Storeton and Barnston, to secure managed rural growth in sustainable locations. Paragraph 7 should be extended to include the promotion of housing, tourism and employment in rural areas, in line with NPPF paragraph 17.	No change is recommended. Paragraph 17 of the NPPF states that plan making should "take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it." Providing for an efficient and productive agricultural economy is still a valid objective for the rural areas and growth in sustainable tourism is provided for in paragraph 6 of the Spatial Vision and in Policy CS2 – Broad Spatial Strategy. Policy CS3 – Green Belt and national Green Belt controls provide for appropriate levels of development within the Green Belt.
Support the general thrust of the Spatial Vision and the focus on regeneration, housing market renewal in the east and the development of Birkenhead Dock estate to create a sustainable, mixed-use waterside community and the role of ports in driving economic regeneration, but the Spatial Vision is not aspirational enough and does not proactively drive and support sustainable economic development or reflect the scale of opportunity at Wirral Waters. The Core Strategy should be a more promotional document. Wirral Waters should be more visible as the single most important project in Wirral and as one of the most significant within the City Region.	The Core Strategy is a land use development plan and is not intended to be a marketing document for any one particular development. Paragraph 4 of the Spatial Vision currently reads: "A new city neighbourhood will be being established within the Birkenhead Dock Estate to create a sustainable, mixed-use waterside community, where new homes and a wide range of employment, education, leisure, community and cultural uses will create a new impetus for economic growth and regeneration at the heart of the older urban area." Wirral Waters forms a prominent part of Policy CS4 – Priorities for Wallasey; Policy CS5 – Priorities for the Commercial Core; Policy CS6 – Priorities for Suburban Birkenhead; is clearly shown on the Key Diagram; and Policy CS12 – Wirral Waters clearly sets out the scale and type of development that will be supported.

Summary of Comments Received	Recommended Response
<p>Paragraph 1 of the Spatial Vision should be amended to read: "By April 2028, Wirral will offer a high quality of life, as an attractive place to live an active, sustainable, productive, safe and healthy lifestyle, to complement the attractiveness and <u>making a significant contribution to the</u> economic competitiveness of <u>a thriving and prosperous wider sub-region led by major new development within the east of the Borough.</u>"</p>	<p>The deletion of "continue" from the first line of paragraph 1 of the Spatial Vision would imply that Wirral does not currently offer a high quality of life. The reference to major new development within the east of the Borough would unduly narrow the scope and focus of the Vision. It is therefore recommended that paragraph 1 of the Spatial Vision is amended to read: "By April 2020 Wirral will continue to offer a high quality of life, as an attractive place to live an active, sustainable productive, safe and healthy lifestyle, to complement the attractiveness of and <u>make a significant contribution to the</u> economic competitiveness of <u>the Liverpool City Region.</u>"</p>
<p>Regeneration in inner Wirral should not be to the exclusion of development in other parts of the Borough. The Spatial Vision should not pre-judge the need or otherwise to release land in the Green Belt and any reference to maintaining a tight Green Belt in the Spatial Vision is unnecessary and unjustified, given the inclusion of Policy CS20 – Housing Contingencies.</p>	<p>No change is recommended, as the principle of maintaining a tight Green Belt to support regeneration will remain valid, even if Policy CS20 – Housing Contingencies, needs to be applied. The existing wording of the Spatial Vision and of Policy CS2 – Broad Spatial Strategy will not prevent appropriate development from taking place in other areas of the Borough.</p>
<p>Paragraph 2 of the Spatial Vision should be amended to delete "The focus of new development and investment will be on improving and regenerating the Borough's existing urban areas..." and to read: "<u>Significant emphasis will be placed on improving the</u> existing urban areas..."</p>	<p>The suggested amendments to paragraph 2 of the Spatial Vision would potentially dilute the focus of the Vision and remove the reference to regeneration. It is therefore recommended that paragraph 2 of the Spatial Vision is only amended to read: "The focus of new development and investment will be on improving and regenerating the Borough's existing urban areas. <u>Significant emphasis will be placed on</u> tackling social, health, economic and environmental disparity; re-using existing buildings and previously developed land; and on strengthening and enhancing the distinctive assets of the Borough, including the quality and value of the Borough's historic, built and natural environment; supported by a tight Green Belt to focus development into the existing built-up area and achieve a sustainable pattern of development."</p>
<p>The Spatial Vision has not changed significantly in a period when housing completions have continued to decline. A focus on regeneration areas will not deliver the housing that is needed. The assumption that a tightly drawn Green Belt will direct investment into the inner urban area is misplaced, as all that will result is that completions will continue to fall well short of (robustly-assessed) housing needs.</p>	<p>No change is recommended. The decline in completions reflects a change in market conditions which is now affecting market demand and the Spatial Vision continues to set out an appropriate statement of the Council's priorities for the Borough. The forthcoming Strategic Housing Market Assessment and Core Strategy Viability Study will determine the Council's position in relation to future housing need and the pattern of viable development.</p>

Summary of Comments Received	Recommended Response
<p>The Spatial Vision has not fundamentally changed. There is no 'Plan B' for the over reliance on the former Newheartlands Pathfinder and Wirral Waters. The plan period to 2028 should be extended to 2030 as there is little chance of this Core Strategy being adopted and found sound much before 2015.</p>	<p>No change is recommended, as the Spatial Vision continues to set out an appropriate statement of the Council's priorities for the Borough. Policy CS19 – Housing Implementation Plan and Policy CS20 – Housing Contingencies and measures in the Proposed Core Strategy Monitoring Plan now provide a contingency against actual future performance.</p>
<p>Paragraph 3 of the Spatial Vision should be amended to read: "The housing market within the older urban areas in east Wirral, previously designated as part of the Newheartlands Pathfinder, will be <u>transformed into a series of thriving, sought after neighbourhoods through the delivery of unprecedented levels of new high quality residential development. The area will be competing on an equal footing with outlying residential areas and large areas of older stock, particularly in Birkenhead, Seacombe and Tranmere, will have been improved and replaced.</u>"</p>	<p>It is accepted that the aim is to transform the housing market in these areas. It is therefore recommended that paragraph 3 of the Spatial Vision is amended to read: "The housing market within the older urban areas in east Wirral, previously designated as part of the Newheartlands Pathfinder, will be <u>transformed</u>, competing on a more equal footing with outlying residential areas and large areas of older stock, particularly in Birkenhead, Seacombe and Tranmere, will have been improved and replaced."</p>
<p>Paragraph 4 of the Spatial Vision should be deleted and placed higher up to be the second paragraph within the Vision, with amended wording to give Wirral Waters greater prominence and to better reflect its component parts, to read: "<u>New development will be prioritised in areas where it can deliver transformational change in the Borough's economy and regeneration prospects. There will be a specific focus on the major redevelopment of the Birkenhead/Wallasey Dock Estate to deliver a high quality mixed-use waterside destination comprising a series of integrated City Neighbourhoods providing new homes, commercial development, ancillary and destination retail and leisure facilities, cultural attractions and Western Europe's first International Trade Centre. The Council will work with key partners to deliver the scheme and ensure it realises its full potential in transforming and diversifying the economy of Wirral and playing a key role in supporting the growth of the Liverpool City Region and its national and international competitiveness.</u>"</p>	<p>The existing wording and position of paragraph 4 of the Spatial Vision adequately captures the Council's intentions for the redevelopment of the Dock Estate and its contribution towards the delivery of the Council's wider objectives. The suggested wording is excessively detailed for a Spatial Vision. The proposed reference to transformational change is not geographically specific. Reference to a specific project is inappropriate within the Spatial Vision and reference to a 'destination' is unnecessary. The inclusion of a policy statement is also inappropriate. It is therefore recommended that paragraph 4 of the Spatial Vision is only amended, to better reflect the scope of the existing planning consent, to read: "A new city neighbourhood will be being established within the Birkenhead Dock Estate to create a sustainable, mixed-use waterside community, where new homes and a wide range of employment, education, <u>retail</u>, leisure, community and cultural uses will create a new impetus for economic growth and regeneration at the heart of the older urban area" and that an additional paragraph is added to the supporting text to provide extra description and clarify the role of Wirral Waters in the delivery of the Spatial Vision.</p>

Summary of Comments Received	Recommended Response
Paragraph 6 of the Spatial Vision should refer to other biodiversity assets as well as European Sites and their supporting habitats.	Accepted. It is recommended that paragraph 6 of the Spatial Vision is amended to read: "A growth in sustainable tourism will be focused on the quality of the Borough's natural environment; built heritage; country parks; and coastline, with appropriate visitor facilities at Birkenhead, New Brighton, Leasowe, Hoylake, West Kirby, Thurstaston and along the Mersey coast, managed to avoid harm to European Sites, <u>their supporting habitats and other biodiversity assets.</u> "
"Supporting habitats" should be defined and mapped as soon as possible.	Accepted but no change are recommended, as supporting habitats will be identified as part of the evidence base for the preparation of a site-specific Local Plan, in line with the conclusions of the Core Strategy Habitats Regulations Assessment. Existing wording throughout the Core Strategy will already allow supporting habitats to be protected where appropriate evidence can be provided.
The reference in paragraph 8 of the Spatial Vision should be amended to include the increased use sustainable freight transport.	Accepted. It is recommended that paragraph 8 of the Spatial Vision is amended to read: "Development and investment will have supported and encouraged a more sustainable pattern of development and travel that will have reduced emissions; improved air quality; increased the use of public transport <u>and sustainable freight transport</u> ; and made greater use of alternative forms of transport such as walking and cycling; and there will be a greater emphasis, across all sectors, on securing sustainable approaches to design and construction; green infrastructure; energy; water; flood risk, waste management; carbon impact; local employment and production; and mitigation, adaption and resilience to climate change."
Consideration should be given to the potential negative impacts of this strategy on health. Focusing economic growth on existing employment areas could increase traffic, noise and air pollution for local residents. Increasing development in the more deprived areas of the Borough could increase road traffic accidents. Maintaining the Green Belt only benefits people who are able to make use of it. It is important to ensure local greenspaces within areas of deprivation are also preserved. Creating local employment opportunities could improve local worklessness but not if jobs are taken by those from outside the area, which could result in increased commuting and additional traffic with an overall negative impact on local residents.	No change is recommended. The impact on healthy communities has been addressed in the Sustainability Appraisal of the Spatial Vision, which identified a likely positive long term permanent effect on the objective relating to healthy communities. The Spatial Vision already directly refers to tackling health disparity, with clear benefits to be achieved through improved housing stock, reduction in fuel poverty and achieving equality in housing choice.

Summary of Comments Received	Recommended Response
The word 'significant' should be used in the final line of the Spatial Vision, to allow progress in the transition to a low carbon Borough to be measured.	No change is recommended, as paragraph 3.4 of the supporting text provides an indication of the extent of emissions reductions which would be required to meet national targets and the monitoring of carbon emissions is already proposed under indicator CSM49 in the Draft Core Strategy Monitoring Plan.
The Spatial Vision should be more explicit in its support for safeguarding, enhancing and expanding key port facilities and should make specific reference to Port Wirral; QEII Dock; rationalising and consolidating Birkenhead Docks to support Wirral Waters; and Cammell Lairds.	No change is recommended, as Paragraph 5 of the Spatial Vision already states that “Sustainable economic regeneration will be being driven by the major economic hubs of Birkenhead, Bromborough and the Ports...” Policy CS16 – Criteria for Port-Related Development, clearly specifies that “Port and marine related development will be permitted within the existing Dock Estates at Birkenhead and Eastham; at Twelve Quays; along the Tranmere waterfront at Cammell Lairds; and along the Bromborough Coast...”

Strategic Objective 1 – Economic Revitalisation

Summary of Comments Received	Recommended Response
Strategic Objective 1 is supported but should encourage business and enterprise in its widest sense to improve the economic prospects of the Borough and not restrict uses within existing employment areas to those falling within Use Classes B1, B2 and B8, which will compromise business, enterprise and job creation to the detriment of the revitalisation of the economy.	No change is recommended as Strategic Objective 1 is not restricted to B1, B2 and B8 uses only and is consistent with national policies to support economic growth.
Strategic Objective 1 should be re-worded to: “support economic growth, <u>encourage enterprise and job creation that will contribute to economic activity</u> in east and central Wirral <u>in particular</u> and the Borough’s existing town, district and local centres”, to replace the reference to “a higher density of jobs and businesses within the existing employment areas”.	Strategic Objective 1 as currently drafted supports economic growth in the most accessible locations to help to tackle worklessness and low incomes. Strategic Objective 1 accurately reflects the primary objective of the Council's Investment Strategy to raise Wirral's business density to the North West average. References to job and business density should therefore be retained. It is, however, recommended that Strategic Objective 1 is amended to read: “To support economic growth and a higher density of jobs and businesses <u>particularly</u> within the existing employment areas in east and central Wirral and the Borough’s existing town, district and local centres” to better reflect the Council’s aspirations for economic growth.
Strategic Objective 1 does not acknowledge that the economic revitalisation of existing employment areas such as Moreton can only be delivered if viable. National policy requires policies to be flexible to allow for changes in economic circumstances. Strategic Objective 1 is inflexible and effectively seeks to maintain the 'status quo' and should be re-drafted to make specific reference to only achieving economic revitalisation at viable locations.	No change is recommended as supporting economic growth in existing employment areas is still an appropriate objective. The Wirral Employment Land and Premises Study included a general assessment of the continued attractiveness, suitability and viability of all the Borough’s existing employment areas and a selection of available sites within them to identify an Employment Area Hierarchy. Policy CS17 – Protection of Employment Land provides for site specific assessments where evidence relating to need, marketing and viability can be taken into account.
The reference to east and central Wirral should reflect the Settlement Areas to prevent the use of differing layers of geography.	No change is recommended as at this point in the document the Settlement Areas have not yet been defined and Policies CS4 to CS11 are intended to reflect the delivery of the Strategic Objectives and not visa versa.
Support Strategic Objective 1 provided the New Brighton Waterfront scheme is formally protected and designated as part of a newly defined New Brighton Town Centre.	No change is recommended to the Strategic Objective as this issue is dealt with through Policy CS25 – Hierarchy of Retail Centres.

Summary of Comments Received	Recommended Response
<p>Strategic Objective 1 should be replaced to read: <u>“To deliver transformational economic growth and diversification within the Borough driven by high levels of development within east Wirral and particularly within the Wirral Waters Strategic Location’ to reflect the scale of opportunity available and the Council’s ambition for economic growth.”</u></p> <p>The emphasis should be on economic 'transformation' rather than 'revitalisation' and on 'delivering' and 'driving' rather than just 'supporting' economic growth.</p>	<p>No change is recommended. The existing objective seeks 'To support economic growth and a higher density of jobs and businesses within the existing employment areas in east and central Wirral and the Borough's existing town, district and local centres', with a wider and more qualified geographical emphasis. The Council's Enterprise Strategy (part of the Wirral Investment Strategy) contains a specific target to raise Wirral's business density to the North West average which is easier to measure and monitor. Wirral Waters is part of an existing employment area in east Wirral and would therefore still be supported under the existing objective.</p>

Strategic Objective 2 – Housing Regeneration

Summary of Comments Received	Recommended Response
Strategic Objective 1 is supported but should encourage business and enterprise in its widest sense to improve the economic prospects of the Borough and not restrict uses within existing employment areas to those falling within Use Classes B1, B2 and B8, which will compromise business, enterprise and job creation to the detriment of the revitalisation of the economy.	No change is recommended as Strategic Objective 1 is not restricted to B1, B2 and B8 uses only and is consistent with national policies to support economic growth.
Strategic Objective 1 should be re-worded to: “support economic growth, encourage enterprise and job creation that will contribute to economic activity in east and central Wirral in particular and the Borough’s existing town, district and local centres”, to replace the reference to “a higher density of jobs and businesses within the existing employment areas”.	Strategic Objective 1 as currently drafted supports economic growth in the most accessible locations to help to tackle worklessness and low incomes. Strategic Objective 1 accurately reflects the primary objective of the Council's Investment Strategy to raise Wirral's business density to the North West average. References to job and business density should therefore be retained. It is, however, recommended that Strategic Objective 1 is amended to read: “To support economic growth and a higher density of jobs and businesses particularly within the existing employment areas in east and central Wirral and the Borough’s existing town, district and local centres” to better reflect the Council’s aspirations for economic growth.
Strategic Objective 1 does not acknowledge that the economic revitalisation of existing employment areas such as Moreton can only be delivered if viable. National policy requires policies to be flexible to allow for changes in economic circumstances. Strategic Objective 1 is inflexible and effectively seeks to maintain the 'status quo' and should be re-drafted to make specific reference to only achieving economic revitalisation at viable locations.	No change is recommended as supporting economic growth in existing employment areas is still an appropriate objective. The Wirral Employment Land and Premises Study included a general assessment of the continued attractiveness, suitability and viability of all the Borough’s existing employment areas and a selection of available sites within them to identify an Employment Area Hierarchy. Policy CS17 – Protection of Employment Land provides for site specific assessments where evidence relating to need, marketing and viability can be taken into account.
The reference to east and central Wirral should reflect the Settlement Areas to prevent the use of differing layers of geography.	No change is recommended as at this point in the document the Settlement Areas have not yet been defined and Policies CS4 to CS11 are intended to reflect the delivery of the Strategic Objectives and not visa versa.
Support Strategic Objective 1 provided the New Brighton Waterfront scheme is formally protected and designated as part of a newly defined New Brighton Town Centre.	No change is recommended to the Strategic Objective as this issue is dealt with through Policy CS25 – Hierarchy of Retail Centres.

Summary of Comments Received	Recommended Response
<p>Strategic Objective 1 should be replaced to read: <u>“To deliver transformational economic growth and diversification within the Borough driven by high levels of development within east Wirral and particularly within the Wirral Waters Strategic Location’ to reflect the scale of opportunity available and the Council’s ambition for economic growth.”</u></p> <p>The emphasis should be on economic 'transformation' rather than 'revitalisation' and on 'delivering' and 'driving' rather than just 'supporting' economic growth.</p>	<p>No change is recommended. The existing objective seeks 'To support economic growth and a higher density of jobs and businesses within the existing employment areas in east and central Wirral and the Borough's existing town, district and local centres', with a wider and more qualified geographical emphasis. The Council's Enterprise Strategy (part of the Wirral Investment Strategy) contains a specific target to raise Wirral's business density to the North West average which is easier to measure and monitor. Wirral Waters is part of an existing employment area in east Wirral and would therefore still be supported under the existing objective.</p>

Strategic Objective 3 – Transport Accessibility

Summary of Comments Received	Recommended Response
Strategic Objective 3 should be reworded to read: "To promote sustainable travel and direct new development to locations with easiest access to, <u>or which can be made to be within easy access of</u> , existing centres, high-frequency public transport corridors, pedestrian and cycle routes <u>and to support new sustainable transport infrastructure required to enable new development to achieve this</u> ", as it may not always be possible to direct development to the most accessible areas and directing development to areas which can be made to be accessible is equally sustainable.	Accepted but a simplified wording is recommended to read: "To promote sustainable travel and direct new development to locations <u>which will provide</u> easiest access to existing centres, high-frequency public transport corridors, pedestrian and cycle routes."
Support the Strategic Objective 3 but paragraph 4.9 should be revised to say: 'The intention of Strategic Objective 3 is to ensure that new development is located with easy access to <u>designated town, district and local centres and</u> regular and frequent public transport; to support the vitality of local centres; provide a realistic choice of means of transport to jobs, leisure, <u>retail</u> and services'; The changes would properly reflect the Borough's retail hierarchy and acknowledge the importance of retailing.	Accepted, it is recommended that paragraph 4.9 is amended to read: "The intention of Strategic Objective 3 is to ensure that new development is located with easy access to <u>designated town, district and</u> local centres and regular and frequent public transport; to support the vitality of <u>existing</u> centres; provide a realistic choice of means of transport to jobs, leisure, <u>retail</u> and services, reduce emissions minimise journey lengths; and reduce the need to travel."
Support Strategic Objective 3 but paragraphs 4.9 – 4.11 should state that any housing growth should be located within a 10 minute walking distance of public transport nodes such as the A41 corridor or the Wirral Line of the Merseyrail network to maintain and good access to Birkenhead, Liverpool, Ellesmere Port, Chester and the M53 Motorway.	No change is recommended as the existing supporting text already clearly encourages development to be located with easy access to public transport and paragraph 6.4 already defines an easy walking distance as within 400 metres.

Strategic Objective 4 – Neighbourhood Services

Summary of Comments Received	Recommended Response
Strategic Objective 4 should be revised to read: “To support the provision of shops, services, cultural, health and community facilities to meet the needs of local communities first within and then at <u>well-connected edge-of centre sites where suitable and viable in centre sites are not available. Only if suitable in and edge sites are not available will accessible out of centre sites be considered</u> ” to ensure consistency with National policy.	No change is recommended as the suggested wording would turn Strategic Objective 4 it into a policy and duplicate Policy CS29 – Criteria for Edge-of-Centre and Out-of-Centre Facilities and supporting the provision of essential facilities within easy reach of local communities remains an appropriate objective.
Strategic Objective 4 should be reworded to read: “To support the provision of shops, services, cultural, health and community facilities to meet the needs of local communities first within and then at the edge of existing centres, within easy reach of local communities, <u>including as part of major new residential and economic development where commensurate with the scale of development</u> ”, to allow shops and other facilities to meet community needs to be provided as part of major new development proposals, where needed.	Accepted but a simplified wording is recommended to read: “To support the provision of shops, services, cultural, health and community facilities <u>within</u> easy reach of local communities.”
The reference to local centres paragraph 4.12 should be changed to refer to “designated town and district centres” to better reflect the Borough’s retail hierarchy.	Accepted, it is recommended that paragraph 4.12 is amended to read: “The intention of Strategic Objective 4 is to strengthen and retain a thriving network of <u>town, district and</u> local centres...”

Strategic Objective 5 – Environmental Quality

Summary of Comments Received	Recommended Response
Support Strategic Objective 5 but concerned at the lack of access to a dedicated Archeological Officer when determining planning applications.	No change is recommended because access to a dedicated archeological officer is not a matter for the Core Strategy and the Council has access to specialist archeological advice through its existing conservation staff.
Concerned that heritage may be demoted to a supplementary planning document which would not carry the same weight as the Development Plan.	No change is recommended, as paragraph 4.18 specifically refers to the preparation of a Heritage Local Plan, which will carry the same weight as the Core Strategy once adopted.
Biodiversity is not mentioned in any of the Strategic Objectives, and environmental assets are not defined.	No change is recommended to Strategic Objective 5 which refers to ensuring “that development will preserve and enhance locally distinctive characteristics and assets”. Paragraph 4.16 already specifically refers to “wildlife”, paragraph 4.17 to supporting the findings of the Wirral Biodiversity Audit and it is clear from other policies, particularly Policy CS33 – Biodiversity and Geodiversity, that biodiversity will be protected and enhanced by the Core Strategy. The range of other environmental assets is also clear from the supporting text and the scope of other policies in the Core Strategy.
The words "and other biodiversity, geodiversity and heritage assets", should be added to Strategic Objective 5 and/or to paragraph 4.16	No change is recommended, as Strategic Objective 5 already refers to preserving and enhancing locally distinctive characteristics and assets and paragraph 4.16 already highlights the national policy expectation for planning policies to conserve and enhance the natural, built and historic environment and to protect open space, wildlife, geodiversity and landscape.
It should be made clearer that biodiversity=nature=wildlife, and geodiversity=earth science, as these terms are used interchangeably throughout the Core Strategy.	No change is recommended to Strategic Objective 5 or the supporting text, as the terminology used in regard to the natural environment is considered to be understandable to the general public. The use of terminology has however been addressed in recommendations for modifications to other Core Strategy policies supported by amended entries in the Glossary.

Strategic Objective 6 – Flood Risk

Summary of Comments Received	Recommended Response
<p>The words "<u>Preventative measures to reduce flooding will be encouraged such as the re-naturalisation of suitable watercourses</u>" should be added to Strategic Objective 6, Strategic Objective 7, paragraph 4.19 or paragraph 4.22.</p>	<p>No change is recommended, as the suggested additional wording would be overly detailed for a strategic objective and would duplicate more detailed policies elsewhere within the Core Strategy. Flood reduction measures and the management of river corridors are for example addressed through Policy CS30 – Requirements for Green Infrastructure, supported by Policy CS33 - Biodiversity and Geodiversity and Policy CS34 - Flood Risk and Coast Protection .</p>

Policy CS1 – Presumption in Favour of Sustainable Development

Summary of Comments Received	Recommended Response
Cannot support a definition of Sustainable Development that would allow the loss of agricultural land or land that could be put to agricultural production, as the UK is heavily dependant on competing for food on the international market.	No change is recommended, as Policy CS1 is a reproduction of the model policy produced by the Planning Inspectorate to meet the expectations of national policy, that must now be included in all local plans (NPPF paragraph 122 refers). Policy CS2 – Broad Spatial Strategy, supports “the beneficial use of the best and most versatile agricultural land” and “providing for local food production and food security” and Policy CS11 – Priorities for the Rural Areas, identifies “the beneficial and productive use of best and most versatile agricultural land for food production” as a priority within the rural areas.
Concerned at any move to cheaper 'green field' development over existing brown field sites in developed areas with associated infrastructure and facilities. The Council must 'level the playing field' to make renovation and re-use as attractive as green field development.	No change is recommended, as the National Planning Policy Framework referred to in Policy CS1 already encourages “the effective use of previously developed (brown field) land” and to “prefer land of lesser environmental value” (NPPF paragraph 17 refers). Elsewhere within the Core Strategy, Policy CS2 – Broad Spatial Strategy seeks “to ensure that full and effective use is made of land within the urban areas” and that “neglected, unused or derelict land or buildings are brought into use” and Policy CS19 – Housing Implementation Plan seeks to prioritise the use of previously developed sites for new housing.
Sustainable development should be defined in the text.	No change is recommended, as the UN definition of sustainable development, the UK's five 'guiding principles' and the three dimensions of sustainable development are set out in the National Planning Policy Framework, referred to Policy CS1 (NPPF, paragraph 6-10) and national policy does not require local plans to repeat this definition. Paragraph 5.2 of the Core Strategy indicates that the remaining policies in the Core Strategy set out the Council's view of what a sustainable pattern of development should look like in Wirral and a series of local sustainability objectives are also set out in Section 30 of the Core Strategy.
Paragraph 5.2 refers to "positive growth" without further definition. Growth in resource use and waste production, including greenhouse gases, is not sustainable. It would be better to delete the words "...about positive growth and..."	No change is recommended, as the ministerial forward to the National Planning Policy Framework specifically states that ‘sustainable development is about positive growth’.
National Policy is too influenced by conditions in South East England and is doubtfully "sound" when applied to Wirral.	No change is recommended, as the Council is under a legal duty to have regard to national policy and the Core Strategy will need to be tested for its consistency with national policy at public examination.

Policy CS2 – Broad Spatial Strategy

Summary of Comments Received	Recommended Response
Support the emphasis on urban regeneration and east Wirral, but paragraph 1 of Policy CS2 should be reworded to read: “The Local Planning Authority will pursue a strategy of urban regeneration, <u>economic growth and environmental enhancement...</u> ”	Accepted. It is recommended that paragraph 1 of Policy CS2 is amended to read: “The Local Planning Authority will pursue a strategy of urban regeneration, <u>economic growth</u> and environmental enhancement...”
Policy CS2 would benefit from a clearer description of the 'older urban areas'.	Accepted. It is recommended that Policy CS2 is amended to read: “The older urban areas in east Wirral, <u>previously designated as part of the NewHeartlands Pathfinder...</u> ”, to reflect the terminology already used in the Spatial Vision.
Policy CS2 should be supported by a detailed plan identifying areas of greatest need and how they have been defined. The boundaries should take more account of existing land uses where boundaries of development sites are not wholly within an area of greatest need.	No change is recommended. Areas of greatest need are defined in the Glossary as geographical areas falling within the lowest 20% of scores within the national index of multiple deprivation for England, which is a robust and well-established basis for highlighting areas where regeneration needs to be prioritised. Further information, including detailed mapping, is set out within the accompanying Spatial Portrait. The position of individual sites will need to be considered on a case by case basis, as proposals are brought forward for consideration.
Paragraph 2 of Policy CS2 should be reworded to read: “The <u>Council's</u> priority will be to <u>deliver the mixed use development of the Wirral Waters Strategic Location, providing a focus for job, housing and population growth and reflecting a strategy of marrying opportunity with need. More widely development will be directed to other areas</u> of greatest need of physical, social, economic and environmental regeneration, particularly within the <u>established</u> urban areas of east Wirral.”	Paragraph 2 of Policy CS2 currently states that “The first priority will be to focus job, housing and population growth to areas of greatest need of physical, social, economic and environmental regeneration, particularly within the older urban areas of east Wirral.” The proposed wording would dilute the commitment to all areas of greatest need and to the older urban areas, of which Wirral Waters forms part. Explicit support for Wirral Waters is included within Policy CS12 – Wirral Waters. It is therefore recommended that paragraph 2 of Policy CS2 is only amended to read: “The <u>priority</u> will be to...”
Development outside the priority areas should be restricted to that which fulfils an evidenced local need.	No change is recommended, as the national presumption in favour of sustainable development would no longer permit a restrictive approach to be applied, unless specific policies in the National Planning Policy Framework indicate that development should be restricted (NPPF, paragraph 14 and footnote 9).

Summary of Comments Received	Recommended Response
The reference to medium to high density development within areas of greatest need is too prescriptive and does not reflect the national requirement to achieve viable mixed-use developments. Densities should have regard to locational characteristics and should not be pre-determined by the Council.	No change is recommended, as Policy CS2 only states that “medium to higher density development will normally be permitted”, rather than required and the emphasis is on making “a positive contribution to local character and amenity”.
Paragraph 5 of Policy CS2 is inflexible and predetermines and protection of existing employment sites at Moreton without any robust assessment of their economic, viability and deliverability. Employment sites should not be protected where there is no reasonable prospect of the site being used for that purpose. The Wirral Employment Sites and Premises Study has not assessed every site that might be available.	No change is recommended. Policy CS2 is not site specific. The Wirral Employment Sites and Premises Study included a general assessment of the likely continued attractiveness, suitability and viability of all the Borough’s existing employment areas and a selection of available sites within them to identify an Employment Area Hierarchy. Policy CS17 provides for site-specific assessments where evidence relating to need, marketing, land supply and land use and the character of the surrounding area can be provided.
Paragraph 5 of Policy CS2 should read: “The primary focus for new jobs to <u>drive forward</u> the economic <u>transformation</u> of the Borough <u>and support the economic transformation of the City Region</u> will be the <u>Wirral Waters Strategic Location (part of the wider Mersey Waters Enterprise Zone)</u> . <u>Other priority areas for new jobs will be...</u> ” as the primary focus for new jobs should be at Wirral Waters rather than just the Mersey Waters Enterprise Zone.	The proposed wording would delete the focus on areas outside Wirral Waters. It is therefore recommended to amend paragraph 5 of Policy CS2 to read: “The primary focus for new jobs to <u>drive forward</u> the economic <u>transformation</u> of the Borough <u>and support the economic competitiveness of the Liverpool City Region</u> will be <u>Wirral Waters, the Mersey Waters Enterprise Zone and...</u> ”
Paragraph 5 of Policy CS2 should not identify the existing employment area at Upton, which is already developed. Whilst there is the opportunity to encourage new businesses and enterprises within existing premises, there is no realistic prospect of redevelopment within the plan period.	No change is recommended. Policy CS2 is not site specific. The Wirral Employment Sites and Premises Study included a general assessment of the likely continued attractiveness, suitability and viability of all the Borough’s existing employment areas and a selection of available sites within them to identify an Employment Area Hierarchy. Policy CS17 provides for site-specific assessments where evidence relating to need, marketing, land supply and land use and the character of the surrounding area can be provided.
Paragraph 6 of Policy CS2 should be amended to read: “Port and marine-related facilities will continue to be promoted at Twelve Quays, West Float, Cammell Lairds and at the Manchester Ship Canal at Eastham (<u>including Port Wirral/QEII Dock</u>) to reflect their continued strategic importance...”, to ensure that both component parts of Eastham are included.	Accepted but simplified wording is recommended to read: “Port and marine-related facilities will continue to be promoted at Twelve Quays, West Float, Cammell Lairds and at the <u>Eastham Dock Estate</u> to reflect their continued strategic importance...” supported by amended text in the Glossary to refer to the Manchester Ship Canal, Port Wirral and the QEII Dock.

Summary of Comments Received	Recommended Response
Policy CS2 should confirm that Birkenhead Town Centre is the borough-wide focus for comparison retailing provision.	No change is recommended, as Policy CS25 – Hierarchy of Retail Centres, already identifies Birkenhead Town Centre as the sub regional centre and as ‘the Borough’s main comparison shopping destination’. It is however recommended, for the avoidance of doubt, that Policy CS25 is amended to read: “Birkenhead Town Centre (including Grange Road West, Oxtan Road, <u>Europa Boulevard, Argyle Street, Market Street and Hamilton Street</u>)”
Policy CS2 should be revised to read 'Borough-wide <u>comparison retail and leisure</u> facilities and services will first be directed to the most accessible locations in and around Birkenhead Town Centre. Secondary and district-level facilities and services operating over a more local catchment will first be directed to the larger existing <u>town</u> centres of Heswall, Liscard, Moreton and West Kirby; <u>and the district centres</u> of Bromborough Village, Hoylake and Prenton (Woodchurch Road). <u>If no suitable sites are available within the defined centres then accessible edge of centre sites and thereafter out of centre sites will be considered against the sequential approach</u> '.	The suggested additional wording is excessively detailed and would duplicate Core Strategy Policies CS25-CS29. It is however, recommended that paragraph 7 is amended, for the avoidance of doubt, to read: "Secondary and district-level facilities and services will first be directed to the <u>town and district</u> centres of Bromborough Village, Heswall, Hoylake, Liscard, Moreton, Prenton (Woodchurch Road) and West Kirby and then to other accessible sites that will be well-served by public transport".
A reference to "other biodiversity assets" should be added to paragraph 8 of Policy CS2.	Accepted. It is recommended that paragraph 8 of Policy CS2 is amended to read: "...subject to the protection of European sites, their supporting habitats <u>and other biodiversity assets</u> ."
A reference to "geodiversity" should be added to the list in paragraph 10 of Policy CS2.	Agreed. It is recommended that paragraph 10 of Policy CS2 is amended to read "...visual impact, biodiversity, <u>geodiversity</u> , landscape and heritage;"
The reference to the 'core of the conurbation' in paragraph 6.2 needs further explanation, with reference to the defined Settlement Areas.	No change is recommended, as paragraph 2.10 and reference to the older urban areas in east Wirral present a clear indication of what is meant by the 'core of the conurbation'.
The reference to a 400m easy walking distance is inconsistent with retail practice guidance which specifies a 300m distance (referred to at paragraph 21.33 of the Core Strategy) for sequential purposes. The 300 metre threshold should be adopted for consistency.	No change is recommended, as the distances quoted are intended to fulfill two different purposes. The National Planning Policy Framework glossary uses 300m to justify the location of retail and town centre uses for the purposes of national policy, while paragraph 3 of Policy CS2 uses 400m to justify the location of medium to higher density housing development to promote a sustainable pattern of development.
Urban extensions in Green Belt locations within easy walking distance of existing centres or public transport corridors can also achieve sustainable development.	No change is recommended, as no urban extensions in the Green Belt are being promoted in the Core Strategy and the provisions in Policy CS2 would, in any case, continue to apply to appropriate proposals under Policy CS20 – Housing Contingencies.

Summary of Comments Received	Recommended Response
The housing industry has moved away from higher density development, especially as there is now a lack of finance for apartments for both lenders and borrowers. It is reasonable to assume that this trend will continue well into the plan period, with family housing predominating at a density of circa 30 dwellings per hectare.	No change is recommended, as Policy CS2 is intended to permit but not require higher density development in certain locations, to promote a more sustainable pattern of development.
Generally support of the overall spatial strategy. A ongoing study of the M56 / M53 corridors with data provided by Wirral Council, should determine the likely level of impact and any measures which would be required to ensure that new development within Wirral can be sustainably delivered without detriment to the operation and safety of the Strategic Route Network.	No change is recommended, at this stage, subject to the findings of this Study.
A mix of both focused regeneration and balanced growth to create a more sustainable and flexible pattern of development is supported but development should not just be focused on areas of greatest need in the older eastern parts of the Wirral. The reference to urban sites in paragraph 3 of Policy CS3 should also include urban extensions in the Green Belt, to ensure that development is more equally spread throughout the Borough on well-located sites.	No change is recommended, as no urban extensions are being promoted within the Core Strategy.
The focus on Wirral Waters and Birkenhead is flawed and will deter investment in other logical sustainable locations.	No change in recommended, as Policy CS2 seeks to pursue a strategy of urban regeneration and environmental enhancement, to ensure that full and effective use is made of land throughout the Borough's existing urban areas.
Policy CS2 does not promote a strategy which will address the full identified needs set out within the Councils own evidence base and fails to promote a Green Belt review which is considered necessary to meet those needs.	No change in recommended, at this stage. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing requirements. The approach to the delivery of new housing development, in the event that insufficient sites come forward within the urban area, will currently be governed by Policy CS19 - Housing Implementation Plan and CS20 - Housing Contingencies.
There is no evidence that development outside an easy walking distance of 400m will be unsustainable or will not be required to meet identified housing needs. This test should also be applied in areas of greatest need.	No change is recommended, as Policy CS2 does not rule out development in other locations but seeks to focus higher density development towards the most sustainable locations.

Summary of Comments Received	Recommended Response
The definition of areas of greatest need is neither precise nor immediately discernible from Policy CS2 or the Key Diagram.	No change is recommended, as areas of greatest need are defined in the glossary as geographical areas falling within the lowest 20% of scores within the national index of multiple deprivation for England which is a robust and well-established basis for highlighting areas where regeneration needs to be prioritised, shown on the Key Diagram and supported by more detailed mapping within the accompanying Spatial Portrait.
Policy CS2 fails to address the range of needs which exist and how the delivery of housing will impact upon the regeneration aspirations set out in the supporting text and introductory chapters. Policy CS2 assumes that development in identified priority areas is sustainable by default.	The evidence contained in the forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need. The identification of and emphasis on priority areas is the result of previous consultation and sustainability appraisal, which demonstrated a high level of support for focused regeneration.
Policy CS2 fails to address the significant delivery issues associated with the regeneration agenda.	No change is recommended, at this stage. Delivery has already been addressed as part of the Council's Strategic Housing Land Availability Assessment and the wider viability of the Core Strategy will now be addressed in the forthcoming Core Strategy Viability Study.
The Local Plan should be fully interlinked with the relevant Local Transport Plan (LTP3) and provide for the integration of land use and transport planning. The location of housing and employment development sites should be focused around rail stations and along existing rail or bus corridors as the first priority. Any extension of development into the Green Belt, should only occur where good public transport and other sustainable modes exists, or can be readily and easily achieved.	No change is recommended, as Policy CS2 already reflects a focus on public transport corridors. Linkages to the Local Transport Plan have been secured through the emerging Core Strategy Infrastructure Plan and will be applied through Policy CS40 – Transport Requirements, Policy CS41 – Transport Schemes and Policy CS45 – Developer Contributions.
Welcome the intention to strengthen and enhance Wirral's distinctive environment, which should be followed through with the addition of the word "environment" in the sentences in the second and third paragraphs which read "and will be expected to make a positive contribution to local character and amenity..."	Accepted. It is recommended that paragraphs 2 and 3 of Policy CS2 are amended to read "...and will be expected to make a positive contribution to local character, <u>environment</u> and amenity;"
Restricting development outside the regeneration priority areas to only 'urban sites' could stifle development in sustainable locations which relate well to existing centres and residential areas. It is inevitable that some appropriate Green Belt sites will need to be released.	No change is recommended, at this stage. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need. The approach to the delivery of new housing development, in the event that insufficient sites come forward within the urban area, will be governed by Policy CS19 – Housing Implementation Plan and Policy CS20 – Housing Contingencies.

Summary of Comments Received	Recommended Response
<p>The promotion of port and marine-related facilities at Twelve Quays, West Float, Cammell Lairds and Eastham, to maximise the potential for off-road transport by rail and water, will require stronger, more detailed policy support to secure delivery.</p>	<p>No change is recommended, as amendments recommended to the Spatial Vision will now refer to sustainable freight transport and Policy CS16 – Criteria for Port-Related Development already specifically supports the more efficient use of rail and water transport in the locations identified.</p>
<p>The presumption in favour of Sustainable development cannot be followed without implementing an overall mitigation strategy. The need for a mitigation strategy, recognised in paragraph 22.7 of the Core Strategy, should be included in a Core Strategy policy. The following text should therefore be included in Policy CS2: <u>"Mitigation for recreational disturbance to Natura 2000 sites, which may involve a mix of access management, habitat management and provision of alternative recreational space will be provided through a Mitigation Strategy. Provision of alternative recreational space, will be identified in the site-specific Local Plan that will follow the adoption of this Core Strategy, in consultation with the other adjoining Local Authorities, Natural England and other partners whilst access and habitat management and monitoring of the strategy will be funded through (CIL?) the need for which will be regarded as critical in the Infrastructure Delivery Plan."</u> Reference to the Green Infrastructure Strategy, based on the Liverpool Green Infrastructure Framework, which should form an essential part of any mitigation strategy, should also be included in the accompanying text, as a satisfactory conclusion to the Habitat Regulations Assessment.</p>	<p>Accepted but simplified wording is recommended to amend Policy CS2 to read: <u>"Mitigation for recreational disturbance to Natura 2000 sites, which may involve a mix of access management, habitat management and provision of alternative recreational space, will be provided through a Mitigation Strategy. Provision of alternative recreational space will be identified in a site-specific Local Plan, in consultation with relevant partners."</u> It is also recommended that paragraph 6.9 is amended to read: <u>"Access and habitat management and monitoring required as a part of a Mitigation Strategy for impacts on European Sites will be funded through the mechanisms identified in Policy CS45 – Developer Contributions and guided, where appropriate, by a Green Infrastructure Strategy."</u></p>
<p>Policy CS2 should be amended to recognise the need for a balance between focused regeneration and urban expansion to meet identified housing need based on up-to-date population projections. The Councils current approach is based on the out-of-date Regional Spatial Strategy. Paragraph 9 of Policy CS2 should be amended to refer to the need for further growth in the rural area and in urban/rural locations and say: <u>'Where appropriate and in accordance with national Green Belt policies this should include the sensitive release of Green Belt land to meet its future housing requirement.'</u> The Core Strategy should be informed by a more reliable and up-to-date evidence base, confirm the requirement for a full Green Belt review or recognise the potential need for greenfield development outside the urban area rather than rely on a contingency policy.</p>	<p>No change is recommended, at this stage. The forthcoming Strategic Housing Market Assessment will provide an up-to-date assessment and will determine the Council's position in relation to future housing need.</p>

Summary of Comments Received	Recommended Response
<p>Policy CS2 demonstrates an over-dependency on development in east Wirral, to the detriment of other areas and the future sustainability of the whole Borough. This uneven distribution will not meet market demand or the need for specialist and affordable housing in the western parts of Wirral and will hinder the delivery of sustainable mixed communities. The strategic, well-planned expansion of other towns will secure their sustainability and role as centres for local employment, retail and other facilities. Policy CS2 does not provide enough flexibility to respond to changing circumstances, in the event that Wirral Waters does not come forward as envisaged.</p>	<p>No change is recommended, as Policy CS2 does not rule out development in other locations. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need. The approach to the delivery of new housing development, in the event that insufficient sites come forward within the urban area, will currently be governed by Policy CS19 - Housing Implementation Plan and Policy CS20 - Housing Contingencies.</p>
<p>Policy CS2 should address the need for a strategic review of the Green Belt now, to provide for growth rather than rely on a vague and uncertain contingency policy (Policy CS20).</p>	<p>No change is recommended at this stage, until the forthcoming Strategic Housing Market Assessment is completed.</p>
<p>Biodiversity is poorly supported in Policy CS2.</p>	<p>No change is recommended, as paragraph 10 of Policy CS2 already states that development should 'preserve and enhance local character and distinctiveness, including visual amenity, biodiversity landscape and heritage...' and '...provide/ and or contribute to a local network of green infrastructure...' and it has already been recommended that additional wording is added to refer to European Sites.</p>
<p>The wording of paragraph 8 of Policy CS2 is inconsistent with the Spatial Vision, in terms of the provision of visitor facilities at tourism attractions and references to Thurstaston.</p>	<p>Accepted but a general reference to the provision of visitor facilities rather than a specific reference to Thurstaston is recommended. It is therefore recommended that paragraph 8 of Policy CS2 is amended to read: "Tourism investment will be targeted to support regeneration in Birkenhead; provide improvements within the coastal resorts of New Brighton Hoylake and West Kirby and along the Mersey coastline; <u>to enable the provision of appropriate visitor facilities</u>; and to improve public access to the coast and countryside subject to the protection of European Sites and their supporting habitats".</p>

Policy CS3 – Green Belt

Summary of Comments Received	Recommended Response
Policy CS3 should be changed to say “ <u>The general extent of the</u> Green Belt will be maintained in Wirral...” to allow for minor changes to address boundary anomalies where appropriate, such as at three sites in Eastham at Ferry Road and Seaview Avenue.	No change is recommended, as the suggested wording introduces ambiguity and would be inconsistent with the National Planning Policy Framework, which states that “...the essential characteristics of Green Belts are their openness and their permanence...” and that “...once established, Green Belt boundaries should only be altered in exceptional circumstances...” (NPPF, paragraphs 79 and 83 refer) and Regional Spatial Strategy Policy RDF4 has now been revoked. Site specific issues will only be considered if a review of the Green Belt is considered to be necessary, following the completion of the forthcoming Strategic Housing Market Assessment.
Paragraph 2 of Policy CS3 should be amended to read " inappropriate development as defined in national policy, will not be approved except in very special circumstances, <u>where</u> the potential harm to the Green Belt is clearly outweighed by other considerations", (not "unless"), as the "very special circumstances" must exceed the harm to the Green Belt.	Accepted. It is recommended that Paragraph 2 of Policy CS2 is amended to read "...inappropriate development, as defined in national policy, will <u>only</u> be approved <u>in</u> very special circumstances, <u>where</u> the potential harm to the Green Belt is clearly outweighed by other considerations."
The list of exceptions in paragraph 6.13 should include "ones to aid the conservation or interpretation of biodiversity".	No change is recommended, as the text reflects the list of exceptions set out in the National Planning Policy Framework.
Policy CS3 needs to allow for a review of Green Belt boundaries to deliver the housing needed over the plan period as the Core Strategy has failed to demonstrate that housing needs can realistically be delivered without a Green Belt review.	No change is recommended, at this stage. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need.
In light of the Council's current inability to demonstrate a 5 year supply of housing land and the need to find additional deliverable sites, an adjustment to the Green Belt boundary is required immediately.	The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need. The approach to the delivery of new housing development, in the event that insufficient sites come forward within the urban area, will currently be governed by Policy CS19 - Housing Implementation Plan and Policy CS20 - Housing Contingencies.
Established in 1983 and last reviewed (extended) in 2000 (during a time of housing restraint), Policy CS3 is flawed and assumes housing targets will be delivered. The Council should take note of the National Planning Policy Framework and review the boundaries across Wirral as a matter of urgency.	No change is recommended. The position in relation to the Green Belt is clearly articulated in Policy CS3. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need. The approach to the delivery of new housing development, in the event that insufficient sites come forward within the urban area, will currently be governed by Policy CS19 - Housing Implementation Plan and Policy CS20 - Housing Contingencies.

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

Summary of Comments Received	Recommended Response
Not all land that is currently designated as Green Belt in Wirral serves all the purposes of the Green Belt listed in paragraph 80 of the National Planning Policy Framework, including sites where development would form a natural 'rounding off' to a settlement and would lead to no greater incursion into open land than the current limits of the settlement. It is not realistic to expect the Borough's dwelling targets to be met wholly within the existing urban areas.	No change is recommended, at this stage. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need.
As Wirral Waters is unlikely to deliver the expected number of dwellings in the five year period to 2018, the Council should look to review the Green Belt now and safeguard land through the Core Strategy, rather than through a later site allocations process.	No change is recommended, at this stage. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need.

Key Diagram

Summary of Comments Received	Recommended Response
The high pressure oil pipeline could be shown on the Key Diagram	No change is recommended. The Key Diagram is included to illustrate the broad locations for the strategic policies described within the Core Strategy. It not intended to be a comprehensive representation of constraints in the Borough. Policy CS42 – Development Management provides for the protection of strategic pipelines and the presence of pipelines is also identified in the accompanying Spatial Portrait. Up-to-date boundaries are also maintained as part of the by the Council's internal development management mapping records.
The white areas on the Key Diagram are not defined in the legend	The white areas identify areas of greatest need, which are already shown on the Legend. It is, however, recommended that the Key Diagram is amended, for the avoidance of doubt, to show a clearer notation of areas of greatest need.
Major natural assets are not shown on the Key Diagram and should include European Sites and their supporting habitats, designated Local Nature Reserves and Cheshire Wildlife Trust reserves.	The Key Diagram is not intended to be a comprehensive representation of all the constraints within the Borough. The Spatial Portrait includes more detailed maps showing sites of international and national importance. It is, however, recommended that symbols are added to the maps in the Spatial Portrait, to show Local Nature Reserves and Cheshire Wildlife Trust reserves.
The new development at New Brighton waterfront should be shown as a Town Centre on the Key Diagram.	No change is recommended, as the New Brighton waterfront is not identified as a Town Centre in Policy CS25 – Hierarchy of Retail Centres.
At least the European Sites should be marked on the Key Diagram, to guide readers regarding the responsibility that Wirral has for its coast.	The Key Diagram is not intended to be a comprehensive representation of constraints within the Borough and the presence of European Sites is already referred to throughout the policies of the Core Strategy. The Spatial Portrait includes more detailed maps showing sites of International and national importance.
The Mineral Safeguarding Area at Moreton is shown as a yellow circle on the Key Diagram but is shown as white in the legend.	Accepted. It is recommended that the Key Diagram is amended to match the Legend.

Policy CS4 – Priorities for Wallasey

Summary of Comments Received	Recommended Response
Point 2 of Policy CS4 should refer to integration with the new city neighbourhoods at Wirral Waters as a whole, rather than just East Float.	Accepted. It is recommended that Point 2 of Policy CS4 is amended to read: “Support integration with the new city neighbourhoods at <u>Wirral Waters</u> , while maintaining a clear interface between the residential suburbs and the commercial areas to the south in Settlement Area 2.” For consistency, it is recommended that the same change should also be made to Policy CS6 – Suburban Birkenhead.
Policy CS4 provides the necessary positive strategy to address the conservation and enhancement of the historic environment. The Core Strategy should, however, include explicit coverage of Heritage at Risk as required by Paragraph 126 of the National Planning Policy Framework. The 2012 Heritage at Risk register includes St James Church and Fort Perch Rock New Brighton.	No change is recommended, as Policy CS43 – Design, Heritage and Amenity already provides for proposals that will “safeguard the future of heritage at risk” and the importance of Fort Perch Rock is already referred to under point 9 of Policy CS4.
The urban coastal resort of New Brighton should be re-designated as a Town Centre, on the same level as Liscard, to continue to focus investment following the completion of the recent waterfront regeneration project and to include Victoria Road Traditional Suburban Centre.	No change is recommended, as the Marine Point development is an out-of-centre retail and leisure development. Paragraph 21.12 of the Core Strategy clearly indicates that existing out-of-centre retail parks are not regarded as “centres” for the purposes of Policy CS25 – Hierarchy of Retail Centres, and that new development in these locations will only be permitted subject to Policy CS29 – Criteria for Edge-of-Centre and Out-of-Centre Facilities, including the sequential approach and an assessment of impact on existing centres. The existing Unitary Development Plan identifies New Brighton waterfront as a Tourist Development Site and this approach is expected to be carried forward into a site-specific Local Plan. The degree of separation between the Marine Point development and New Brighton (Victoria Road) Local Centre and the sizeable intervening residential area, where the introduction of town centre uses would not be appropriate, make it inappropriate to include the Marine Point development within an expanded local centre boundary alongside the Local Centre at Victoria Road.
Policy CS4 will not successfully address the problems of loss of population, out-migration, transport infrastructure and the need for additional open space.	No change is recommended, as Policy CS4 is only intended to outline the overall priorities for the promotion of sustainable development within the Settlement Area.
Reducing the noise along major roads that link Wallasey with other areas could be done by ensuring that traffic complies with the relevant speed limits.	No change is recommended, as the enforcement of traffic speed falls outside the control of the planning system.

Summary of Comments Received	Recommended Response
More detail on the levels of development expected within each Settlement Area should be provided.	No change is recommended, as Policy CS4 is intended to outline the overall priorities for the promotion of sustainable development within the Settlement Area rather than the quantities of development involved. The provision of detailed numbers would be over detailed and inflexible and was opposed by respondents to previous consultations. Further information on the potential capacity of the Settlement Area is, however, available within the supporting evidence base documents and has been used to identify likely future infrastructure requirements.
The location specific references to additional pitch requirements should be taken out of Policy CS4, until a revised Playing Pitch Strategy has been completed.	Accepted. It is recommended that point 11 of Policy CS4 is amended to read: "Maintain and improve the provision of open space, to increase the <u>number of allotments</u> and natural and semi natural greenspace with biodiversity value, and strengthen the provision of green infrastructure without compromising other open space functions."
Point 12 of Policy CS4 should be amended to read: "Reduce flood risks along the coast; from the Birket and its tributaries; and from surface water, <u>and to consider the availability of water and wastewater infrastructure by working with utility providers to promote a coordinated approach to the delivery of development with the delivery of future infrastructure works.</u> " to remove the reference to local limitations in the supply of water and/or disposal of wastewater. An on-going dialogue will be maintained with the Council to provide information on infrastructure capacity and the delivery of new infrastructure and improvement works.	Accepted but it is recommended that point 12 of Policy CS4 is amended to read: "Reduce flood risks along the coast; from the Birket and its tributaries; and from surface water;" as Policy CS42 – Development Management already requires development to be adequately served by essential local infrastructure.
Support the priorities for this settlement area but Policy CS4 could be strengthened by identifying the broad quantum of development to be focused in key locations.	No change is recommended, as the provision of detailed numbers would be over-detailed and inflexible and was opposed by respondents to previous consultations. Further information on the potential capacity of the Settlement Area is however available within the supporting evidence base documents and has been used to identify likely future infrastructure requirements in consultation with infrastructure providers.
Cycle paths must actually be rideable. The route from Cross Lane behind B and Q is often flooded and in Winter, is pitch black at peak times.	No change is recommended as the ongoing maintenance of existing cycle paths falls outside the planning system. This comment has, however, been passed to the Head of Environment and Regulation.

Policy CS5 – Priorities for the Commercial Core of Birkenhead

Summary of Comments Received	Recommended Response
<p>The Vision Statement for the Commercial Core should be reworded to read: “By the end of the plan period, the Commercial Core will be in the process of being transformed. <u>This will be driven by the development of a series of new City Neighbourhoods at Wirral Waters, including Catalyst Neighbourhoods at East Float and Bidston Dock which will be being developed for a diverse mix of uses including commercial uses, residential, leisure, retail and cultural. Wirral Waters will be emerging as a major destination and will be playing a leading role in the economic growth and diversification of the Borough and wider Liverpool City Region</u>”, to improve the clarity of the Vision Statement and reflect the scale and nature of the economic transformation which will be taking place at Wirral Waters.</p>	<p>Accepted but a simplified wording is recommended to read: “By the end of the plan period, the Commercial Core will be in the process of being transformed, <u>driven by a major mixed-use development at Wirral Waters. A thriving...</u>”, as the additional wording suggested is already supported by Policy CS12.</p>
<p>High voltage underground electricity transmission cables run across Settlement Area 2. Unrestricted and safe access must be maintained at all times with no trees or shrubs within 3 metres of the cable as, ultimately, the roots may grow to cause damage to the cable.</p>	<p>No change is recommended to Policy CS5 but it is recommended that point 11 of Policy CS42 – Development Management is amended to read: “will not have an unacceptable impact on the operation of Liverpool Airport, Harwarden Aerodrome and the Wallasey Beacon; <u>or the safe and uninterrupted operation of utilities, electricity transmission networks, pipelines, important electrical equipment or instrumentation or their safeguarding zones.</u>”</p>
<p>The term 'supporting' in Point 1 of Policy CS5 must be clarified so that the scale of retail envisaged in the New City Neighbourhood around Birkenhead Town Centre cannot be misconstrued.</p>	<p>No change is recommended. Policy CS12 – Wirral Waters sets out the scope of development that will be permitted as part of the New City Neighbourhood. Policy CS25 – Hierarchy of Retail Centres sets out the scope of development that will be permitted at Birkenhead Town Centre.</p>
<p>Point 1 of Policy CS5 should be reworded to read: “Establish a <u>series of new City Neighbourhoods at Wirral Waters</u> and around Birkenhead Town Centre <u>to deliver transformational</u> economic growth, jobs and training...”</p>	<p>Accepted but the use of the word ‘transformational’ is considered to be unnecessary as Policy CS5 already refers to ‘significant levels of new high quality housing and employment’. It is therefore recommended that point 1 of Policy CS5 is amended to read: “Establish <u>a series of new city neighbourhoods at Wirral Waters</u> and around Birkenhead Town Centre, <u>to deliver major economic growth...</u>”</p>
<p>The reference to 'off shore renewable energy' in point 3 of Policy CS5 should be changed to 'renewable and low carbon energy', to more accurately reflect the energy development opportunities which these locations provide.</p>	<p>No change recommended, as the Council only supports provision for offshore renewable energy at Cammell Lairds, Twelve Quays and West Float.</p>

Summary of Comments Received	Recommended Response
Point 4 of Policy CS5 should be revised to read: “ <u>Secure the delivery</u> of the International Trade Centre at West Float;”	It is recommended that point 4 of Policy CS5 is only amended to read: “Support the <u>delivery</u> of the International Trade Centre at West Float”, as it will be the responsibility of the developer to secure the delivery of the development.
Point 6 of Policy CS5 should be amended to support integration with Wirral Waters as a whole rather than just East Float.	Accepted. It is recommended that Point 6 of Policy CS5 is amended to read: “Support integration with <u>Wirral Waters</u> and access to employment and training from within the surrounding areas in Bidston, Birkenhead, Leasowe, Liscard, Rock Ferry, Seacombe and Tranmere;”
Policy CS5 provides the necessary positive strategy to address the conservation and enhancement of the historic environment. The Core Strategy should, however, include explicit coverage of Heritage at Risk as required by Paragraph 126 of the National Planning Policy Framework. The 2012 Heritage at Risk register includes Birkenhead Priory and Hamilton Square Conservation Area.	No change recommended as Policy CS43 – Design, Heritage and Amenity already provides for proposals that will ‘safeguard the future of heritage at risk’ and Birkenhead Priory and Hamilton Square Conservation Area are already referred to in paragraph 10.1 and in point 7 of Policy CS5.
Support the priorities for this Settlement Area but Policy CS5 could be strengthened by identifying the broad quantum of development to be focused in key locations.	No change is recommended, as the provision of detailed numbers would be over detailed and inflexible and was opposed by respondents to previous consultations. Further information on the potential capacity of the Settlement Area is however available within the supporting evidence base documents and has been used to identify likely future infrastructure requirements in consultation with infrastructure providers.
The emphasis on promoting this area over and above all other areas is flawed. The plans for Birkenhead Dock Estate are undeliverable. It is unrealistic to expect planning policy to change the perception of this area. The market has clearly indicated that it is not interested in a Woodside residential project. No evidence on deliverability is presented. There are no plans to address the declining vitality and viability of Birkenhead Town Centre, utility infrastructure is poor and transportation requirements are significant.	No change is recommended, as national policy indicates that local plans should encourage and not act as an impediment to sustainable growth (NPPF paragraph 19).
It is not clear from Policy CS5 that the port function of Birkenhead Dock Estate will be retained in a rationalised and consolidated form by relocating displaced tenants and businesses that do not require a port location.	No change is recommended, as this is a matter to be addressed by the port operator in the context of the Port Masterplan, within the framework set out within the Core Strategy.

Summary of Comments Received	Recommended Response
<p>Point 10 of Policy CS5 should be altered to read "Maintain strong transport links and <u>rail and road</u> freight connections from the industrial areas and docklands to the M53 motorway <u>and the national rail network</u> ..." as the greater use of rail will not be delivered, unless existing links are retained and brought back into operable condition.</p>	<p>No change is recommended, as the existing wording would include rail and road connections and would not prevent the greater use of rail or the reuse of existing links, where this is found to be viable. Policy CS12 requires that detailed planning applications for each element of proposed development at East Float, West Float and Bidston Dock develop, update and implement the public transport and access strategy for the area and Policy CS41 - Transport Schemes states that land will be safeguarded to facilitate the greater use of public transport and to support the more efficient use of the rail network (point 3) and the protection of routes that may be critical in developing future transport infrastructure (point 5).</p>
<p>Point 13 of Policy CS5 should be altered to read: "Address the need for flood resilient design; reduce tidal, river and other flood risks; <u>to consider the availability of water and wastewater infrastructure by working with utility providers to promote a coordinated approach to the delivery of development and the delivery of future infrastructure works</u>" to remove the reference to local limitations on the supply of water and the treatment and disposal of waste water. An on-going dialogue will be maintained with the Council to provide information on infrastructure capacity and the delivery of new infrastructure and improvement works.</p>	<p>Accepted but it is recommended that point 13 of Policy CS5 is amended to read: "Address the need for flood resilient design and reduce tidal, river and other flood risks." as Policy CS42 – Development Management already requires development to be adequately served by existing local infrastructure.</p>
<p>The Core Strategy should contain a plan of the Birkenhead Dock Estate or refer to a plan within the Spatial Portrait to include Twelve Quays and West Float. The Core Strategy should also contain a plan of Cammell Lairds or refer to a plan within the Spatial Portrait</p>	<p>As the Core Strategy is not a site specific Local Plan, it is recommended that appropriate plans in the Spatial Portrait are referred to in the Glossary.</p>
<p>More detail on the levels of development expected in each Settlement Area should be provided.</p>	<p>No change recommended, as Policy CS5 is only intended to outline the overall priorities for the promotion of sustainable development within the Settlement Area rather than the quantities of development involved. The provision of detailed numbers would be over detailed and inflexible and was opposed by respondents to previous consultations. Further information on the potential capacity of the Settlement Area is, however, available within the supporting evidence base documents and has been used to identify likely future infrastructure requirements.</p>

Summary of Comments Received	Recommended Response
A new point should be added to Policy CS5 to read: " <u>Deliver a major new retail and leisure destination at Bidston Dock (Wirral Waters) to complement development at the East Float Strategic Site and which complements the retail and leisure offer at Birkenhead Town Centre;</u> " to reflect the proposal to develop a major nationally important leisure/retail destination at Bidston Dock.	No change is recommended, as the proposal to develop a major nationally important leisure and retail destination could only be supported subject to the provision of further information which has not yet been provided (NPPF paragraphs 24, 26 and 27 refer). Any proposal for town centre uses in an out of centre location would be required to comply with Policy CS29 – Criteria for Edge-of-Centre and Out-of-Centre Facilities.
A new point should be added to Policy CS5 to read: " <u>Deliver a commercial-led mixed use scheme at Woodside to enhance the economic role and commercial offer of Birkenhead Town Centre</u> ", to reflect the identification of Woodside in Policy CS2.	Accept the inclusion of a new point in Policy CS5 but a revised wording is recommended to remove the duplicate reference to 'commercial' and to reflect that delivery will be the responsibility of the developer, to read: " <u>Support a mixed use scheme at Woodside to enhance the economic role and commercial offer of Birkenhead Town Centre;</u> "

Policy CS6 – Priorities for Suburban Birkenhead

Summary of Comments Received	Recommended Response
Point 10 of Policy CS6 should refer to the Green Infrastructure Strategy which has not yet been undertaken (referred to in Core Strategy paragraph 22.6), as the decision to maintain and improve open space cannot be concluded until the Green Infrastructure Strategy has been completed to indicate whether additional land should be given to residential development where appropriate.	No change is recommended, as the general principle of the need to maintain and improve open space within the Settlement Area has already been established through the Wirral Open Space Assessment 2012 and the Council's forthcoming Green Infrastructure Strategy will form part of the evidence base for a future site-specific Local Plan.
The Vision Statement for Policy CS6 should support residential development, in light of the shortfall in housing land supply identified in the Council's Annual Monitoring Report 2012.	No change is recommended, as point 1 of Policy CS6 already expresses the priority to: "...Maintain and provide attractive residential areas with good access to Birkenhead, Liverpool and the M53 Motorway."
High voltage underground electricity transmission cables run across Settlement Area 3. Unrestricted and safe access must be maintained at all times with no trees or shrubs within 3 metres of the cable as, ultimately, the roots may grow to cause damage to the cable. Substations are vital to the efficient operation of the electricity transmission network for switching circuits or transforming voltage and further essential utility development may be necessary.	No change is recommended to Policy CS6 but it is recommended that point 11 of Policy CS42 – Development Management is amended to read: "not have an unacceptable impact on the operation of Liverpool Airport, Harwarden Aerodrome and the Wallasey Beacon, <u>or the safe and uninterrupted operation of utilities, electricity transmission networks, pipelines, important electrical equipment or instrumentation or their safeguarding zones.</u> "
Policy CS6 provides the necessary positive strategy to address the conservation and enhancement of the historic environment. The Core Strategy should, however, include explicit coverage of Heritage at Risk as required by Paragraph 126 of the National Planning Policy Framework. The 2012 Heritage at Risk register includes Flaybrick Cemetery Park and Garden and Conservation Area and Rock Park Conservation Area.	No change is recommended as Policy CS43 – Design, Heritage and Amenity already provides for proposals that will "safeguard the future of heritage at risk" and the importance of Flaybrick Cemetery and Rock Park Conservation Area is already referred to in point 7 of Policy CS6.
Market renewal activity is hugely vulnerable. There is insufficient open space. Utility and transport infrastructure need upgrading. Policy CS6, which will derive the majority of new housing from market renewal activity, will not successfully address these problems.	No change is recommended, as Policy CS6 is only intended to outline the overall priorities for the promotion of sustainable development within the Settlement Area.
The location specific references to additional pitch requirements should be taken out of Policy CS6, until a revised Playing Pitch Strategy has been completed.	It is recommended that point 10 of Policy CS6 is amended to read: "Maintain and improve open space, to strengthen the provision of green infrastructure <u>and to increase the amount of recreational open space and natural and semi natural greenspace with biodiversity value.</u> "
An additional bullet point should be added to Policy CS6, to encourage additional residential development in sustainable locations to support the wider identified housing need.	No change is recommended as point 1 of Policy CS6 already expresses the priority to "...Maintain and provide attractive residential areas with good access to Birkenhead, Liverpool and the M53 Motorway".

Summary of Comments Received	Recommended Response
<p>The commitment to support greater use of the Borderlands railway line is welcomed. Promoting improvements to the line is a key issue for the whole Borough, and a key issue for each area affected. A stronger policy is required to provide support for improvement works, including improved station facilities, a new station at Woodchurch, electrification, greater service frequency and direct services to Liverpool, to improve access to jobs and reduce car-based commuting.</p>	<p>No change is recommended, as point 13 of Policy CS6 will already allow these improvements to be supported, subject to the identification of a viable and suitably funded scheme which can be supported under Policy CS41 – Transport Schemes and through the emerging Core Strategy Infrastructure Plan and Delivery Framework.</p>
<p>Point 11 of Policy CS6 should be altered to read: “Reduce flood risk along the coast of Rock Park, along the Fender Valley and from surface water; <u>and to consider the availability of water and wastewater infrastructure by working with utility providers to promote a coordinated approach to the delivery of development and the delivery of future infrastructure works</u>” to remove the reference to local limitations on the supply of water and the treatment and disposal of waste water. An on-going dialogue will be maintained with the Council to provide information on infrastructure capacity and the delivery of new infrastructure and improvement works.</p>	<p>Accepted but it is recommended that point 11 of Policy CS6 is amended to read: “Reduce flood risk along the coast of Rock Park, along the Fender Valley and from surface water;” as Policy CS42 – Development Management already requires development to be adequately served by existing local infrastructure.</p>
<p>Support the priorities for this Settlement Area but Policy CS6 could be strengthened by identifying the broad quantum of development to be focused in key locations.</p>	<p>No change is recommended, as the provision of detailed numbers would be over detailed and inflexible and was opposed by respondents to previous consultations. Further information on the potential capacity of the Settlement Area is however available within the supporting evidence base documents and has been used to identify likely future infrastructure requirements in consultation with infrastructure providers.</p>
<p>More detail on the levels of development expected in each Settlement Area should be provided.</p>	<p>No change recommended as Policy CS6 is only intended to outline the overall priorities for the promotion of sustainable development within the Settlement Area rather than the quantities of development involved. The provision of detailed numbers would be over detailed and inflexible and was opposed by respondents to previous consultations. Further information on the potential capacity of the Settlement Area is, however, available within the supporting evidence base documents and has been used to identify likely future infrastructure requirements.</p>

Policy CS7 – Priorities for Bebington, Bromborough and Eastham

Summary of Comments Received	Recommended Response
There is a good opportunity to join existing sites in accord with the recommendations of the Lawton Report Making Space for Nature. An additional point could be added to read: " <u>Seek to enhance the network of natural/semi-natural GI to join the existing biodiversity assets.</u> "	Accepted. It is recommended that point 8 of Policy CS7 is amended to read: "Maintain and enhance <u>a network of linked biodiversity assets</u> , the national and international importance of the inter-tidal foreshores and the wooded, natural and semi-natural character and biodiversity value of the western and southern fringes of the Settlement Area;"
Point 2 of Policy CS7 should clarify that the Dock Estate at Eastham includes Port Wirral, the QEII Dock and the Manchester Ship Canal.	Accepted but it is recommended that point 2 of Policy CS7 is amended to read: "...and the <u>Eastham Dock Estate</u> as a low carbon inland transport corridor, for port-related storage, processing and distribution uses, waterborne freight and rail transport;" supported by an amended Glossary for the Eastham Dock Estate to refer to the Manchester Ship Canal, Port Wirral and the QEII Dock.
There should be a firm commitment to carry out points 6 to 9 of Policy CS7.	No change is recommended, as the inclusion of points 6 to 9 in Policy CS7 in the final adopted Core Strategy will ensure that they are fully taken into account as part of the statutory Development Plan for Wirral.
The coastline is also of heritage importance. Concerned that infill house building at Bromborough Pool is not designed to blend in fully with the traditional style of the original houses.	No change is recommended, as planning applications at Bromborough Pool have already been determined and point 6 of Policy CS7 already allows for the protection of both designated and undesignated heritage assets.
The site of the former Bromborough Power Station should be retained as public open space and as an addition to Eastham Country Park.	No change is recommended as part of the Bromborough Power Station site has already been designated as Urban Greenspace in the Unitary Development Plan.
Object to any proposal that encroaches on the existing playing fields at Bridle Road.	No change is recommended, as point 7 of Policy CS7 already provides for the protection of the provision of high quality open space and playing fields.
The 14th Century Manor House known as Abbey Grange (off Bridle Road) should be listed and preserved.	No change is recommended, as the process of listing buildings is not undertaken by English Heritage and not through the Core Strategy.
The former Admiralty site in Ferry Road (adjacent to the golf club house) should be returned to Green Belt status.	No change is recommended, as the site is already in the Green Belt.
Policy CS7 provides the necessary positive strategy to address the conservation and enhancement of the historic environment. The Core Strategy should, however, include explicit coverage of Heritage at Risk as required by Paragraph 126 of the National Planning Policy Framework. The 2012 Heritage at Risk register includes Christchurch, Port Sunlight, St Andrew's Church, Bebington and Bromborough Court	No change is recommended as Policy CS43 – Design, Heritage and Amenity, already provides for proposals that will "safeguard the future of heritage at risk" and the importance of Port Sunlight Conservation Area is already referred to in Paragraph 12.2 and Point 6 of Policy CS7.

Summary of Comments Received	Recommended Response
House.	
Settlement Area 4 is being consigned to an unsustainably low level of growth. Infill housing development will not deliver enough jobs and will not meet the existing needs of the young, working age or elderly population.	No change is recommended, as Policy CS7 is only intended to outline the overall priorities for the promotion of sustainable development in the Settlement Area.
The location specific references to additional pitch requirements should be taken out of Policy CS7, until a revised Playing Pitch Strategy has been completed.	No change is recommended, as Point 7 of Policy CS7 only refers to "Protect the provision of high quality open space and playing fields..." and does not make any reference to additional pitch requirements.
Point 11 of Policy CS7 should be rephrased to read: " <u>Consider the availability of water and wastewater infrastructure by working with utility providers to promote a coordinated approach to the delivery of development and the delivery of future infrastructure works</u> " to remove the reference to local limitations in the supply of water and / or disposal of waste water. An on-going dialogue will be maintained with the Council, to provide information on infrastructure capacity and the delivery of new infrastructure and improvement works.	Accepted but it is recommended to delete point 11 of Policy CS7, as Policy CS42 – Development Management already requires development to be adequately served by essential local infrastructure.
References to the Croft Retail and Leisure Park, as the Borough's most important comparison shopping destination second only to Birkenhead, have been omitted since the previous consultation on Draft Settlement Area Policies. The Park represents an important asset to the Borough which should be recognised within the Core Strategy, in terms of the regeneration and economic revitalisation of the southern part of the Borough, its role as a major employer and service provider, providing over 1,300 jobs and its ability to claw back trade leaking to competing facilities at Chester, Liverpool and Cheshire Oaks. The references should be re-instated.	No change is recommended, as references to the out-of-centre Croft Retail and Leisure Park have been moved to the Spatial Portrait. Policy CS25 – Hierarchy of Retail Centres, sets out the hierarchy of retail centres in the Borough and Policy CS29 – Criteria for Edge-of-Centre and Out-of-Centre Facilities, sets out the criteria that will be applied to out-of-centre retail and leisure developments.
Supportive of the priorities for this Settlement Area but Policy CS7 could be strengthened by identifying the broad quantum of development to be focused in key locations.	No change is recommended, as the provision of detailed numbers would be over detailed and inflexible and was opposed by respondents to previous consultations. Further information on the potential capacity of the Settlement Area is however available within the supporting evidence base documents and has been used to identify likely future infrastructure requirements in consultation with infrastructure providers.

Summary of Comments Received	Recommended Response
Support the principle of providing attractive residential areas with good access Birkenhead, Liverpool, Ellesmere Port, Chester and the M53 advocated in point 1 of Policy CS7 but object to the boundary of Settlement Area 4 defined in Picture 8.1 of the Core Strategy. The southern boundaries of Settlement Area 4 should be amended to include land up to the boundary of the M53 Motorway which provides a more defensible Green Belt boundary, as development in this location would form an appropriate extension to the urban area to meet future housing requirements.	No change is recommended, as the boundary to Settlement Area 4 currently follows the boundary to the Green Belt. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing needs.
The Eastham Dock Estate should be designated as a Strategic Location for port and related development to deliver a multi-modal served port-centric distribution hub and freight interchange, to more clearly reflect the strategic importance of the opportunity at Port Wirral.	No change is recommended, as the Core Strategy is not a site-specific Local Plan. Policy CS2 – Broad Spatial Strategy (as amended) already refers to the strategic importance of the Eastham Dock Estate and point 2 of Policy CS7 already refers to an acceptable range of uses including “port-related storage, processing and distribution uses, waterborne freight and rail transport.”
The strategic importance of the Eastham Dock Estate should be reflected on the Key Diagram.	No change is recommended, as a ‘Port Facility’ symbol is already included on the Key Diagram. It is however recommended that the wording on the accompanying legend is amended to read “ <u>Strategic</u> Port Facility”.

Policy CS8 – Priorities for Leasowe, Moreton, Upton, Greasby and Woodchurch

Summary of Comments Received	Recommended Response
There is no realistic commercial market evidence to maintain or promote Moreton for the priority sectors identified in point 2 of Policy CS8. The current concentration of food manufacturing facilities reflects a historic bespoke development in the early 1950's. The economy, market perception, locational and logistical requirements of modern manufacturing businesses are materially different. The Council's Employment Land and Premises Study accepts that the uses are highly specialised and are unlikely to attract a single occupier. There is no robust market evidence that the site is suitable for Small and Medium-sized Enterprises (SMEs).	No change is recommended, as Policy CS8 only seeks to “maximise the economic contribution of the industrial complexes....to maintain accessible local employment opportunities” for the uses specified. The Wirral Employment Land and Premises Study recommends that all employment land in west Wirral should be retained and the research that informed the Study demonstrated a rapid growth in SME’s, supported by the number of enquiries made to the (then) Mersey Partnership and Invest Wirral and Tarran Industrial estate continues to be a successful location for a wide range of SME’s.
Point 9 of Policy CS8 should also refer to "other biodiversity assets".	Accepted. It is recommended that Point 9 of Policy CS8 is amended to read: “Maintain and enhance <u>biodiversity assets</u> , the national and international nature conservation value of the intertidal foreshore to the north of the area and <u>its</u> supporting habitats.”
Champions Business Park in Upton is highly unlikely to meet the requirements of the industries specified in point 2 of Policy CS8. Focusing on B1, B2 and B8 uses undermines the wider potential of the area to attract other business activities, generate employment and contribute towards the revitalisation of the economy.	No change is recommended, as Policy CS17 – Protection of Employment Land, already provides for the consideration of alternative uses on employment sites.
The Core Strategy should include explicit coverage of heritage assets at risk as required by paragraph 126 of the National Planning Policy Framework.	No change is recommended to Policy CS8, as there were no entries in the 2012 Heritage at Risk Register within this Settlement Area and Policy CS43 – Design, Heritage and Amenity provides for the proposals that will “safeguard the future of heritage at risk” across the Borough as a whole, including within Settlement Area 5.
The Council will need to maintain a deliverable supply of housing land. In light of the inability to demonstrate a five year supply of housing land, it is important that additional deliverable sites are brought forward now.	No change is recommended, as Policy CS8 is only intended to outline the overall priorities for the promotion of sustainable development within the Settlement Area and the forthcoming Strategic Housing Market Assessment will determine the Council’s position in relation to future housing need.
Point 2 of Policy CS8 should be amended to include reference to paragraph 22 of the National Planning Policy Framework, which says that applications for alternative uses should be permitted where there is no longer a reasonable prospect of a site being used for employment purposes.	No change is recommended, as Policy CS17 – Protection of Employment Land, already provides for the consideration of alternative uses on employment sites.

Summary of Comments Received	Recommended Response
There should be a greater emphasis towards more sustainable growth in Settlement Area 5 which is being consigned to an unsustainably low level of growth. Infill housing development will not deliver enough jobs and Policy CS8 will not meet the needs of the young, working age or elderly population.	No change is recommended, as Policy CS8 is only intended to outline the overall priorities for the promotion of sustainable development in the Settlement Area.
The commitment to 'support greater use' of the Borderlands railway line has been omitted from Policy CS8.	No change is recommended, as the works required will fall within the boundaries of Settlement Area 3 – Suburban Birkenhead and Settlement Area 8 – Rural Areas.
Point 10 of Policy CS8 should be rephrased to read: <u>“Consider the availability of water and wastewater infrastructure by working with utility providers to promote a coordinated approach to the delivery of development and the delivery of future infrastructure works.”</u> to remove the reference to local limitations in the supply of water and / or disposal of waste water. An on-going dialogue will be maintained with the Council to provide information on infrastructure capacity and the delivery of new infrastructure and improvement works.	Accepted but it is recommended that point 10 of Policy CS8 is deleted as Policy CS42 – Development Management, already requires development to be adequately served by essential local infrastructure.
Maintaining the physical separation of Greasby has been omitted from Point 12 of Policy CS8.	Accepted. It is recommended that Point 12 of Policy CS8 is amended to read: “Maintain the physical separation between Leasowe and Wallasey; Moreton, Upton and Woodchurch and Birkenhead; Moreton and Hoylake; <u>Greasby, West Kirby and Irby</u> ; and the distinctiveness of the remaining rural villages at Frankby, Saughall Massie and Landican.”
Support of the priorities for this settlement area but Policy CS8 could be strengthened by identifying the broad quantum of development to be focused in key locations.	No change is recommended, as the provision of detailed numbers would be over detailed and inflexible and was opposed by respondents to previous consultations. Further information on the potential capacity of the Settlement Area is however available within the supporting evidence base documents and has been used to identify likely future infrastructure requirements in consultation with infrastructure providers.

Policy CS9 – Priorities for Hoylake and West Kirby

Summary of Comments Received	Recommended Response
Point 5 of Policy CS9 should be altered to refer to other biodiversity assets.	It is recommended that point 5 of Policy CS9 is amended to read: "Maintain and enhance facilities for visitors, including provision for leisure, tourism, golf, coastal recreation and water sports and the open spaces associated with the coastal promenades and North Wirral Coastal Park, while maintaining and enhancing <u>biodiversity assets</u> , the national and international nature conservation value of the intertidal foreshores and their supporting habitats, the Hilbre Islands and the Victorian and Edwardian heritage of the coastal resorts."
Policy CS9 provides the necessary positive strategy to address the conservation and enhancement of the historic environment. The Core Strategy should, however, include explicit coverage of Heritage at Risk as required by Paragraph 126 of the National Planning Policy Framework.	No change is recommended to Policy CS9, as there were no entries in the 2012 Heritage at Risk Register within this Settlement Area and Policy CS43 – Design, Heritage and Amenity, provides for proposals that will "safeguard the future of heritage at risk" across the Borough as a whole, including Settlement Area 6.
There is limited scope for new development because of physical constraints but growth is still needed to prevent the Area becoming dormant and slowly unsustainable. Infill housing development will not deliver enough jobs and will not meet the existing needs of the young, working age or elderly population.	No change is recommended, as Policy CS9 is only intended to outline the overall priorities for the promotion of sustainable development within the Settlement Area. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need.
Policy CS9 fails to address the need for affordable and market housing in Hoylake and the needs of the aging population identified in the Council's existing Strategic Housing Market Assessment.	No change is recommended, at this stage. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need.
There is no evidence to indicate that there is a capacity issue at the level crossing at Carr Lane.	Accepted. It is recommended that point 9 of Policy CS9 is amended to read: " Monitor and manage traffic flows to maximise highway efficiency on routes to Hoylake and West Kirby; promote sustainable transport; and <u>avoid adverse impacts from</u> pedestrian and vehicular traffic on the rail crossings at Carr Lane and between Meols and Hoylake."
Support the provision of further residential development in Meols. New sites will need to be identified to accommodate growth and assist in meeting local housing need, such as land to the rear of Birch Road and Rycroft Road, Meols.	No change is recommended. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need.

Summary of Comments Received	Recommended Response
<p>Point 11 of Policy CS9 should be rephrased to read: "<u>Consider the availability of water and wastewater infrastructure by working with utility providers to promote a coordinated approach to the delivery of development and the delivery of future infrastructure works.</u>" to remove the reference to local limitations on the supply and disposal of wastewater. An on-going dialogue will be maintained with the Council to provide information on infrastructure capacity and the delivery of new infrastructure and improvement works.</p>	<p>Accepted but it is recommended that Point 11 of Policy CS9 is amended to read: "Address any local limitations on the <u>disposal of surface water</u>," as Policy CS42 – Development Management, already requires development to be adequately served by essential local infrastructure.</p>
<p>Concerned that the lower designation of Hoylake, compared to West Kirby, will result in a lower focus of services and investment.</p>	<p>No change is recommended. Policy CS25 – Hierarchy of Retail Centres identifies West Kirby as a Town Centre and Hoylake as a District Centre to which the same policies will apply. The only difference is the scale of use that would be assumed to be acceptable before the impact of any in-centre proposal was more closely considered under Policy CS26 – Criteria for Development within Existing Centres, which is currently 2,500sqm in West Kirby and 1,500sqm in Hoylake.</p>
<p>How is the Council to develop its Sailing School at West Kirby?</p>	<p>No change is recommended, as the Core Strategy is not a site specific Local Plan and point 5 of Policy CS9 refers to maintaining and enhancing facilities for visitors, leisure, tourism, coastal recreation and water sports.</p>
<p>What is the justification for continuing to spend taxpayers money developing the "Golf Resort" at Hoylake? When will taxpayers see the reports on this "project" that they have been forced to pay for?</p>	<p>No change is recommended, as the Core Strategy is not a site specific Local Plan and point 5 of Policy CS9 refers to maintaining and enhancing facilities for visitors including provision for leisure, tourism and golf.</p>
<p>Insufficient weight has been given to the effects of sea-level change. If sea-level rises by about 50cms in the next 50 years, then average high tides will flood the car park alongside the Sailing School and Spring Tides will overtop the pavement of South Parade. Given that the climate is changing to become more extreme, there will be more storms and there will be frequent flooding of property in and around South Parade from Riversdale Road to the Sailing Club. Models suggest that anything greater will see flooding as far as West Kirby station from Lingdale Road to Sandy Lane.</p>	<p>No change is recommended, as point 8 of Policy CS9 already refers to the need to "Reduce tidal, river and other flood risks associated with the coastal waterfronts". Policy CS34 – Flood Risk and Coastal Protection and paragraph 23.4 states that 'It will only be appropriate to permit development where it can clearly be demonstrated that there would be no unacceptable risk or impact of flooding, either on the development itself over its lifetime or elsewhere, taking account of the impact of climate change, including sea level rise...' and the flood defence measures listed in Policy CS34 have been informed by the North Wales and North West England Shoreline Management Plan (2011) which forms part of the evidence base of the Core Strategy.</p>

Summary of Comments Received	Recommended Response
Support the priorities that have been developed for this Settlement Area but Policy CS9 could be strengthened by identifying the broad quantum of development to be focused in key locations.	No change is recommended, as the provision of detailed numbers would be over detailed and inflexible and was opposed by respondents to previous consultations. Further information on the potential capacity of the Settlement Area is however available within the supporting evidence base documents and has been used to identify likely future infrastructure requirements in consultation with infrastructure providers.

Policy CS10 – Priorities for Irby, Thingwall, Pensby, Heswall and Gayton

Summary of Comments Received	Recommended Response
Point 4 of Policy CS10 should include the assets in Wirral's leisure and tourism portfolio.	No change is recommended, as Point 4 of Policy CS10 is only intended to provide protection for identified heritage assets.
The Beacons should also be listed under Point 5 of Policy CS10.	No change is recommended with regard to the specific listing of Heswall Beacons but this comment may also be addressed by the further reordering and amendment of point 5 of Policy CS10 recommended below.
Many of Heswall's green spaces, which are crucial to the character of the area and to general well-being, have been neglected. The green environment is important in attracting people to live, invest and build their businesses in Wirral.	No change is recommended, as points 5 and 6 of Policy CS10 already address the strategic priorities within the Settlement Area. Policy CS30 – Requirements for Green Infrastructure, requires new development to contribute towards the provision, protection and enhancement of green infrastructure, supported by Policy CS45 – Developer Contributions.
The word "major" should be omitted from point 5 of Policy CS10, as access to all open space should be maintained and enhanced, including smaller ones such as The Beacons.	Accepted. It is recommended that Point 5 of Policy CS10 is reordered and amended to read: "Maintain and enhance the national and international importance of the foreshore, access to the coast and to the major natural and semi-natural open spaces at Heswall Dales, Thurstaston Common, Arroe Country Park and the Wirral Way <u>and other open space</u> , while maintaining and enhancing their value for landscape, biodiversity and earth science;"
"Earth science" should be replaced with "geodiversity" in point 5 of Policy CS10.	Accepted. It is recommended that point 5 of Policy CS10 is amended to read: "...while maintaining and enhancing their value for landscape, biodiversity and <u>geodiversity</u> ;"
Point 8 of Policy CS10 should include: " <u>and improve the pedestrian experience in the Town Centre</u> " as the vitality and viability of Heswall Town Centre is harmed by the traffic routes, especially Telegraph Road. The emphasis should not just be on maximising highway efficiency. Traffic Management should be a key element of a future Town Plan.	No change is recommended, as Policy CS40 – Transport Requirements, provides for the provision of "accessible, safe and attractive facilities for pedestrians and cyclists, suitable for all abilities and ages..." and the consideration of local solutions is better dealt with through a more detailed Town Centre Action Plan.
Settlement Area 7 also includes the commuter settlement area of Barnston.	Accepted but there is a need to distinguish between the urban areas to the east of Heswall and Barnston Village which is a separate settlement in the Green Belt in Settlement Area 8. Therefore, it is recommended to amend paragraph 15.1 to read: "...the commuter settlements of Irby, Thingwall, Pensby, Heswall, <u>Gayton and the urban parts of Barnston.</u> "

Summary of Comments Received	Recommended Response
Policy CS10 provides the necessary positive strategy to address the conservation and enhancement of the historic environment. The Core Strategy should, however, include explicit coverage of Heritage at Risk as required by Paragraph 126 of the National Planning Policy Framework.	No change is recommended, as there were no entries in the 2012 Heritage at Risk Register within this Settlement Area and Policy CS43 – Design, Heritage and Amenity, provides for proposals that will “safeguard the future of heritage at risk” across the Borough as a whole, including Settlement Area 7.
Settlement Area 7 is being consigned to an unsustainably low level of growth. Infill housing development will not deliver enough jobs and will not meet the existing needs of the young, working age or elderly population.	No change is recommended, as Policy CS10 is only intended to outline the overall priorities for the promotion of sustainable development in the Settlement Area. The forthcoming Strategic Housing Market Assessment will determine the Council’s position in relation to future housing need.
Supports the provision of further residential development in Heswall, to meet local housing needs, including affordable housing. New sites will need to be identified to accommodate growth, such as land at Chester Road, Heswall.	No change is recommended. The forthcoming Strategic Housing Market Assessment will determine the Council’s position in relation to future housing needs.
Supports the provision of further residential development in Irby to meet local housing needs, including affordable housing. New sites will need to be identified to accommodate growth, such as land at Irby Road to the rear of Irby Hall.	No change is recommended. The forthcoming Strategic Housing Market Assessment will determine the Council’s position in relation to future housing needs.
The location specific references to additional pitch requirements should be taken out of Policy CS10, until a revised Playing Pitch Strategy has been completed.	Accepted. It is recommended that Point 6 of Policy CS10 is amended to read: “Increase the provision of allotments and facilities for children and young people and outdoor sports, to meet local needs.”
Point 7 of Policy CS10 should be altered to read: “Reduce the risk of flooding from the Arrowe Brook in Irby and surface water; and <u>consider the availability of water and wastewater infrastructure by working with utility providers to promote a coordinated approach to the delivery of development and the delivery of future infrastructure works.</u> ” to remove the reference to local limitations on the disposal of waste water.	Accepted. It is recommended that Point 7 of Policy CS10 is amended to read: “Reduce the risk of flooding from the Arrowe Brook in Irby and surface water;” as Policy CS42 – Development Management, already requires development to be adequately served by essential local infrastructure.
The commitment to support greater use of the Borderlands railway line is welcomed. Promoting improvements to the line is a key issue for the whole Borough and a key issue for each Settlement Area affected. A stronger policy is required to provide support for improvement works, including improved station facilities, electrification, greater service frequency and direct services to Liverpool, to improve access to jobs and reduce car-based commuting.	No change is recommended, as Point 9 of Policy CS10 will already allow these improvements to be supported, subject to the identification of a viable and suitably funded scheme which can be supported under Policy CS41 – Transport Schemes and through the emerging Core Strategy Infrastructure Plan and Delivery Framework.

Summary of Comments Received	Recommended Response
Support the priorities that have been developed for this Settlement Area but Policy CS10 could be strengthened by identifying the broad quantum of development to be focused in key locations.	No change is recommended, as the provision of detailed numbers would be over detailed and inflexible and was opposed by respondents to previous consultations. Further information on the potential capacity of the Settlement Area is however available within the supporting evidence base documents and has been used to identify likely future infrastructure requirements in consultation with infrastructure providers.

Policy CS11 – Priorities for the Rural Areas

Summary of Comments Received	Recommended Response
Point 6 of Policy CS11 should be altered to read "undeveloped coastal zone" rather than "undeveloped coastline".	No change is recommended, as it is no longer intended to refer to a coastal zone.
The reference to 'local nature reserves' in point 6 of Policy CS11 should be clarified.	Accepted. It is recommended that the Glossary is amended to include sites managed by Cheshire Wildlife Trust and others, as well as those designated, owned and managed by Wirral Borough Council.
Oppose any attempt to take away any further areas of green in Eastham, even if they are currently zoned for employment and to any further development of land adjacent to the Manchester Ship Canal for dock or other industrial use.	No change is recommended, as point 2 of Policy CS7 seeks to maximise the economic contribution of the Eastham Dock Estate.
Seek a policy that will remove once and for all the HGVs that currently infest Eastham's narrow streets and which use Bankfields Drive as a means of access to the Industrial Area.	No change is recommended, as point 4 of Policy CS11 provides for the character and appearance of Eastham Village Conservation Area to be preserved and enhanced and point 12 of Policy CS7 – Priorities for Bebington, Bromborough and Eastham provides for the "impact of HGV's on Eastham Village" to be addressed.
Object to any further housing development in and around Eastham Village, although there may be room for very minor infilling.	No change is recommended, as point 4 of Policy CS11 provides for the character and appearance of Eastham Village Conservation Area to be preserved and enhanced and the area is subject to national Green Belt controls.
Land should be set aside for a footpath between Eastham and Bromborough to join the Wirral Coastal Footpath and to Ellesmere Port.	No change is recommended, as the Core Strategy is not a site specific Local Plan.
The medieval hamlet of Shodwell should be properly archaeologically acknowledged and preserved.	No change is recommended, as the Core Strategy is not a site specific Local Plan and point 4 of Policy CS11 already provides for the protection of designated and un-designated heritage assets.
The property known as Warren Farm should be listed and its current use as a council depot should cease to allow it to revert to a farmhouse.	No change is recommended, as the process of listing buildings is not undertaken by English Heritage and not through the Core Strategy.
Eastham Village School, closed by the Council without consideration as to its future, should be retained at least in part for community use.	No change is recommended, as the Core Strategy is not a site specific Local Plan.
Neglected buildings within the Eastham Conservation Area should be identified and restored to reflect their importance to the area.	No change is recommended as point 4 of Policy CS11 already provides for the character and appearance of the Conservation Area to be preserved and enhanced.
Object to any further development of the remains of Hooton Airfield; the site of Hooton Hall.	No change is recommended, as the remains of Hooton Airfield in Wirral are in the Green Belt.

Summary of Comments Received	Recommended Response
Policy CS11 provides the necessary positive strategy to address the conservation and enhancement of the historic environment. The Core Strategy should, however, include explicit coverage of Heritage at Risk as required by Paragraph 126 of the National Planning Policy Framework. The 2012 Heritage at Risk Register includes Thornton Manor Gardens and Storeton Hall.	Policy CS43 – Design, Heritage and Amenity, already provides for proposals that will “safeguard the future of heritage at risk.” but it is recommended that point 5 of Policy CS11 is also amended to read: “Conserve, enhance and restore the natural beauty, visual amenity and landscape character of the area, in line with the findings of the Wirral Landscape Character Assessment and Cheshire Historic Landscape Characterisation Study <u>and restore the historic park and garden at Thornton Manor;</u> ”.
Settlement Area 8 is being consigned to an unsustainably low level of growth and Policy CS11 will not meet the existing needs of the young, working age or elderly population.	No change is recommended, as Settlement Area 8 is subject to national Green Belt controls. The forthcoming Strategic Housing Market Assessment will determine the Council’s position in relation to future housing need.
Policy CS11 fails to address the needs of the aging population and the local need for affordable and market housing within the Rural Area identified in the Council’s existing Strategic Housing Market Assessment.	No change is recommended, at this stage. The forthcoming Strategic Housing Market Assessment will determine the Council’s position in relation to future housing need.
The commitment to support greater use of the Borderlands railway line is welcomed. Promoting improvements to the line is a key issue for the whole Borough, and a key issue for each Settlement Area affected. A stronger policy is required to provide support for improvement works, including improved station facilities, electrification, greater service frequency and direct services to Liverpool, to improve access to jobs and reduce car-based commuting.	No change is recommended, as Point 11 of Policy CS11 will already allow these improvements to be supported, subject to the identification of a viable and suitably funded scheme which can be supported under Policy CS41 – Transport Schemes and through the emerging Core Strategy Infrastructure Plan and Delivery Framework.
Policy CS11 should be amended to recognise the need for growth in rural areas to sustain rural communities, including the sensitive release of Green Belt to meet future housing requirements.	No change is recommended, at this stage. The forthcoming Strategic Housing Market Assessment will determine the Council’s position in relation to future housing needs. The National Planning Policy Framework already provides for limited infilling in villages, limited affordable housing for local community needs and the re-use of previously developed sites in the Green Belt (NPPF, paragraph 89).
The boundary to Settlement Area 8 should be redefined to exclude the land between Eastham and the M53 Motorway which provides a more defensible Green Belt boundary.	No change is recommended, as the boundary to Settlement Area 8 currently follows the boundary to the Green Belt. The forthcoming Strategic Housing Market Assessment will determine the Council’s position in relation to future housing needs.
Policy CS11 continues to overlook the need for sustainable housing growth within Settlement Area 8.	No change is recommended. The forthcoming Strategic Housing Market Assessment will determine the Council’s position in relation to future housing needs.

Summary of Comments Received	Recommended Response
The rural settlements are socially and economically connected to the rest of the Wirral. Green Belt land needs to be released to provide for their employment and housing needs.	No change is recommended. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing needs. The National Planning Policy Framework already provides for limited infilling in villages, limited affordable housing for local community needs and the re-use of previously developed sites in the Green Belt (NPPF Paragraph 89).
Point 14 of Policy CS11 should be rephrased to read: " <u>Consider the availability of water and wastewater infrastructure by working with utility providers to promote a coordinated approach to the delivery of development and the delivery of future infrastructure works.</u> " to remove the reference to limitations in the supply of water and/or the disposal of waste water. An on-going dialogue will be maintained with the Council to provide information on infrastructure capacity and the delivery of new infrastructure and improvement works.	Accepted. It is recommended that point 14 of Policy CS11 is deleted, as Policy CS42 – Development Management already requires development to be adequately served by essential local infrastructure.
Support the priorities that have been developed for this Settlement Area but Policy CS11 could be strengthened by identifying the broad quantum of development to be focused in key locations.	No change is recommended, as the provision of detailed numbers would be over detailed and inflexible and was opposed by respondents to previous consultations. Further information on the potential capacity of the Settlement Area is however available within the supporting evidence base documents and has been used to identify likely future infrastructure requirements in consultation with infrastructure providers.
The list set out in point 6 of Policy CS11 runs the risk of omitting a potentially important habitat and should be rephrased to read: "...the biodiversity value of <u>all biodiversity and geodiversity assets and wildlife corridors</u> , including any linkages with the surrounding urban areas" supported by appropriate definitions in the Glossary. There is also a good opportunity to join existing sites in accord with the Lawton Report Making Space for Nature.	Accepted. It is recommended that point 6 of Policy CS11 is amended to read: "Maintain and enhance the natural and semi-natural character of the undeveloped coastline; the national and international importance of the inter-tidal foreshores and their supporting habitats; and the <u>value of a linked network of biodiversity and geodiversity assets and wildlife corridors</u> , including any linkages with the surrounding urban areas."
What about opportunities for 'Green' industries?	No change is recommended. Point 7 of Policy CS11 refers to improved woodland management to support biomass production and Policy CS14 - Priority Sectors, supports development that will provide for "greener growth, including construction and supply chain facilities for offshore wind and the low carbon economy."

Summary of Comments Received	Recommended Response
The Rural Area is crossed by high voltage overhead electricity transmission lines which must be retained in-situ unless required to directly facilitate a major development or infrastructure project of national importance identified by central government. Unrestricted and safe access must be maintained at all times and statutory safety clearances must not be infringed.	No change is recommended to Policy CS11 but it is recommended that point 11 of Policy CS42 – Development Management is amended to read: “will not have an unacceptable impact on the operation of Liverpool Airport, Harwarden Aerodrome and the Wallasey Beacon; or <u>the safe and uninterrupted operation of utilities, electricity transmission networks, pipelines, important electrical equipment or instrumentation and their safeguarding zones.</u> ”
Oppose any attempt to take away any further areas of green in Eastham.	No change recommended, as areas outside the existing urban are subject to national Green Belt controls.

Policy CS12 – Wirral Waters

Summary of Comments Received	Recommended Response
<p>Support the inclusion of a specific policy for Wirral Waters but Wirral Waters should be identified as a “Strategic Location” with East Float, West Float and Bidston Dock identified as “Strategic Sites”. These changes are necessary to fully articulate the role and scale of opportunity at Wirral Waters, add certainty and clarity to the level of support for Wirral Waters and make its designation more explicit and to ensure the soundness of Policy CS12.</p>	<p>No change is recommended. The strategic importance and scale of Wirral Waters and each of its different elements is already explicitly identified through the inclusion of Policy CS12 and it would be repetitive and unnecessary to include a series of additional individual and separate policies for each separate element of these proposals. Major development is also provided for in this location within the Spatial Vision; Broad Spatial Strategy; Key Diagram; and in Settlement Area Policies CS4 – Priorities for Wallasey; CS5 – Priorities for the Commercial Core; and CS6 – Priorities for Suburban Birkenhead. National policy states that “Local Plans should indicate broad locations for strategic development on the key diagram and land use designations on a proposals map” (NPPF para. 157). The Core Strategy is not intended to allocate specific sites for development but the location of a new city neighbourhood is already identified on the Key Diagram.</p>
<p>The title to Policy CS12 should be changed to “Wirral Waters <u>Strategic Location for Growth</u>” and new first paragraph should be added to Policy CS12 to say “<u>Wirral Waters, comprising a series of City Neighbourhoods centred around the Birkenhead/Wallasey Dock Estate is designated as a Strategic Location for Growth within the Core Strategy</u>” and the existing first paragraph of the policy should be amended to say “The Council will <u>work with private and public sector partners to secure</u> the delivery of large-scale, high-density, mixed-use, commercial-led development <u>at Wirral Waters to drive</u> economic growth and transformation within Wirral and the wider sub-region.” These changes are necessary to ensure the soundness of the Core Strategy and to better reflect the economic growth potential and scale of the Council’s own aspirations for this scheme.</p>	<p>No change is recommended, as Policy CS12 already states that “The Council will support the delivery of large-scale, high-density, mixed-use, commercial-led development within the Birkenhead Dock Estate at East Float, West Float and Bidston Dock, to support the economic growth and regeneration of the wider sub-region.”</p>
<p>A new paragraph should be inserted in Policy CS12 to say “<u>It is anticipated that a new Town Centre will be designated at East Float through a future review of the Core Strategy reflecting the level of retail and associated development which is expected to be delivered and the role this will play in serving the resident, working and visitor population at East Float.</u>”</p>	<p>No change is recommended. It would be premature to anticipate or commit to the designation of a new town centre at Wirral Waters, as it is not yet clear how or when the proposed town centre uses at East Float will be developed until reserved matters applications have been submitted and implemented.</p>

Summary of Comments Received	Recommended Response
A new paragraph should be added to Policy CS12 to say <u>“Wirral Waters is expected to be delivered over a 40+ year timeframe and therefore will not be delivered in full by the end of the Core Strategy plan period.”</u>	No change is recommended, as Policy CS12 already states that “The precise timetable for delivery is yet to be determined but is expected to extend beyond the period of this Core Strategy” and a reference to potential delivery over the next 40 years is already included in paragraph 18.4.
East Float should be designated as a Strategic Site with a new separate policy <u>“Policy CS12a - East Float Strategic Site”</u> . Paragraph 2 of Policy CS12 should be replaced with a new paragraph to say that <u>“East Float is designated as a Strategic Site. It will be developed for a mix of uses in accordance with Policy CS12a”</u> . Policy CS12a should say that <u>“The Council will work with its developer partners to deliver the comprehensive redevelopment of East Float as part of the Wirral Waters Strategic Location. East Float will be developed to provide a new mixed use City Neighbourhood comprising:”</u> The Proposals Map should be amended to show the boundary of the East Float Strategic Site, as supplied, to reflect the advanced stage of the scheme in the planning process.	No change is recommended, as it would be repetitive and unnecessary to include an additional and separate policy for this element of Wirral Waters, when the information sought by this proposed amendment is already included in Policy CS12. The Core Strategy is not intended to be a site-specific Local Plan and does not have a Proposals Map. It is therefore inappropriate to secure the respondents objectives in the manner suggested.
The reference in Policy CS12 to the amount of housing development at East Float should be amended from “up to 15,200 dwellings” to <u>“around 15,200 dwellings”</u> to provide flexibility and avoid unnecessary and unjustified restrictions on the amount of development.	It is recommended to amend Policy CS12 to read: “up to <u>15,193</u> dwellings” to reflect the maximum amount of development that has been objectively assessed through the outline planning permission for East Float.
The reference in Policy CS12 to the amount of office development at East Float should be amended from “up to 429,800 square metres for offices including research and development, subject to measures to reduce the impact on Liverpool City Centre” to <u>“around 430,000sqm office uses”</u> to provide flexibility and avoid unnecessary and unjustified restrictions on the amount of development and correct the soundness of Policy CS12.	It is recommended to amend Policy CS12 to read: “up to <u>428,794</u> square metres for offices including research and development, subject to measures to reduce the impact on Liverpool City Centre” to reflect the maximum amount of development that has been objectively assessed through the outline planning permission for East Float. The loss of the additional wording in relation to Liverpool City Centre would remove an important safeguard identified in the planning permission and would open the Core Strategy to additional objections under the Council’s statutory duty to co-operate.
The reference in Policy CS12 to the amount of retail and leisure development at East Float should be amended from “up to 102,500 square metres for cultural, leisure, amenity and hotel uses and up to 66,900 square metres for retail uses, subject to the delivery of additional homes and jobs to prevent harm to existing centres” to <u>“around 145,000sqm of cultural, leisure, education, hotel and conferencing, community and amenity facilities”</u> and <u>“around 67,000 sq m of retail uses”</u>	The comments are partially accepted. It is recommended to amend Policy CS12 to read: “up to <u>140,534</u> square metres for cultural, leisure, <u>education</u> , hotel <u>and conferencing, community</u> and amenity <u>facilities</u> and up to <u>66,349</u> square metres for retail uses, subject to the delivery of additional homes and jobs to prevent harm to existing centres”, to reflect the range of uses permitted and the maximum amount of development that has been objectively assessed through the outline planning

Summary of Comments Received	Recommended Response
to provide flexibility and avoid unnecessary and unjustified restrictions on the amount of development and correct the soundness of Policy CS12.	permission for East Float. The loss of the additional wording in relation to harm to existing centres would remove an important safeguard identified in the planning permission and would open the Core Strategy to additional objections under the Council's statutory duty to co-operate and from third parties who specifically requested that these safeguards be included.
Support the reference in Policy CS12 to West Float being developed for industrial, employment and port-related activities but the International Trade Centre at West Float should be designated as a Strategic Site with a new separate policy " <u>Policy CS12b - West Float (ITC) Strategic Site</u> ". Paragraph 3 of Policy CS12 should be replaced with a new paragraph to only say that " <u>Part of West Float is designated as Strategic Site. It will be developed to provide an International Trade Centre in accordance with Policy CS12b.</u> " Policy CS12b should say that " <u>The Council will work with its developer partners to deliver the redevelopment the West Float ITC site as part of the Wirral Waters Strategic Location</u> " specifying the size and type of uses to be permitted and that " <u>Development proposals at West Float ITC will be required to satisfy the relevant development control criteria set out in Policy CS12</u> " The Proposals Map should be amended to show the boundary of the West Float ITC Strategic Site, as supplied, to reflect the advanced stage of the scheme in the planning process.	No change is recommended, as it would be repetitive and unnecessary to include an additional separate policy for this element of Wirral Waters, when the information sought by this proposed amendment is already included in Policy CS12. Policy CS12 already states that "Development at West Float will primarily provide for industrial, employment and port related activities, including the delivery of an International Trade Centre of up to 228,300 square metres and other associated facilities". The amendments suggested would only cover part of the West Float and relate to only one particular development scheme. The omission of a more general reference to industrial, employment and port related activities at West Float would fail to set out the acceptable type of development at this location. The Core Strategy is not intended to be a site-specific Local Plan and does not have a Proposals Map. It is therefore inappropriate to secure the respondents objectives in the manner suggested.
The reference in Policy CS12 to the amount of development at the ITC should be amended from "up to 228,300 square metres and other associated supporting facilities" to " <u>approximately 230,000sqm in size and comprising trade showrooms, storage, ancillary office and management accommodation, distribution and product assembly space, exhibition space, ancillary food and drink uses and car parking, up to 115,000 sq m of which will be permitted for general distribution and industrial use</u> " to reflect the existing outline planning permission for the site and correct the soundness of Policy CS12.	The comments are partially accepted. The existing wording in Policy CS12 reflects the maximum amount of development that has been objectively assessed through the outline planning permission for the ITC at West Float. It is however recommended the wording related to the range of uses permitted should be amended in Policy CS12, to read: "Development at West Float will primarily provide for industrial, employment and port-related activities, including the delivery of an International Trade Centre <u>which will provide</u> up to 228,300 square metres <u>of floorspace comprising trade showrooms, storage, distribution and product assembly space, exhibition space, ancillary food and drink facilities, ancillary office and management accommodation, security facilities and associated car parking.</u> Up to 116,529 square metres of the <u>overall floorspace will be permitted for general distribution and industrial use</u> ".

Summary of Comments Received	Recommended Response
<p>Support the reference in paragraph 4 of Policy CS12 to the complementary development at Bidston Dock but consider Policy CS12 would benefit from further elaboration to correct the soundness of the Core Strategy. While the proposals for Bidston Dock are not sufficiently advanced to warrant designation as a Strategic Site, the current wording does not reflect its importance to the delivery of the overall vision for Wirral Waters as set out within the Strategic Regeneration Framework for Wirral Waters which has been endorsed by the Council and forms part of the Core Strategy evidence base.</p> <p>“Complementary development” is a poorly defined term. Policy CS12 should clarify that Bidston Dock will be developed as a major nationally important leisure and retail destination, planned in a way which ensures it complements Birkenhead Town Centre and other town centres in the Borough, providing a differentiated retail and leisure offer which does not exist in Wirral at present, serving to enhance Wirral’s investment and visitor profile and contribute towards realising Wirral Waters’ full potential as a world class visitor destination.</p> <p>Paragraph 4 of Policy CS12 should be replaced with a new paragraph to say <u>“Bidston Dock will be developed as a major new retail and leisure destination to complement development at East Float and to contribute to the economic transformation and regeneration of Wirral and the wider City Region. It will be planned and delivered in a manner which complements the retail and leisure offer at Birkenhead Town Centre and other designated centres within the Borough.”</u> Any spatial reference to “the area” should be taken to mean the City Region, to avoid unrealistic expectations about how Bidston Dock will be developed over the plan period.</p>	<p>The comments are partly accepted but no change to the main substance of Policy CS12 is recommended. Policy CS12 currently states that “Development at Bidston Dock will provide for complementary development that will further support the economic revitalisation of the area, without causing harm to existing centres or facilities.” No specific land-uses are identified. The preamble to Policy CS12 already indicates that development at East Float, West Float and Bidston Dock is intended to support the economic growth and regeneration of the wider sub-region.</p> <p>Other respondents have asked for further detail on the intended nature and scale of development at Bidston Dock arising from a concern about the potential impact of a new retail or leisure development, including on adjoining local authorities. There is currently a lack of sufficiently detailed evidence to support a reference to Bidston Dock being developed as a major new retail and leisure destination at this stage. Paragraph 18.6 already states that additional justification will be required for further development at Bidston Dock and that proposals will need to be considered against the wider framework of the Core Strategy and national policy.</p> <p>The promotion of major retail and leisure in this location would require a detailed assessment of the impacts and alternatives to satisfy national policy (NPPF paragraphs 23-26 refer). A “major nationally important leisure and retail destination” would trigger significant cross-boundary impacts that would need to be fully evidenced and quantified and agreed through the Council’s statutory duty to co-operate before they could be included in the Core Strategy. The Council endorsed the Wirral Waters Strategic Regeneration Framework Baseline Study for public consultation insofar as it related to Wirral Waters proposals at that stage (Minute 148). The Baseline Report does not however provide any detailed proposals for the future use of Bidston Dock.</p> <p>The amendments suggested would not address harm to existing centres and facilities outside of the Borough in line with Policy CS29 and would open the Core Strategy to additional objections under the duty to co-operate. It is accepted that complementary development’ is poorly defined even though the suggested revised text also uses similar</p>

Summary of Comments Received	Recommended Response
	wording. It is therefore only recommended to re-word paragraph 4 of Policy CS12 to say “ <u>Bidston Dock will provide for development that will further support economic revitalisation without causing harm to existing centres or facilities.</u> ” A reference to the Liverpool City Region has not been included, as it is already included in the opening paragraph of Policy CS12.
Point 2 of the list of criteria in Policy CS12 should be amended to make it clear that a contribution to affordable housing in line with Policy CS22 is only required where viable.	No change is recommended, as the need to address viability is already clearly addressed in Policy CS22.
Point 5 of the list of criteria in Policy CS12 should be amended to make it clear that the requirement to incorporate low carbon initiatives to minimise energy demands and maximise the use of low carbon and/or renewable energy should only be required where viable.	Accepted. The Wirral Waters Strategic Regeneration Framework states that the strategy is to create an exemplar, low carbon, low resource demand, sustainable development that will meet national and regional policy targets in respect of sustainability providing project viability allows (Guiding Principles Paragraph 3.12 refers). It is therefore recommended that Point 5 of Policy CS12 is amended to read: “incorporate low carbon initiatives to minimise energy demands and maximise the use of low carbon and/or renewable energy <u>where viable;</u> ”
Point 7 of the list of criteria in Policy CS12 should be altered to say “include measures that will secure full integration with surrounding areas, including the historic grid iron street layout and Hamilton Square Conservation Area, <u>and the provision of direct and convenient pedestrian and cycling routes to the stations at Birkenhead Park, Conway Park and Hamilton Square.</u> ”	No change is recommended, as these are matters to be considered as part of the public transport and access strategy which is already required under Point 7 of Policy CS12.
Point 8 of the list of criteria in Policy CS12 should be amended to say “ <u>unacceptable</u> harm to the setting or views from Hamilton Square Conservation Area”.	Accepted. It is recommended to amend Point 8 of Policy CS12 to read: “ensure that the impact of any tall buildings will not cause <u>unacceptable</u> harm to the setting or views from Hamilton Square Conservation Area”. This amendment will, however, need to be confirmed with English Heritage under the duty to cooperate.
It would be useful if Policy CS12 included details of the phasing of development, to make clear when the 15,200 dwellings will be delivered. Such details need to be robustly assessed and explained.	No change is recommended, as separate figures are already shown for Wirral Waters in Table 20.2 – Housing Land Supply April 2012 and further information is and will be included in the Council’s Strategic Housing Land Availability Assessment Updates and statutory Monitoring Reports.

Summary of Comments Received	Recommended Response
<p>Welcome the statement that new retail development at Wirral Waters will be "subject to the delivery of additional homes and jobs to prevent harm to existing centres" and the requirement to prevent harm to existing centres in neighbouring authorities but still remain concerned about future scale of retail and leisure uses proposed at Wirral Waters and the associated impacts on existing centres within Cheshire West and Chester. Additional information should be provided to explain why out-of-centre retail and leisure development of such a large scale is justified and how it will be ensured that if it comes forward it will not have a detrimental impact on existing centres.</p>	<p>No change is recommended as Policy CS12 already states that retail and leisure development at East Float will be "subject to the delivery of additional homes and jobs to prevent harm to existing centres" and that development at Bidston Dock must not cause harm to existing centres or facilities. Paragraph 18.6 already indicates that "further development will require additional justification and any subsequent proposals at Bidston Dock and/or West Float will need to be considered against the wider framework of this Core Strategy and national policy requirements".</p>
<p>There remains significant ambiguity as to whether or not further retail floorspace elsewhere at Wirral Waters would be acceptable going forward. The draft policy specifies what floorspace would be acceptable at East Float, but it does not set floorspace thresholds for Bidston Dock- an area which has previously been considered appropriate by developers Peel as a possible location for destination leisure and retailing (Wirral Waters Strategic Regeneration Framework, 2009). Cross-reference to Draft Policy CS29 should be included to make absolutely clear that additional retail floorspace would be subject to rigorous policy tests before it can be allowed to come forward. The supporting test should make absolutely clear that any additional retail floorspace at Wirral Waters and the surrounding area (over and above that which has already been approved) must be accompanied by a robust evidence base, part of which will need to demonstrate that it will not lead to significant adverse impacts on existing and planned investment elsewhere in the region.</p> <p>As worded the Core Strategy could have significant effects beyond the locality of the Borough and serves only to compound concerns that unfettered retail development outside the established hierarchy of centres will have significant adverse impacts on Liverpool One and the City Centre as a whole. The Council should strengthen its policies in connection with Wirral Waters so that it is made absolutely clear that destination retail is not planned for in this location and will not be allowed to come forward unless it can be comprehensively demonstrated that it will not be to the detriment of the region's sustainable economic future.</p>	<p>No change is recommended in direct response to these comments. Policy CS12 states that "Development at Bidston Dock will provide for complementary development that will further support the economic revitalisation of the area, without causing harm to existing centres or facilities." No specific land-uses are identified and there are currently no proposals for the site. The preamble to Policy CS12 already indicates that development at East Float, West Float and Bidston Dock is intended to support the economic growth and regeneration of the wider sub-region.</p> <p>In response to comments from another respondent it is recommended that Policy CS12 is amended to reflect the maximum amount of development already approved at East Float and West Float. The reasoned justification states at paragraph 18.6 that additional justification will be required for further development at Bidston Dock and that any proposals will need to be considered against the wider framework of the Core Strategy and national policy. This would include Policy CS29 of the Core Strategy and the national policy requirement for sequential test and impact assessment (NPPF para 23-26 refers).</p> <p>In response to comments from another respondent it has been accepted that 'complementary development' requires further definition and it is recommended to re-word paragraph 4 of Policy CS12 to say "Bidston Dock will provide for development that will further support economic revitalisation without causing harm to existing centres or facilities".</p>

Summary of Comments Received	Recommended Response
<p>Whilst recognising the significant regeneration benefits of Wirral Waters, the type and quantum of development at Bidston Dock, the potential impact on Liverpool City Centre as the Regional Centre and the interpretation of 'complementary development' are still unclear. The statement that "any subsequent proposals at Bidston Dock and/or West Float will need to be considered against the wider framework of this Core Strategy and national policy requirements" could still allow uses which could potentially impact on Liverpool City Centre, given the overall support for "the delivery of large-scale, high-density, mixed-use, commercial-led development within the Birkenhead Dock Estate at East Float, West Float and Bidston Dock, to support the economic growth and regeneration of the wider sub-region". Neither Policy CS12 nor its supporting text refers to the need to consider future proposals in the context of Liverpool City Centre as the Regional Centre. Given that the Wirral Retail Study Update (2012) concludes that there is no need for any additional convenience goods floorspace in Wirral to 2030 and very little need for comparison goods, any new retail floorspace at Bidston it is likely to result in clear impacts on existing centres both in Wirral and Liverpool.</p>	<p>No change is recommended. It has already been recommended to remove the reference to 'complementary development' from paragraph 4 of Policy CS12 and no specific land-uses have been identified. The statement in paragraph 18.6, the requirement that any development at Bidston must not harm existing centres and facilities and the requirements of Policy CS29 – Criteria for Edge-of-Centre and Out-of-Centre Facilities, which specifically provides for the protection of centres within adjacent authorities, should provide adequate safeguards.</p>
<p>Welcome the requirement for new office development at East Float to reduce the impact on Liverpool City Centre and the link between any new retail development and the delivery of additional homes and jobs at East Float to prevent harm to existing centres. It is not, however, clear whether Liverpool City Centre would be included in the reference to "existing" centres. Whilst welcoming the references in the Background to the Core Strategy and the supporting text for Policy CS25 and the clause in Policy CS29 requiring proposals to demonstrate no significant adverse effect on the vitality and viability of centres designated in the adopted Local Plan of an adjacent authority, there is still a need to refer to Liverpool City Centre as the Regional Centre in Policy CS12, given the scale of development involved and the lack of clarity regarding future development proposals.</p>	<p>No change is recommended, as the existing references to "existing centres" in Policy CS12 and the provisions in Policy CS29 – Criteria for Edge-of-Centre and Out-of-Centre Facilities, are considered to be adequate to prevent harm to Liverpool City Centre as well as to other centres in Wirral and Cheshire West and Chester.</p>
<p>Policy CS12 is unrealistic in terms of the delivery of Wirral Waters over the plan period, with a precise timetable not yet established, despite the existence of an outline planning permission. The amount of development indicated in Policy CS12 appears to go beyond the extant planning permission and the assessments on which it was based.</p>	<p>No change is recommended, as the figures included in Policy CS12 relate to development that has already been objectively assessed and approved or recommended for approval subject to the signing of legal agreements.</p>

Summary of Comments Received	Recommended Response
<p>It is unclear whether Wirral Waters is intended to meet local needs or is intended to provide housing above the Regional Spatial Strategy requirement on the basis of the original Growth Point aspirations referred to at paragraph 18.2 and the fact that 70 percent of the occupants are expected to be new migrants. The scale of development proposed has not been subject to sufficient scrutiny in terms of impact and the degree to which the scheme is able to be delivered. Paragraph 19.23 highlights that the viability of employment development is a significant issue. The viability of housing is also a significant issue. The delivery of affordable housing is subject to viability testing but it is apparent that the ability for this development to meet existing identified housing needs is limited.</p>	<p>No change is recommended, as the figures included in Policy CS12 relate to development that has already been objectively assessed and approved or recommended for approval subject to the signing of legal agreements, including referral to the Secretary of State and the delivery of development at Wirral Waters has formed a prominent part of the Council's background evidence base. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need.</p>
<p>Recognise the need for a site-specific policy to bring forward development on this site to support economic growth and regeneration but the future five year housing land supply will be highly dependent on delivery of Wirral Waters. The Impact Matrix for Policy CS12 acknowledges that Wirral Waters could be held back by the capacity of utilities and other supporting infrastructure, which could undermine regeneration and place pressure for development on other areas of the Borough.</p>	<p>No change is recommended, as Policy CS20 – Housing Contingencies and an assessment of the future housing land supply both with and without Wirral Waters has been included within the Core Strategy and its background evidence documents. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need.</p>
<p>The deliverability and viability of Wirral Waters is doubtful now that work has not started since the main planning consent was granted and no application for reserved matters has yet been submitted. Given the focus on Wirral Waters within the Core Strategy, the suggestion that this consent is likely to be implemented beyond the plan period suggests that the Core Strategy may not be "effective" and will be found unsound in its present form.</p>	<p>No change is recommended, as it was never expected that Wirral Waters would be fully completed by the end of the plan period and a phased delivery over time has always been included in the Council's background evidence. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need but Policy CS20 – Housing Contingencies, sets out what will happen if new housing does not come forward at Wirral Waters and alternative sites sufficient to provide an ongoing housing land supply have not obtained planning permission.</p>
<p>If no Wirral Waters - what then?</p>	<p>No change is recommended. Policy CS20 – Housing Contingencies, sets out what will happen if new housing does not come forward and alternative sites sufficient to provide an ongoing housing land supply have not obtained planning permission.</p>

Summary of Comments Received	Recommended Response
<p>The Sustainability Appraisal Summary for Policy CS12 should be re-considered. The recorded impacts on retailing, town centres, heritage, flooding and culture are unwarranted and do not reflect the mitigation measures identified in outline consents, which will ensure that any adverse impacts are reduced to an acceptable level. The text should be amended to delete the reference to “uncertain impacts” and say “...<u>Potential impacts relating to retailing, town centres, heritage, flooding, culture and sport and reserved matters applications will be mitigated through the detailed design of the scheme, other policies within the Core Strategy relating to development management and appropriately worded conditions attached to future planning permissions.</u>”</p>	<p>No change is recommended, at this stage. The sustainability appraisal was prepared in consultation with an independent Sustainability Appraisal Panel. The comments raised will be reported back to the Panel, when the changes being proposed to each policy are re-appraised prior to submission to the Secretary of State. It may be inappropriate to include no uncertain impact if some final solutions are still to be agreed.</p>

Policy CS13 – Employment Land Requirement

Summary of Comments Received	Recommended Response
It is unclear whether paragraph 19.8 is equivalent to the "very special circumstances" that must be applied to applications for inappropriate development in the Green Belt under national policy.	Accepted. It is recommended to amend the reasoned justification by deleting paragraph 19.8 which currently states "The Council has resolved that only a redevelopment opportunity of exceptional economic and employment significance would be considered in the Green Belt, because of the potential to accommodate significant levels of higher density development in and around Wirral Waters and Birkenhead Town Centre."
Development of 'exceptional economic and employment significance' should be better defined as this will allow the Green Belt to be allocated for development without defining precisely in what circumstances this might happen.	Accepted. It is recommended to amend the reasoned justification by deleting paragraph 19.8 which currently states "The Council has resolved that only a redevelopment opportunity of exceptional economic and employment significance would be considered in the Green Belt, because of the potential to accommodate significant levels of higher density development in and around Wirral Waters and Birkenhead Town Centre."
The Wirral Employment Land and Premises Study (ELR) considers a range of methodologies for predicting economic growth and land requirements over the plan period. The ELR however does not identify a preferred approach and Policy CS13 appears to take a position at the top end of the range presented without sufficient justification or analysis, calculated to reflect the policy on position of the 2007 Wirral Investment Strategy. The ELR does not reflect the latest Investment Strategy dated 2011. The 2007-based figures pre-date the current economic climate and do not take into account the impact of the recession. The additional 55ha associated with delivering the Investment Strategy, cannot be found within the Investment Strategy and the methodology for reaching this number is not set out within the original ELR or the 2012 Update. The 2007-based requirements are added to historic take-up rates to form the top end of the range of requirements within the ELR. It is inappropriate to assume that future employment land requirements will follow the scale and pattern of historic development within Wirral and do not reflect the current requirements of businesses or market constraints including access to finance. The ELR presents no analysis of these historic take-up rates before identifying it as the appropriate basis for policy. The 2012 Investment Strategy notes the need to address quality and quantity issues in the employment land supply and prioritises key sites which do not include Moreton.	The Wirral Employment Land and Premises Study recognised that historic take-up rates are a better reflection of the actual demand for land in Wirral and recommended that a further allowance was made to account for the needs of the Council's Investment Strategy. The use of historic take-up rates is considered to be a robust and flexible approach as data for the last 15 years takes account of the full economic cycle. Work to update the allowance for the needs of the Investment Strategy, reported to Cabinet on 27 September 2012, is now complete and indicates a revised additional requirement of 36ha, compared to the 53ha previously applied, based on the earlier analysis contained within the Wirral Enterprise Strategy 2007. It is therefore recommended to amend Policy CS13 to read: "A minimum of <u>200</u> ha of land will be required to accommodate new employment development for B1, B2 and B8 uses..." It is also recommended to amend paragraph 19.2 to read: "The Council's Enterprise Strategy originally estimated that raising the Borough's economic activity and business stock towards the regional average would require an additional 55 hectares of land to be developed by 2016. The latest calculation indicates that this figure should now be approximately <u>36</u> hectares."

Summary of Comments Received	Recommended Response
<p>Paragraph 19.6 refers to “High scoring sites, close to main roads and in high profile locations...at Moreton...” The allocated site immediately adjacent to the Burtons Foods site scored 4/10 for M53 road proximity, prominence and market availability. Tarran Industrial Estate scored 6/10 for M53 road proximity and 3/10 for prominence and market availability. There is therefore no evidence to support the conclusion that Moreton contains high scoring and high profile sites and the specific references to Moreton need to be revised.</p>	<p>No change is recommended as Policy CS13 is not site-specific and states that the allocation of individual sites will be considered in a future site-specific Local Plan. References to Moreton refer to the employment area as a whole. The Moreton employment area is identified in the Employment Land and Premises Study as a Key Employment Area, “of a size to create presence and able to accommodate a range of uses”. Other factors than “M53 road proximity”, “site prominence” and “market availability” contribute to the overall market-led site score. In Wirral, market-led scores are generally poor, with only 20 sites (17%) achieving a score of 50% or more. Of these sites, 3 are located within the Moreton employment area (Site 8, Premier Brands – Reeds Lane, site 65, Premier Brands – Pasture Road, and site 251, Nextdom – Reeds Lane) and the Study recommends that all existing employment land in west Wirral (including Moreton) is retained (recommendation 7 refers). Policy CS17 – Protection of Employment Land provides for site specific assessments where evidence relating to need, marketing, land supply, land use and the character of the surrounding area can be taken into account.</p>
<p>The Core Strategy fails to recognise that investment and job creation needs to be adequately served by new homes in sustainable locations; not simply in Birkenhead.</p>	<p>No change is recommended because Policy CS13 is simply about quantifying the amount of land required for employment purposes over the lifetime of the Core Strategy. The forthcoming Strategic Housing Market Assessment will determine the Council’s position in relation to future housing need.</p>
<p>Object that only “redevelopment opportunities of exceptional economic and employment significance would be considered in the Green Belt” which should be amended to recognise the need to adopt a flexible approach to economic growth which does not seek to restrict employment uses and is more responsive to changing needs and demands and economic circumstances. Policy CS13 should reflect 'Strategic Objective 3 - Transport Accessibility' and promote new development in locations with easiest access to existing centres, high frequency public transport corridors, pedestrian and cycle routes.</p>	<p>No change is recommended to Policy CS13. It is recommended to delete paragraph 19.8 which states "The Council has resolved that only a redevelopment opportunity of exceptional economic and employment significance would be considered in the Green Belt, because of the potential to accommodate significant levels of higher density development in and around Wirral Waters and Birkenhead Town Centre." in response to other representations. The promotion of new employment development in sustainable locations is already covered in Policy CS2 – Broad Spatial Strategy, Policy CS15 – Criteria for Employment Development, Policy CS40 – Transport Requirements and Policy CS42 – Development Management and transport requirements will be considered when sites are allocated in a future site-specific Local Plan.</p>

Summary of Comments Received	Recommended Response
<p>Support the need to deliver 217 hectares of employment land but concerned at the potential to deliver this quantity of land from the existing employment land supply. The Wirral Employment Land and Premises Study shows that: 84 hectares of employment space is envisaged at Wirral Waters; 141 hectares is constrained for at least the medium term by a lack of servicing; only 5.14 hectares is immediately available for development; current commitments amount to only 3.46 hectares; 100.17 hectares may not come forward for new employment development, and there is very little property or land available to the west of the M53 Motorway. There is therefore a need for additional land to be identified in the Green Belt, without which the Core Strategy cannot be “positively prepared” or “justified” as the most appropriate strategy when considered against the reasonable alternatives.</p>	<p>No change is recommended. Although it is recommended that the latest figures for April 2013 should be included in the final Core Strategy, the reduction in the land required to meet the aspirations of the Wirral Investment Strategy, the overall amount of land currently available for employment uses, as shown in Table 19.1, and current market conditions are unlikely to justify the release of land from the Green Belt for additional employment development.</p>
<p>New employment development, especially on ‘green’ land, cannot be ‘sustainable’ when so many office/industrial units built in recent years are not occupied. A better assessment of need is required.</p>	<p>No change is recommended, as Policy CS13 seeks to define the minimum land required to provide a flexible range and choice of sites and to raise the Borough’s business stock and economic activity towards the regional average, which will be allocated in a future site-specific Local Plan and the amount of existing vacant property has been taken into account in the calculation of the additional land requirement associated with the delivery of the Investment Strategy.</p>
<p>It is not clear how the overall scale of provision identified in Policy CS13 will be distributed across the different Settlement Areas.</p>	<p>No change is recommended, as detailed development scenarios have already been provided to the respondent, to allow the consideration of appropriate infrastructure requirements and the respondent does not currently have any concern regarding the soundness of the Core Strategy.</p>
<p>Further clarification is needed on the level and type of employment development expected within the Dock Estates. Un-related employment uses should not be supported and operational port land within the Dock Estates should not form part of the Council’s overall general employment land supply, to ensure that this land is retained in port and port related use as a specialised area of the sub-regional economy and as a driver of growth.</p>	<p>It is recommended that Policy CS14 is amended to delete the text “including land within the Dock Estates” from the first paragraph. It is, however, for port operators to restrict un-related employment uses within the designated Dock Estates. Operational port sites will continue to be included within the Borough’s employment land supply because the calculation of future employment needs has included future port-related employment; port sites represent 26% of the current land supply (67.58 ha) and 10% of sites numerically; and the Wirral Employment Land and Premises Study Update (2012) recommended that they should continue to be included as part of the Borough’s employment land supply.</p>

Summary of Comments Received	Recommended Response
Table 19.1 should be amended to refer to 'Dock Estate Sites' rather than 'Port Sites'.	Accepted. It is recommended that Table 19.1 is amended to refer to 'Dock Estate Sites'.

Policy CS14 – Priority Sectors

Summary of Comments Received	Recommended Response
No evidence is presented to support the assumption that traditional employment areas could deliver premises that modern companies need, through re-use of existing buildings or redevelopment and no regard has been given to the locational requirements of these businesses to justify this being identified as a priority sector.	No change is recommended, as Policy CS14 is an enabling policy that will proactively provide for new and emerging business sectors in support of Wirral's Investment Strategy and Local Enterprise Partnership objectives, in conformity with national policy, and for the renewal and regeneration of traditional employment areas. The Wirral Employment Land and Premises Study included a general assessment of the likely combined attractiveness; suitability and viability of all the Borough's existing employment areas to identify an Employment Area Hierarchy, which is reflected in Policy CS2 – Broad Spatial Strategy. Policy CS17 – Protection of Employment Land provides for site-specific assessments where evidence relating to need, marketing, land supply and the character of the surrounding area can be taken into account.
Advanced manufacturing should be added as a priority sector in Policy CS14.	No change is recommended, as advanced manufacturing is already identified under bullet point 4 of Policy CS14.
The evidence base does not include an analysis of the specific requirements of start-up, micro, or small and medium sized enterprises to justify this being identified as a priority sector.	No change is recommended, as evidence of need to provide smaller premises is identified in the Wirral Employment Land and Premises Study supported by commercial property market data which confirms the small business emphasis of Wirral's economy, as well as specific requirements, such as serviced office space. The latest Wirral Economic Profile (November 2012) shows that the percentage increase in new businesses in Wirral since 2011 is higher than both the North West and UK averages of 2.3% and 3.4% respectively. Micro-businesses make up the largest share of enterprises in Wirral at 73% and there has been a 3.4% increase in the number of enterprises employing 0-4 employees over the last 12 months, the highest percentage increase for this employment band in the Liverpool City Region.
A new bullet point should be included in Policy CS14 to read: " <u>Port and port related development within the Dock Estate areas at Eastham (Port Wirral and QEII Dock) and Birkenhead, including port-related employment and activities, manufacturing, logistics, maritime, renewable and low carbon energy and heavy engineering sectors</u> " to reflect the sectoral priorities established by the Local Enterprise Partnership as part of the SuperPort initiative for port-centric distribution and logistics.	Agreed but as the low carbon economy is already included in bullet point 3 and manufacturing is already identified in bullet point 4, it is recommended that Policy CS14 is only amended to include an additional bullet-point to read: " <u>port-centric, distribution, logistics, maritime and heavy-engineering sectors;</u> " It is, however, also recommended to amend paragraph 19.9 to read: "The Investment Strategy proposes an increased emphasis on key growth sectors to build on existing specialisms and opportunities presented by Wirral's geography, including port uses,

Summary of Comments Received	Recommended Response
	research and development, low carbon, offshore energy, biomedical and advanced technology and manufacturing". The geographical references have not been accepted because there are other areas of the Borough which could provide locations for port and port-related development and the appropriate locations are already listed under Policy CS16 – Criteria for Port-Related Development.

Policy CS15 – Criteria for Employment Development

Summary of Comments Received	Recommended Response
<p>The reference in Policy CS15 to 'other similar uses' is ambiguous and is not consistent with Policy CS17 – Protection of Employment Land, which would currently require 'other similar uses' to be the subject of stringent testing before approval. Policy CS15 should be more positive in fostering enterprise and job creation for uses falling within Use Classes B1, B2 and B8 and other businesses.</p>	<p>Accepted. It is recommended that Policy CS13 – Employment Land Requirement is amended to read: “A minimum of 217 hectares of land will be required to accommodate new employment development for B1, B2, B8 <u>and other similar employment uses</u> between 2012 and 2028...” and that Policy CS15 is amended to read: “New employment development to provide new or additional floorspace for B1, B2, B8 and other similar <u>employment uses</u>, including conversions and changes of use, will be permitted where proposals can be demonstrated to:” It is also recommended that paragraph 19.14 is amended to read: “The Council will take a flexible approach to new high quality employment development for B1, B2, B8 <u>and other similar employment uses, such as industrial or construction training facilities; vehicle hire, sales and repair businesses; builders merchants; and taxi businesses.</u> in line with the presumption in favour of sustainable development <u>and</u> in the interests of maintaining and increasing levels of employment and developing a sustainable local economy.”</p>

Policy CS16 – Criteria for Port Related Development

Summary of Comments Received	Recommended Response
Point 1 of Policy CS16 should read “be well related to the Strategic Freight Network <u>and connected to the rail freight network</u> ”, as it is essential to have rail access to deliver a sustainable pattern of activity.	No change is proposed, as Point 3 of Policy CS16 already requires proposals to: “contribute towards the reduction of greenhouse gas emissions, through the more efficient use of rail and water transport”. As not all dock facilities have access to rail transport it would be unreasonable and unduly restrictive to require it in all cases before planning permission was granted, if other impacts were acceptable. The greater use of sustainable transport is also supported under Policy CS40 – Transport Requirements.
Policy CS16 should be amended to read: “ <u>Where permitted development rights do not apply...</u> ” to reflect the existing rights for port-related storage and distribution within the existing Dock Estates.	Accepted but a simplified wording is recommended to read: “Port and marine-related development <u>requiring planning permission</u> will be permitted within the existing Dock Estates at Birkenhead and Eastham; at Twelve Quays; along the Tranmere waterfront at Cammell Lairds; and along the Bromborough Coast; where proposals will...” It is also recommended to amend paragraph 19.18 to read: “Most port-related development <u>for storage and distribution</u> within the existing boundaries of the Dock Estates...”
Criterion 5 of Policy CS16 should be amended to read: “...have no <u>unacceptable</u> adverse impact...”, as the National Planning Policy Framework only provides for development to be refused where there will be significant harm to biodiversity which cannot be mitigated or compensated for.	Accepted but any revised wording must also reflect the statutory requirements of regulation 61 of the Habitats Regulations. It is therefore recommended that criterion 5 of Policy CS16 is amended to read: “have no <u>unacceptable</u> adverse impact on water quality or <u>adverse effect</u> on designated European Sites or their supporting habitats”, subject to the approval of the Environment Agency and Natural England.
The Sustainability Appraisal Summary for Policy CS16 should be re-considered. Negative comments are unjustified as mitigation measures can be employed. The text should be amended to delete the reference to “uncertain impacts” and say: “... <u>Potential</u> effects related to heritage, noise and light pollution and traffic intrusion, particularly with regard to Eastham Village and related to waste and energy consumption are mitigated by Policy CS7, Policy CS34, Policy CS35, Policy CS39, Policy CS40, Policy CS42 and Policy CS43. <u>These potential effects will also be mitigated through the detailed design of the scheme and use of appropriate conditions attached to future planning permissions.</u> “	No change is recommended, at this stage. The sustainability appraisal was prepared in consultation with an independent Sustainability Appraisal Panel. The comments raised will be reported back to the Panel, when the changes being proposed to each policy are re-appraised prior to submission to the Secretary of State. It may not be appropriate to include the uncertain impacts if final solutions are still to be identified and agreed.

Policy CS17 – Protection of Employment Land

Summary of Comments Received	Recommended Response
The requirement to consider suitability for priority sectors is unjustified, contrary to national policy, restrictive and inflexible.	No change is recommended to point 1 of Policy CS17, as it is not unreasonable to ensure that a site would not be suitable for an identified priority sector before an alternative use is considered. Policy CS17, as currently worded, provides sufficient flexibility to allow alternative uses to be considered in the event that it can be demonstrated that there was no realistic prospect of employment uses coming forward on the site under consideration.
National policy states that planning policies should avoid the long term protection of sites allocated for employment uses where there is no reasonable prospect of a site being used for that purpose. There is no justification for a two year marketing period which is contrary to the more flexible approach required by national policy.	It is recommended that a 12 month period is adopted in line with other representations to Policy CS17, reported below.
The requirement to consider the needs identified in Policy CS13 is not justified when the quantitative need has been overstated, having regard to the evidence base.	No change is recommended, as this representation is mainly directed at Policy CS13 – Employment Land Requirement.
The link to an ongoing 5-year supply of housing land is unduly restrictive and does not allow for residential use where there is no reasonable prospect of securing an alternative, viable employment use without appropriate cross-subsidisation. Policy CS17 should allow the material benefits of delivering housing as part of viable regeneration schemes to be considered even when there is already a demonstrable 5-year supply, to support viability in line with paragraph 19.23.	No change is recommended, as the Wirral Employment Land and Premises Study has concluded that there is a shortage of immediately available employment land in Wirral and that the loss of a large proportion of existing premises to alternative uses could seriously affect the Borough's ability to maintain a credible future supply of attractive employment floorspace. It is, therefore, reasonable to expect any release for residential development to be justified in the light of the prevailing housing land supply.
Paragraph 19.21 is contrary to national policy which states that the long term protection of employment sites should be avoided "where there is no reasonable prospect of a site being used for that purpose" and essentially continues to promote an inflexible protectionist approach to employment land.	No change is recommended, as national policy expects local plans to be based on a strategy to meet the objectively assessed needs for new employment development (NPPF, paragraph 182 refers). The Wirral Employment Land and Premises Study has concluded that there is a shortage of immediately available employment land and in Wirral that the loss of a large proportion of existing premises to alternative uses could seriously affect the Borough's ability to maintain a credible future supply of attractive employment floorspace. Policy CS17 as currently worded provides sufficient flexibility to allow alternative uses to be considered in the event that it can be demonstrated that there is no realistic prospect of employment uses coming forward on any particular site.

Summary of Comments Received	Recommended Response
<p>Policy CS17 is inconsistent with Policy CS15 – Criteria for Employment Development and fails to recognise the opportunity for businesses falling outside Use Classes B1, B2 and B8 to contribute towards the revitalisation of the economy. Policy CS17 should aim to protect existing employment land for all uses which promote enterprise, job creation and contribute to the local economy. The restrictions on alternative uses should only apply to uses that would not contribute to job creation or the local economy.</p>	<p>Accepted. It is recommended to amend Policy CS17 to read: “Land will be safeguarded within designated employment areas to maintain <u>and create</u> local employment...” and to read: “Alternative uses will only be acceptable on land designated for B1, B2, B8 <u>or other similar employment</u> uses where:”</p>
<p>A 2 year marketing period is considered onerous. Other Councils apply a 12 month period.</p>	<p>Although a 2 year marketing period is only a short-term protection, it is recommended that point 2 of Policy CS17 is amended to read: “the site has been continuously marketed for employment uses at realistic prices for a period of at least <u>12 months</u> and there is no reasonable prospect of the site being re-used for employment uses;” to bring Policy CS17 in line with the requirements of other Councils.</p>
<p>A 2 year marketing period is too onerous and runs counter to national policy in paragraph 22 of the National Planning Policy Framework. 12 months would be more than sufficient.</p>	<p>Although a 2 year marketing period is only a short-term protection, it is recommended that point 2 of Policy CS17 is amended to read: “the site has been continuously marketed for employment uses at realistic prices for a period of at least <u>12 months</u> and there is no reasonable prospect of the site being re-used for employment uses;” to bring Policy CS17 in line with the requirements of other Councils.</p>
<p>Policy CS17 is overly restrictive, especially in terms of the requirement to have marketed an employment site for at least 2 years. Allowance should be made for the development of employment land for alternative uses where there is no reasonable prospect of a site being used for the allocated use over time to allow proposals to be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities, in accordance with paragraph 22 of the National Planning Policy Framework.</p>	<p>Although a 2 year marketing period is only a short-term protection, it is recommended that Point 2 of Policy CS17 is amended to read: “the site has been continuously marketed for employment uses at realistic prices for a period of at least <u>12 months</u> and there is no reasonable prospect of the site being re-used for employment uses;” to bring Policy CS17 in line with the requirements of other Councils. Policy CS17, as currently worded, provides sufficient flexibility to allow alternative uses to be considered in the event that it can be demonstrated that there is no realistic prospect of employment uses coming forward on any particular site.</p>
<p>Paragraph 22 of the National Planning Policy Framework should be included in full.</p>	<p>No change is recommended as it is not necessary to duplicate national policy and Policy CS17 provides sufficient flexibility to enable alternative uses to be considered in the event there is no realistic prospect of employment uses coming forward.</p>

Policy CS18 – Housing Requirements

Summary of Comments Received	Recommended Response
A target of 500 (net) completions per annum is undeliverable. The Annual Monitoring Report for 2012 shows just 26 extra new homes were completed in Wirral in 2011/12 and that “an annual average of 724 net additional dwellings would now be needed to reach the Regional Spatial Strategy target of 9,000 new homes by 2021”. The aspiration that this target will be met from the current land supply is pure fantasy.	No change is recommended, at this stage. The forthcoming Strategic Housing Market Assessment will determine the Council’s position in relation to future housing need including a new housing requirement figure for Wirral.
The target of 500 net dwellings per annum contrasts with Council's 2012 Annual Monitoring Report, which states that an annual average of 724 net additional dwellings would now be needed to reach the Regional Spatial Strategy target of 9,000 new homes by 2021. A target of 500 dwellings is therefore considered unsound and will fail to deliver the (robustly assessed) housing needs for the area.	No change is recommended, at this stage. The forthcoming Strategic Housing Market Assessment will determine the Council’s position in relation to future housing need including a new housing requirement figure for Wirral.
Paragraph 20.1 of Policy CS18 should be amended to read: “Policy CS18 sets out how many additional new homes the Council will seek to provide for in the period to 2028. <u>It is based on Government published household projections with an additional uplift to reflect the opportunity for major housing growth at Wirral Waters to deliver the regeneration of east Wirral and support the economic growth objectives of the Borough and wider City Region utilising a previously developed and sustainably located land resource at the heart of the Liverpool City Region.</u> ”	No change is recommended, at this stage. The forthcoming Strategic Housing Market Assessment will determine the Council’s position in relation to future housing need including a new housing requirement figure for Wirral.
New housing development especially on ‘green’ land cannot be sustainable when so many modern houses built in recent years remain unoccupied. A better assessment of need is required.	No change is recommended, at this stage. The forthcoming Strategic Housing Market Assessment will determine the Council’s position in relation to future housing need.
Policy CS18 fails to meet the full and objectively assessed needs of the Borough required by national policy. The Council’s existing Strategic Housing Market Assessment, which is now out of date, identifies a requirement for at least 570 dwellings per annum over the plan period. Spreading the supply required by the Regional Spatial Strategy over the entire Core Strategy plan period up to 2028 is not acceptable. The Council’s Strategic Housing Land Availability Assessment indicates a shortfall in provision over the plan period, even though it includes an over optimistic assessment of deliverability.	No change is recommended, at this stage. The forthcoming Strategic Housing Market Assessment will determine the Council’s position in relation to future housing need including a new housing requirement figure for Wirral.

Summary of Comments Received	Recommended Response
The 2011 Census shows that previous population forecasts have been significantly underestimating population growth. The Regional Spatial Strategy housing requirement figure should therefore be used as a minimum target until more detailed population figures become available.	No change is recommended, at this stage. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need including a new housing requirement figure for Wirral.
There has been significant under delivery since 2003/04 and a 20 per cent buffer should be applied to any calculation of housing land requirements in Wirral.	No change is recommended, at this stage, as the application of the 5 per cent or 20 per cent buffer required by national policy is subject to change over time and will be dependent on the Council's latest housing position. It is, however, accepted that the Council will need to ensure that a 20 per cent buffer can be provided, if required.
The projected levels of development are more than double average net housing completions since 2003 (207 per year), which included both boom and recession. The Regional Spatial Strategy targets are unsound for Wirral, as the major constraint is not land supply, but lack of money in the local economy. Applying these targets could lead to the premature release of Green Belt land. The target should be reduced to one that might be achievable in the likely economic circumstances. Wirral must be allowed to take windfalls into account as many Victorian properties in poor condition are not fit for purpose, and will make a significant contribution to the housing supply. Empty properties should also be included. The numbers should be no more than 300 net completions a year.	No change is recommended, at this stage. The forthcoming Strategic Housing Market Assessment (SHMA) will determine the Council's position in relation to future housing need including a new housing requirement figure for Wirral. The SHMA will consider the contribution of empty homes. The housing land supply set out in Table 20.2 of the Core Strategy already includes an allowance for windfalls, based on historic delivery.
Support an above-baseline forecast figure and a growth-orientated approach which recognises the significant potential for major residential growth and regeneration in east Wirral to drive forward the economic transformation of the Borough and the wider City Region but a stronger justification is needed for a figure based on Policy L4 of the Regional Spatial Strategy which will have been formally revoked by the time the Core Strategy is submitted to the Secretary of State.	No change is recommended, at this stage. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need including a new housing requirement figure for Wirral.
It is not realistic to expect this substantial target to be met wholly within the existing urban areas. The low level of housing growth proposed for Irby, Gayton and the rest of Settlement Area 7 – Heswall, will fall a long way short of meeting local needs. More development should, and will have to, take place in the west of the Borough to meet the identified need for new housing.	No change is recommended, at this stage. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need including a new housing requirement figure for Wirral.

Summary of Comments Received	Recommended Response
It is not realistic to expect this substantial target to be met wholly within the existing urban areas. The low level of housing growth proposed for Meols and the rest of Settlement Area 6 – Hoylake and West Kirby, will fall a long way short of meeting local needs. More development should, and will have to, take place in the west of the Borough to meet the identified need for new housing.	No change is recommended, at this stage. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need including a new housing requirement figure for Wirral.
The National Planning Policy Framework buffer is not an optional target that can be ignored and should be included in Policy CS18, rather than in the supporting text to Policy CS19 – Housing Implementation Plan.	No change is recommended, at this stage, as the application of the 5 per cent or 20 per cent buffer required by national policy is subject to change over time and will be dependent on the Council's latest housing position. It is, however, accepted that the Council will need to ensure that a 20 per cent buffer can be provided, if required.
The Regional Spatial Strategy requirement of 500 net dwellings per annum does not reflect other factors such as natural change or migration. It is clear that the housing requirement should be increased beyond the 500 dwellings currently proposed to around 600-750 dwellings per annum, as Policy CS18 is not based on up to date evidence and underestimates the actual need. A further comparable increase in population is expected over the next ten years.	No change is recommended, at this stage. The forthcoming Strategic Housing Market Assessment (SHMA) will determine the Council's position in relation to future housing need including a new housing requirement figure for Wirral. The SHMA will take account of the latest available population and household projections, based on the 2011 Census.
The Policy CS18 requirement is below the requirement identified in the Council's existing Strategic Housing Market Assessment and does not include the 20 per cent buffer required by national policy.	No change is recommended, at this stage. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need including a new housing requirement figure for Wirral. The application of the 5 per cent or 20 per cent buffer required by national policy is subject to change over time and will be dependent on the Council's latest housing position. It is, however, accepted that the Council will need to ensure that a 20 per cent buffer can be provided, if required.
The Council should be planning to meet the full need established by the Council's existing Strategic Housing Market Assessment (i.e. 41,760 dwellings), which is undeliverable without the release of strategic greenfield sites.	No change is recommended, at this stage. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need including a new housing requirement figure for Wirral.
Support the Council's decision not to rigidly distinguish between the numbers of new dwellings which should be delivered within each Settlement Area, to ensure flexibility and choice in delivery.	No change recommended

Summary of Comments Received	Recommended Response
It is not clear how the overall scale of proposed housing will be distributed across the different Settlement Areas.	No change recommended, as detailed development scenarios have already been provided to the respondent, to allow the consideration of appropriate infrastructure requirements and the respondent does not currently have any concern regarding the soundness of the Core Strategy.
Policy CS18 is based on the Regional Spatial Strategy annual requirement of 500 dwellings per year (2003-21) rolled forward to 2028. The minimum annual requirement identified in the Council's existing Strategic Housing Market Assessment (SHMA) is 570 dwellings per annum. The Council should take the actual housing need into account. The SHMA identifies an affordable housing need of 2,784 dwellings per annum. A housing requirement of 500 dwellings per annum is only 18% of the actual affordable housing need, without even addressing market demand. The Council's Strategic Housing Land Availability Assessment suggests that more than 500 dwellings per annum could be delivered.	No change is recommended, at this stage. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need including a new housing requirement figure for Wirral.
The imbalance between the need for smaller accommodation for older people as well as other smaller households who are not elderly or in need of support and the current emphasis on extending existing smaller properties and on building large new houses needs to be addressed.	No change is recommended, as the forthcoming Strategic Housing Market Assessment will determine the Council's position with regard to future housing needs and the need for different types and sizes of property.
Wirral has significantly under-delivered against housing targets over past years and yet many unoccupied properties and houses for sale remain. This must indicate that the "forecasts" are at best inflated and inaccurate and at worst will be damaging to the area. The methodology of the Council's existing Strategic Housing Market Assessment, which is based on aspirations, is fundamentally wrong. The reality of "housing need" is reflected in the state of the second hand market with a drop in value of some 15% in Wirral and a number of empty and un-used properties.	No change is recommended, at this stage. The forthcoming Strategic Housing Market Assessment will determine the position in relation to future housing need, market signals and the role empty homes can play in meeting local housing needs.
Concerned about the definition of developable sites and who decides.	No change is recommended, as the definition of a 'developable' site is set out in the National Planning Policy Framework, which says that developable sites "should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged." (NPPF, footnote 12 refers).

Summary of Comments Received	Recommended Response
The approach in Table 20.1 is inconsistent with the Council's Strategic Housing Land Availability Assessment 2012, which seeks to make the existing shortfall up in the first five years and indicates that an additional 767 dwellings are required in the five year period 2012-17 to account for projected demolitions between 2012 and 2017.	No change is recommended. The figure included in paragraph 20.9 of the Core Strategy has been calculated using the same methodology as that used in the Council's Strategic Housing Land Availability Assessment and does assume that the 'backlog' in housing delivery is met within the first five years and that an additional 767 dwellings will be required to account for projected demolitions. Figures for 2013 will be included in the revised Core Strategy.

Policy CS19 – Housing Implementation Plan

Summary of Comments Received	Recommended Response
Policy CS19 will not deliver the required development without a review of the Green Belt.	No change is recommended at this stage. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need.
The housing strategy must be realistic. The Council's Annual Monitoring Report for 2012 shows that an annual average of 724 net additional dwellings would now be needed to reach the Regional Spatial Strategy target of 9,000 new homes by 2021. It confirms that 80% of completions are now outside the regeneration priority area and that new affordable home completions fell by a third. There is little sign of significant improvement. These concerns are not simply short-term considerations and other sites are needed.	No change is recommended at this stage. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need. The order of search identified in Policy CS19 will not prevent sites coming forward elsewhere where suitable, developable sites cannot be identified within the regeneration priority areas. The forthcoming Core Strategy Viability Study will determine the Council's position on the scale and location of development.
The Council's Strategic Housing Land Availability Assessment 2012 indicates that based on an annual requirement of 500 dwellings per annum, the Council does not have a five year supply, despite the inclusion of 1,100 dwellings at Wirral Waters. Table 20.3 shows that just over half the units, with the exception of Wirral Waters, are currently subject to alternative uses or designations which could affect the timing, scale, pattern of future development, which may require further assessment before they could be released for new housing. The reliance on Wirral Waters, the failure to demonstrate a five year land supply and the constraints to delivery of identified sites in Table 20.3 means that Green Belt land is now a logical choice, especially if the housing requirement is increased to 570 dwellings per annum, in line with the Council's existing Strategic Housing Market Assessment.	No change is recommended at this stage. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need. The bringing forward of sites outside the existing order of search will currently be dealt with under Policy CS20 – Housing Contingencies.
The shortfall against the dwelling requirements in the Regional Spatial Strategy should be made up in the first five years in line with the Council's Strategic Housing Land Availability Assessment.	No change is recommended. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need. The Council's latest five-year housing land position is set out in Appendix 3 to the Annual Monitoring Report 2012. This calculation assumes that the backlog since 2003 is met within the five year period between 2012 and 2017.

Summary of Comments Received	Recommended Response
The strategy set out in Policy CS19 is too limited. It is not clear that the Council would be able to identify new housing sites, particularly if the limitations on existing employment sites remain, for example at Moreton, under Policy CS8 – Priorities for Leasowe, Moreton, Upton, Greasby and Woodchurch and Policy CS17 – Protection of Employment Land.	No change is recommended, as the order of search identified in Policy CS19 will not prevent sites from coming forward where suitable, developable sites cannot be identified from other categories.
The first tier in the order of search in Policy CS19 should be re-worded as follows: “areas of greatest need; previously developed sites <u>and undeveloped sites subject to an alternative non-residential allocation where it has been demonstrated that there are no reasonable prospects of coming forward for its allocated use,</u> ” as Policy CS19 currently prevents the delivery of residential development on sites which are currently undeveloped and allocated for alternative uses in the adopted Unitary Development Plan.	No change is recommended. The first tier in the order of search is currently “previously developed sites within areas of greatest need” and the last tier is currently “previously undeveloped sites within the urban area.” The proposed amendment would serve to undermine the priority that is currently given to the development of previously developed sites in line with paragraph 17 of the National Planning Policy Framework.
The fourth tier of sites in the order of search in Policy CS19 should be split and reworded to read: “previously undeveloped sites <u>within the areas of greatest need</u> “ and “previously undeveloped sites <u>within the urban area outside areas of greatest need,</u> subject to Policy CS30” to ensure that areas of greatest need are prioritised ahead of sites elsewhere within the wider urban area in line with the Council's regeneration aspirations.	No change recommended, as previously undeveloped sites in areas of greatest need are often more scarce than previously undeveloped sites in other parts of the urban area and the proposed amendment would place a greater emphasis on their loss.
The Council's latest Annual Monitoring Report 2012 shows that the Council cannot demonstrate an immediately deliverable 5-year supply of housing land. As this is insufficient to satisfy the requirements of national policy, it is inappropriate to seek to prioritise previously developed land, which will only restrict growth at a time when additional sites must come forward immediately to meet the identified backlog against the Regional Spatial Strategy in the first five years and an additional 20 per cent buffer.	No change is recommended, as the order of search identified in Policy CS19 will not prevent sites coming forward where suitable, developable sites cannot be identified from other categories and paragraph 17 of the National Planning Policy Framework still seeks to encourage the reuse of previously developed land.
The Council's Annual Monitoring Report demonstrated that the delivery of the housing targets will not be met and it is blatantly obvious that a Green Belt review is required as a matter of urgency.	No change is recommended. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need. The bringing forward of sites outside the existing order of search will currently be dealt with under Policy CS20 – Housing Contingencies.

Summary of Comments Received	Recommended Response
A sequential selection of sites is no longer found in national policy. Bearing in mind the Council's inability to demonstrate a five-year supply, the need for such a mechanism has not been justified as being reasonable or necessary.	No change is recommended, as the National Planning Policy Framework still seeks to encourage the effective use of land by reusing land that has been previously developed, provided that it is not of high environmental value (NPPF, paragraph 17) and still allows local plans to set out a clear strategy for allocating sufficient land which is suitable for development, providing it can be demonstrated that objectively assessed needs can be met with sufficient flexibility, taking account of the needs of residential and business communities.
If retained the order of search in Policy CS19 should include " <u>previously developed sites within the rural area</u> ", which is appropriate in the Green Belt in national policy, and lastly " <u>undeveloped sites in the rural area</u> ".	No change is recommended, as the development of previously developed sites in the Green Belt is already provided for under national policy and Policy CS3 – Green Belt, and the bringing forward of sites outside the existing order of search will currently be dealt with under Policy CS20 – Housing Contingencies.
The trajectory at Picture 20.1 is wholly unrealistic, especially bearing in mind recent performance with completions in 2011/12 at 22 dwellings. It is unrealistic to think that completions in 2012/13 will increase to nearly 1,200 dwellings without some significant policy intervention or other changes occurring.	No change is recommended, as Picture 20.1 identifies a total potential capacity of up to 1,200 units in 2012/13 but assumes that actual net completions will broadly match the average number of net completions between 2008 and 2012, equivalent to 147 net new dwellings. The forthcoming Core Strategy Viability Study will determine the Council's position in the likely scale of future development.
The Council is currently unable to identify a five year housing land supply in its most recent Strategic Housing Land Availability Assessment (SHLAA) and Annual Monitoring Report. The SHLAA also provides an over-optimistic assessment of deliverability particularly in the early part of the plan period, for example, by assuming that existing permissions will all come forward in the five year period, despite the fact that many of these sites are unviable or undeliverable in the current market.	No change is recommended. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need and the forthcoming Core Strategy Viability Study will determine the Council's position with regard to future viability.
It is not realistic to expect the Borough's challenging dwelling targets to be met wholly within the existing urban areas. The order of search outlined in Policy CS19 does not consider sites outside the existing urban area even though sites outside the existing urban area may represent the best opportunity to accommodate much needed new housing, including affordable units.	No change is recommended. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need. The bringing forward of sites outside the existing order of search will currently be dealt with under Policy CS20 – Housing Contingencies.
The housing supply position should be completely reviewed more regularly than every five years, particularly since the supply in Wirral could be affected significantly by the delivery or otherwise of Wirral Waters.	No change is recommended. Although the housing land supply will continue to be subject to ongoing annual monitoring, undertaking a complete review of the Council's housing land supply every year is considered too onerous in terms of resources available.

Summary of Comments Received	Recommended Response
<p>Table 20.2 – Housing Land Supply April 2012 is already out-of-date. The most recent Annual Monitoring Report shows that the Council is unable to demonstrate a deliverable five-year supply. The supply that does exist includes sites without any planning status. The realistic five-year supply is therefore likely to be significantly lower. Extreme caution should be applied when including sites without permission in the housing supply and more emphasis should be placed on the fact that this is only theoretical potential capacity. Recent appeal decisions confirm that 'pre-application' sites should not be included in the five-year land supply calculation.</p>	<p>No change is recommended. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need and the Core Strategy Viability Study will determine the Council's position with regard to future viability. Figures for 2013 will be included in the revised Core Strategy.</p>
<p>Policy CS19 should be amended to identify “sustainable greenfield sites” as a 5th priority for seeking to identify additional housing sites.</p>	<p>No change is recommended, as the last tier in the order of search is currently “previously undeveloped sites within the urban area” and the bringing forward of sites outside the existing order of search will currently be dealt with under Policy CS20 – Housing Contingencies.</p>
<p>The sequential approach in Policy CS19 fails to take into account the sustainability of rural settlements such as Thornton Hough, which already has a Post Office, public house/restaurant, church and primary school, or their future sustainability needs or recognise that greenfield sites might be more sustainable than brownfield sites, for example in terms of accessibility to local services. Restricting the Implementation Plan to previously developed sites/undeveloped sites in the urban area will not provide sufficient flexibility to ensure that housing targets will be met.</p>	<p>No change is recommended. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need. The development of previously developed sites in the Green Belt is already provided for under national policy and Policy CS3 – Green Belts, and Infill Villages are already identified in the existing Unitary Development Plan. The bringing forward of sites outside the existing order of search will currently be dealt with under Policy CS20 – Housing Contingencies.</p>
<p>National policy requires the Council to demonstrate a 5-year supply of housing land. Greenfield and Green Belt sites need to be considered and their broad location needs to be identified in the Core Strategy.</p>	<p>No change is recommended. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need. The broad location of new housing development is currently expected to be identified as part of a future site-specific Local Plan.</p>
<p>Point 4 of Policy CS19 should be amended to read: "subject to Policies CS30-39" to ensure that all environmental impacts are taken into account and to make the impact of Policy CS19 less "uncertain".</p>	<p>No change is recommended as Policy CS19 already states that planning permission will be granted subject to Policy CS21 – Criteria for New Housing Development, which includes all the safeguards requested applied under Policy CS42 – Development Management.</p>

Summary of Comments Received	Recommended Response
<p>The identified housing land supply includes land designated for employment purposes and land currently used for recreation which is unlikely to be developed and should be retained. The order of preference between spatial areas should therefore be removed, particularly to allow growth in Wirral's rural settlements.</p>	<p>No change is recommended. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing need. The order of search identified in Policy CS19 has been included to support the delivery of the Spatial Vision, Strategic Objectives and Broad Spatial Strategy, in line with paragraph 17 of the National Planning Policy Framework. The bringing forward of sites outside the existing order of search will currently be dealt with under Policy CS20 – Housing Contingencies. Policy CS17 – Protection for Employment Land, and Policy CS31 – Recreational Land and Buildings, allows for the detailed assessment of sites designated for employment and recreation.</p>
<p>A caveat needs to be applied to all brownfield sites to read: "<u>excluding the small proportion of brownfield sites which have developed environmental value, where that value cannot be retained in the development in accordance with policies CS30 and CS33.</u>"</p>	<p>No change is recommended, as Policy CS19 already states that planning permission will be granted for suitable sites subject to Policy CS21 – Criteria for New Housing Development, which includes the safeguards applied under Policy CS30 – Requirements for Green Infrastructure and Policy CS33 – Biodiversity and Geodiversity, applied under Policy CS42 – Development Management.</p>

Policy CS20 – Housing Contingencies

Summary of Comments Received	Recommended Response
<p>This is not an effective contingency plan. The Council does not have a 5-year supply and applying the Core Strategy policies in the current economic circumstances will continue this shortfall unless the Green Belt is reviewed now.</p>	<p>No change is recommended, at this stage. The forthcoming Strategic Housing Assessment will determine the Council's position in relation to future housing need and the forthcoming Core Strategy Viability Study will determine the Council's position on the scale and location of future development.</p>
<p>The Core Strategy should ensure that enough land is provided to meet the required need with sufficient flexibility to deal with changing circumstances and the potential for delays to Wirral Waters. Green Belt release should be dealt with up-front, rather than being left to monitoring and review, particularly as any Green Belt review would take time to undertake and implement before development could go ahead on Green Belt sites, to prevent additional pressure on neighbouring authorities to accommodate any unmet need.</p>	<p>No change is recommended at this stage. The forthcoming Strategic Housing Assessment will determine the Council's position in relation to future housing need.</p>
<p>Paragraph 20.23 casts doubt over the deliverability of Wirral Waters. Whilst the need for a contingency to safeguard against slower than expected delivery of housing is recognised, this uncertainty applies to all proposed housing sites. It is not appropriate to single out a specific development as being at greater risk of stalled delivery than others. The reasoned justification should therefore be amended to read: <u>"The rate of delivery of new housing development will be monitored throughout the Core Strategy plan period. If from this it is evident that the level and rate of housing growth from the identified supply of housing sites is less than anticipated contingency action plan will need to be implemented."</u></p>	<p>Accepted. It is therefore recommended that Policy CS20 is amended to delete the reference to Wirral Waters to read: "If new housing does not come forward <u>within</u> the first five years..." Paragraph 20.23 reflects specific comments submitted by third parties in response to the Strategic Housing Land Availability Assessment 2008 (Cabinet 21 July 2011, Minute 80 refers), Strategic Housing Land Availability Assessment 2011 (Cabinet 19 July 2012, Minute 61 refers) and the Preferred Options Report (Cabinet 21 July 2011, Minute 80 refers) about the ability to deliver sufficient levels of housing within the previous regeneration priority areas. It is therefore recommended that paragraph 20.23 is amended to delete the reference to Wirral Waters to read: "The principal areas of uncertainty identified through public consultation relate to the scale and timing of future development <u>and</u> the ability to continue to deliver housing within the previous regeneration priority areas associated with the Newheartlands Pathfinder..."</p>

Summary of Comments Received	Recommended Response
<p>Support the proposal to carry out a review of Green Belt only at the point defined in Policy CS20, to avoid the premature allocation of land within Green Belt and consequent impact on other more suitable sites but Green Belt 'functions' should be defined somewhere in Core Strategy in order to ensure clarity and manage expectations.</p>	<p>Accepted. It is recommended that paragraph 20.25 is amended to read: <u>“The purpose of the Green Belt in national policy is to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns merging into one another; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</u> The consideration of individual sites will, wherever possible, be undertaken as part of a wider sub-regional review of Green Belt boundaries, to provide a co-ordinated approach based on joint working across the sub-region and with adjoining authorities. Any future review of sites suitable for housing will also be combined with a review of requirements for employment, retail and open space.”</p>
<p>Agree that the Core Strategy should be flexible enough to provide for an ongoing five-year supply of deliverable housing sites throughout the period to 2028 in the event that Wirral Waters does not deliver as expected and that the only alternative source of land for development outside of the urban areas is in the Green Belt but the Core Strategy should look to review the Green Belt and allocate land as well as identifying safeguarded land, in the event that the level of future housing land supply identified does not deliver as expected. This matter cannot be left to the Site Allocations DPD.</p>	<p>No change is recommended, at this stage. The forthcoming Strategic Housing Assessment will determine the Council's position in relation to future housing need.</p>
<p>The Green Belt should be considered immediately and not after 2018. The concept of Green Belt as a 'last resort' is not realistic given the record of housing delivery. The Council's Strategic Housing Land Availability Assessment assumes that sites can be 'brought forward' from Category Three to fill the potential shortfall in housing land over the 5 and 10 year period from 2012. These sites are not currently developable. Category Three sites account for almost half of the total units required to 2028. The need for a buffer justifies looking immediately for alternative sites not just in existing urban areas but also within the Green Belt.</p>	<p>No change is recommended, at this stage. The forthcoming Strategic Housing Assessment will determine the Council's position in relation to future housing need.</p>

Summary of Comments Received	Recommended Response
A Green Belt review should be done now to proactively ensure an adequate supply of housing land over the short to medium term. It should not be done in a reactionary manner. The Council cannot demonstrate a 5 year supply of housing land; there has been a significant population growth above and beyond previously projected figures; there is no guarantee that housing will come forward at Wirral Waters in the short term; and there are insufficient sites within the urban area to provide an adequate supply of immediately deliverable housing land.	No change is recommended, at this stage. The forthcoming Strategic Housing Assessment will determine the Council's position in relation to future housing need. The forthcoming Core Strategy Viability Study will determine the Council's position on the scale and location of future development.
The Council is deluding itself that Wirral Waters will deliver. Policy CS20 is not an effective contingency plan. The Council needs to do more and actually undertake a Green Belt review as part of this Local Plan and not wait any longer, as failure to do so will make the Core Strategy unsound.	No change is recommended, at this stage. The forthcoming Strategic Housing Assessment will determine the Council's position in relation to future housing need. The forthcoming Core Strategy Viability Study will determine the Council's position on the scale and location of future development.
There is a need for an immediate Green Belt review. The tests required are unrealistic. If a single dwelling is built at Wirral Waters in the first five years the test cannot be met. If planning permission exists sufficient to demonstrate a five-year supply the test has similarly not been met.	The forthcoming Strategic Housing Assessment will determine the Council's position in relation to future housing need but it is recommended that Policy CS20 is amended to read: "If <u>alternative sites sufficient to provide an ongoing five-year supply to 2023</u> have no obtained planning permission <u>by 2018</u> , the Council will undertake a review..."
The review of the Green Belt provided for in Policy CS20 would be too late to respond to the existing and likely future significant shortfall in the plan period and will not meet the full and objectively assessed needs for housing over the plan period.	No change is recommended, at this stage. The forthcoming Strategic Housing Assessment will determine the Council's position in relation to future housing need.
The only mechanism to review Green Belt boundaries under Policy CS20 would effectively involve a complete review of the entire Local Plan, which would take a considerable period of time to deliver.	No change is recommended, at this stage. The forthcoming Strategic Housing Assessment will determine the Council's position in relation to future housing need.
If a site no longer performs a Green Belt function it should not have been placed in the Green Belt in the first place. This test could not therefore be met by any site currently in the Green Belt.	Accepted. It is recommended that the second bullet point under Policy CS20 is amended to read: "the site <u>is considered to be the most suitable, taking account of the five purposes of including land within the Green Belt in the National Planning Policy Framework</u> ".
Development in the Green Belt should only occur where good public transport and access by other sustainable modes exists, or can be readily and easily achieved.	No change recommended, as bullet point 4 in Policy CS20 already ensures that sites in the Green Belt are only considered for release if it can be demonstrated that the site "would be well-related to an existing Settlement Area in terms of setting, visual impact, infrastructure, access to services and a choice of means of transport."

Summary of Comments Received	Recommended Response
<p>The lead in time for any substantial progress on the residential element of Wirral Waters is likely to be longer than originally envisaged and there is little realistic prospect of an upsurge in development activity within the inner urban areas for the foreseeable future. Sites in these locations are affected by a range of constraints which are expensive to address and there is significantly less public sector funding available to help bring difficult sites forward. This will undoubtedly have a significant effect on Wirral's ability to meet its dwelling targets on brownfield land in the urban areas of east Wirral, and so there is a real possibility that this contingency policy will need to be invoked.</p>	<p>No change is recommended, at this stage. The forthcoming Strategic Housing Assessment will determine the Council's position in relation to future housing need and the forthcoming Core Strategy Viability Study will determine the Council's position on the scale and location of future development.</p>
<p>Wirral should consider whether there is the need to leave open the option of an earlier Green Belt review, either for Wirral alone or as part of a wider- sub-regional Green Belt Study.</p>	<p>No change is recommended, at this stage. The forthcoming Strategic Housing Assessment will determine the Council's position in relation to future housing need.</p>
<p>Policy CS20 is very negative and cautious and suggests that the Council is not confident that existing evidence is robust. Rather than provide a contingency policy, the Core Strategy should be informed by a more reliable and up-to-date evidence base and either confirm the requirement for a full Green Belt review or recognise the potential need for greenfield development outside the urban area.</p>	<p>No change is recommended, at this stage. The forthcoming Strategic Housing Assessment will determine the Council's position in relation to future housing need.</p>
<p>Policy CS20 merely delays the inevitable and fails to properly consider this alternative at the correct stage in the plan making process. The strategy proposed within Policy CS20 needs to be undertaken now and not in five years time to provide a clear picture of the potential impact of releasing Green Belt land for development. If this is not done prior to submission the Core Strategy cannot be shown to be "justified" (i.e. the most appropriate strategy when considered against the reasonable alternatives) or "effective" (i.e. deliverable).</p>	<p>No change is recommended, at this stage. The forthcoming Strategic Housing Assessment will determine the Council's position in relation to future housing need.</p>
<p>Policy CS20 may be unnecessary if projected housing numbers are reduced to a more sensible figure and it must not be allowed to over-rule policies to protect the environment. An additional bullet should be added to read: "the proposal is not in conflict with policies to protect the environment and biodiversity (CS30-39)".</p>	<p>No change is recommended, at this stage. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing needs. It is, however, recommended that an additional sentence is added to Policy CS20 to read: "<u>Development proposals will be expected to comply with the requirements of CS42.</u>"</p>
<p>The Green Belt is absolutely sacrosanct. Even land that may be considered "second quality" Green Belt should not be considered, as it acts a defensive barrier to the rest.</p>	<p>No change is recommended, at this stage. The forthcoming Strategic Housing Market Assessment will determine the Council's position in relation to future housing needs.</p>

Summary of Comments Received	Recommended Response
<p>Policy CS20 as currently drafted could be read as if it will only be enacted under two separate scenarios and infers that a handful of houses could be delivered at Wirral Waters and this would be enough to prevent a Green Belt review. Green Belt review will be undertaken under any scenario if there is less than 5 years housing supply in five years' time.</p>	<p>Accepted. It is recommended that Policy CS20 is amended to read: "If <u>a</u>lternative sites sufficient to provide an ongoing five-year supply <u>to</u> 2023 have no obtained planning permission <u>by</u> 2018, the Council will undertake a review of the Borough's ongoing housing land supply to seek additional developable sites within the existing urban area and then, if sufficient developable sites cannot be identified within the existing urban area, by considering the need to identify sites for housing development within the Green Belt sufficient to maintain an ongoing five year supply of deliverable housing land over the remainder of the plan period to 2028."</p>

Policy CS21 – Criteria for New Housing Development

Summary of Comments Received	Recommended Response
<p>Point 6 of Policy CS21 is not strong enough to ensure sustainable development in line with the National Planning Policy Framework. Cheshire West and Chester Council cites Code for Sustainable Homes and BREEAM targets. Wirral only uses these for water. These requirements should cover all environmental matters especially carbon emissions. The requirement for all new development to be "zero-carbon" from 2016 should be reflected in the Core Strategy and point 6 of Policy CS21 should read: "All new housing should meet Code for Sustainable Homes Level 4 from 2014 and CSH Level 6 from 2016. Other developments and conversions/refurbishments should meet BREEAM standards of Very Good or better," which are the levels set in the Wirral Waters planning conditions.</p>	<p>No change is recommended, at this stage. The Government advises that requirements for zero carbon under the Building Regulations should not be confused with the additional voluntary requirements under the Code for Sustainable Homes. The separate requirement for water conservation, in line with Code Level 3/4 at 105 litres per person per day, has been justified by specific research in the Wirral Water Cycle Study and by the findings of the Core Strategy Habitats Regulations Assessment with regard to the effect of water abstraction on the Dee Estuary Natura 2000 Site. As additional non-statutory requirements can often impose an additional cost on development, the Council's approach has been to negotiate but not require a higher voluntary standard of environmental performance where viable through solutions identified under Policy CS43 – Design, Heritage and Amenity, including the Code for Sustainable Homes, Lifetime Homes Standards, BREEAM and HCA Housing Quality Indicators. The impact of additional requirements on development viability will be tested in the forthcoming Core Strategy Viability Study and a further recommendation will be made once the study is complete.</p>
<p>Welcome the requirement for all new housing developments to demonstrate that water efficiency standards to Levels 3 and 4 of the Code for Sustainable Homes are achievable, which will help to reduce water consumption, energy bills and discharges to public sewers.</p>	<p>No change is recommended.</p>
<p>Policy CS21 and its Code targets are largely redundant given changes to the Building Regulations.</p>	<p>No change is recommended, at this stage. The Government advises that requirements for zero carbon under the Building Regulations should not be confused with the additional voluntary requirements under the Code for Sustainable Homes. Regulation 17K of Building Regulations 2013 currently requires potential consumption to be no greater than 125 litres per person per day.</p>
<p>It will be possible for residential schemes in the Green Belt at Heswall and Meols to demonstrate compliance with the provisions of Policy CS21.</p>	<p>No change is recommended but the indication that these criteria are deliverable is welcomed.</p>
<p>There is no need for point 6 of Policy CS21 now that Code for Sustainable Homes standards are being enforced through Building Regulations.</p>	<p>No change is recommended, at this stage. The Government advises that requirements for zero carbon under the Building Regulations should not be confused with the additional voluntary requirements under the Code for Sustainable Homes.</p>

Policy CS22 – Affordable Housing Requirements

Summary of Comments Received	Recommended Response
Support the statement that new-build houses, provided via section 106 legal agreements should be in accordance with current HCA design and quality standards and Housing Quality Indicators.	No change is recommended.
The reference to a 40% target is not substantiated by the evidence base. It is excessive, disproportionate, unviable, unrealistic and undeliverable.	No change is recommended, at this stage, because the 40% target arises from the Council's existing Strategic Housing Market Assessment, prepared in accordance with national guidance. The need for affordable housing will be updated as part of the forthcoming Strategic Housing Market Assessment which will determine the Council's position in relation to future housing needs.
Policy CS22 fails to make provision for rural exception schemes, which would be appropriate development in the Green Belt under Policy CS3, to ensure that identified needs could be met in the rural area in appropriate circumstances.	No change is recommended, as the proposed requirement for affordable housing will apply throughout the Borough, wherever an acceptable development is proposed.
The provision of "affordable housing" has been undermined by Central Government dropping the need for "affordable housing" in new builds.	No change is recommended, as national policy still expects local plans to meet the objectively assessed need for affordable housing.
The reference to a maximum target of 40% should be deleted from Policy CS22.	No change is recommended, at this stage, because the 40% target arises from the Council's existing Strategic Housing Market Assessment, prepared in accordance with national guidance. The need for affordable housing will be updated as part of the forthcoming Strategic Housing Market Assessment which will determine the Council's position in relation to future housing needs.

Policy CS23 – Criteria for Specialist Housing

Summary of Comments Received	Recommended Response
Policy CS23 should refer to adequate provision for “community housing arrangements to accommodate leavers of institutional care and the elderly”	Accepted. It is recommended that an additional criterion be added to read: “Proposals for the development of specialist housing will be permitted where it can be demonstrated that the proposal would; ... <u>meet an identified need for community housing arrangements, leavers of institutional care and the elderly:</u> ”

Policy CS25 – Hierarchy of Retail Centres

Summary of Comments Received	Recommended Response
Liscard should not be identified as a 'Town Centre' as it is a densely populated residential area. Residents' quality of life, the value of their homes and their marketability should be protected in and around Liscard.	The hierarchy of retail centres is based on the findings of the Strategy for Town Centres, Retail and Commercial Leisure in Wirral (Roger Tym & Partners, December 2009), which showed that Liscard is second only to Birkenhead (including Grange Road West and Oxton Road) in size and is significantly larger than the next largest centre (Heswall); is second only to Birkenhead in terms of comparison turnover and market share; and has one of the highest proportions of convenience turnover and market share in the Borough. On this basis, Liscard was placed in the second of the four categories of centre identified, which is consistent with national policy. Subsequent studies, including the Wirral Town, District and Local Centres Study and Delivery Framework (June 2011) and the GVA Retail Study Update (March 2012), have continued to support this analysis and do not suggest that Liscard's status as a 'town centre' is in any way inappropriate. A detailed town centre Action Plan for Liscard is in preparation in consultation with the local community and will be reported to the Council's Cabinet in June 2013.
Residents quality of life, the market value of their homes and their marketability should be protected in and around Liscard.	No change is recommended, as Policy CS43 – Design, Heritage and Amenity, includes general measures to protect residential amenity and Policy CS27 – Food and Drink Uses in Existing Centres and Parades, includes measures to control the impact of food and drink uses and the night-time economy.
Support the proposed hierarchy of retail centres but the inclusion of acceptable unit sizes is now contrary to national policy. Scale is no longer an appropriate test and suitability should only be considered through retail impact assessments under Policy CS28. Policy CS25 should solely focus on setting out the retail hierarchy.	No change is recommended. Paragraph 161 of the National Planning Policy Framework indicates that Councils should consider the role and function of town centres and the relationship between them and their capacity to accommodate new town centre development. The figures indicated in Policy CS25 are guidelines rather than thresholds, intended to ensure that an appropriate balance is maintained across the local hierarchy of centres and Policy CS26 – Criteria for Development Within Existing Centres, indicates that proposals above the guidelines will be permitted where the benefits of the proposal outweigh the disadvantages having regard to the considerations listed.

Summary of Comments Received	Recommended Response
<p>The recently completed New Brighton Waterfront scheme should be designated as part of a New Brighton Town Centre to include Victoria Road Traditional Suburban Centre, the Floral Pavilion Theatre and the residential /commercial premises and public spaces in the immediate vicinity. The inclusion of Victoria Road alone as a Local Centre will not support the future strategic resurgence of New Brighton, nor protect the mixed use regeneration development that has been delivered at New Brighton Waterfront. The suggested Town Centre would include a mix of traditional and modern retail outlets of various sizes, including 2 supermarkets, a theatre, hotels, B&Bs, a casino, food and drink uses, Class A2 retail uses, a Post Office, a cinema, a mix of leisure uses, a lifeboat station and an indoor children's play facility. A new designation would raise the status of the area and help to focus the commercial market on the new Town Centre.</p>	<p>No change is recommended, as the Marine Point development is an out-of-centre retail and leisure development. Paragraph 21.12 of the Core Strategy clearly indicates that existing out-of-centre retail parks are not regarded as “centres” for the purposes of Policy CS25 and that new development in these locations will only be permitted subject to Policy CS29 – Criteria for Edge-of-Centre and Out-of-Centre Facilities, including the sequential approach and an assessment of impact on existing centres. The existing Unitary Development Plan identifies the New Brighton waterfront as a Tourist Development Site and this approach is expected to be carried forward into a site-specific Local Plan. The degree of separation of the Marine Point development from the New Brighton (Victoria Road) Local Centre and the sizeable intervening residential area, where the introduction of town centre uses would not be appropriate, make it inappropriate to include the Marine Point development within an expanded local centre boundary alongside the Local Centre at Victoria Road.</p>
<p>Policy CS25 should be amended to refer to the intention to designate a new town centre at East Float to read <u>“It is anticipated that a new Town Centre will be designated at East Float through a future review of the Core Strategy reflecting the level of retail and associated development which is expected to be delivered and the role this will play in serving the resident, working and visitor population at East Float.”</u></p>	<p>No change is recommended. It would be premature to anticipate or commit to the designation of a new town centre at Wirral Waters, as it is not yet clear how or when the proposed town centre uses at East Float will be developed until reserved matters applications have been submitted and implemented.</p>

Policy CS26 – Criteria for Development within Existing Centres

Summary of Comments Received	Recommended Response
The history of sale or re-letting of neighbouring premises and the presence of other empty premises should be taken into account when considering alternative uses outside the centres listed in Policy CS25.	No change is recommended, as Policy CS26 already allows the “reasonable prospect of re-use for compatible purposes” to be considered.
The Core Strategy should support the implementation of the wide range of potential actions that may be included in the emerging Town Centre Action Plans. The removal of street clutter, blank shop windows, advertising, and minimising of traffic signs should also be facilitated.	No change is recommended to Policy CS26, as this wider series of actions, which will often need to be taken outside the planning system, are more appropriate to be included in a Town Centre Action Plan. It is therefore recommended that paragraph 21.3 of the Core Strategy is amended to read: “Further proposals for more local improvements are identified in the Town, District and Local Centres Study and Delivery Framework <u>and will be included in a series of more detailed Town Centre Action Plans</u> ”.
All issues relating to retail impact should be dealt with under one Policy CS28 to avoid duplication and confusion. These elements should be detailed from Policy CS26.	No change is recommended as it is appropriate to explain how proposals that may exceed the floorspace guidelines in Policy CS25 will be evaluated.

Policy CS28 – Retail Impact Assessments

Summary of Comments Received	Recommended Response
Welcome the requirement for retail impact assessments for edge-of-centre developments and out-of-centre developments above the specified thresholds which will also protect existing centres outside the Borough.	No change is recommended
The thresholds for requiring retail assessments for out of centre developments are overly restrictive and not based on a robust and up to date evidence base, The default position of 2,500 sq m set out in paragraph 26 of the National Planning Policy Framework should be adopted.	No change is recommended, at this stage. The National Planning Policy Framework says that "local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500 sq m)" The Council is therefore permitted to establish a locally set threshold. The Council's Retail Update 2012 confirms no capacity for additional convenience or comparison floorspace during the plan period. New retail development under the national default threshold could therefore have a significant impact on designated centres. It is therefore recommended that further work is undertaken to support an appropriate local threshold for inclusion in the Core Strategy.

Policy CS29 – Criteria for Edge-Of-Centre and Out-Of-Centre Facilities

Summary of Comments Received	Recommended Response
Point 3 of Policy CS29 is unnecessary and excessively onerous. The requirement to 'enhance and complement the range and quality of facilities provided in existing centres' does not reflect national policy and should be removed.	No change is recommended because point 3 of Policy CS29 is intended to allow the potential benefits of an edge-of-centre or out-of-centre proposal to be identified and taken into account.
The requirement to meet Policy CS42 – Development Management should be deleted as it replicates other Core Strategy policies. Tying Policy CS29 to Policy CS42 also reduces the flexibility to meet potential future change, given the limitations of Policy CS2 – Broad Spatial Strategy and Policy CS8 – Priorities for Leasowe, Moreton, Upton, Greasby and Woodchurch, on the reuse of employment sites in Moreton.	No change is recommended, as Policy CS42 – Development Management has been included to ensure that relevant Core Strategy policies are applied to every new development that requires planning permission, including edge-of-centre and out-of-centre retail proposals, and to prevent the proliferation of additional criteria throughout the other policies of the Core Strategy.
Point 1 of Policy CS29 should be re-worded as follows: “No alternative, suitable sites are available, first within, and then <u>appropriate edge-of-centre sites which are well connected to a centre listed in Policy CS25. If no suitable, available in or edge-of-centre sites are available then accessible out-of-centre sites will be considered.</u> ” to better reflect the National Planning Policy Framework.	Accepted, but it is recommended that point 2 of Policy CS29 is amended to read: “the site is easily accessible by a choice of means of transport and <u>preference has been given to sites which are, or will be,</u> well-connected to a town, district or local centre;”
Point 3 of Policy CS29 should be deleted on the basis that there is no requirement in national policy to undertake a qualitative based assessment; the requirement is subjective, with no fixed parameters for assessment; and the requirement is anti-competitive, if this would prevent a new store of a comparable scale and quality from being introduced, given the need to enhance competition and choice.	No change is recommended because point 3 of Policy CS29 is intended to allow the potential benefits of an edge-of-centre or out-of-centre proposal to be identified and taken into account.
Welcome the requirement that edge-of-centre and out-of-centre facilities should have no significant adverse effect on the vitality and viability of a centre within an adjacent authority.	No change is recommended.
The addition of further retail 'tests', above and beyond national policy, is excessively onerous and unnecessary. Paragraph 24 of the National Planning Policy Framework states that "When considering edge-of-centre and out-of-centre proposals, preference should be given to accessible sites that are well connected to the town centre." The wording of point 2 of Policy CS29 should therefore read: "The site is easily accessible by a choice of means of transport and <u>preference is given to sites that are well-connected to a town, district or local centre</u> " to ensure that the sequential test can be carried out properly.	Accepted. It is recommended that point 2 of Policy CS29 is amended to read: “the site is easily accessible by a choice of means of transport and <u>preference has been given to sites which are, or will be,</u> well-connected to a town, district or local centre; and”

Summary of Comments Received	Recommended Response
Point 6 of Policy CS29 which simply cross refers to Policy CS42 should be deleted to remove unnecessary repetition from the Core Strategy.	No change is proposed because Policy CS42 – Development Management has been included to ensure that relevant Core Strategy policies are applied to every new development that requires planning permission, including edge-of-centre and out-of-centre retail proposals, and to prevent the proliferation of additional criteria throughout the other policies of the Core Strategy.
Paragraph 21.30 is unacceptable, as it implies that Wirral Waters is a suitable location for retail. The Core Strategy must clearly state that retailing outside allocated centres, across the City Region, is not acceptable.	Accepted. It is recommended that paragraph 21.30 is amended to delete the reference to Wirral Waters to read: “The Council’s preference is for new floorspace to first be directed to existing centres in line with the hierarchy identified under Policy CS25 and then, if a need is identified, to <u>have</u> regard to the need for regeneration, considerations of scale and impact on existing centres and support for the objectives of the Birkenhead Integrated Regeneration Study.”
Policy CS29 should be reworded to read: “...will be permitted where it can be demonstrated that <u>they accord with the policies contained within the National Planning Policy Framework, and:</u> ”	No change is recommended, as national planning policy is already a material consideration in planning decisions.
Policy CS29 should be reworded to ensure that the restrictive conditions referred to are not added as standard practice to all permissions for retail developments. Circular 11/95 makes it clear that conditions should only be applied to permissions where they are justified and necessary to make the development acceptable in planning terms.	Accepted. It is recommended that the final paragraph of Policy CS29 is amended to read: “ <u>Where appropriate, planning conditions will be used to control the type, mix and quantum of gross and net retail floorspace; the range of goods sold; size of units; and number of operators per unit; to ensure that the impact on existing centres is minimised.</u> ”

Policy CS30 – Requirements for Green Infrastructure

Summary of Comments Received	Recommended Response
Either point 1 of Policy CS30 should be altered to "maintain and enhance <u>existing biodiversity and geodiversity assets</u> , landscape features etc" to refer to biodiversity or point 4 of Policy CS30 should be altered to say: " <u>protect</u> and enhance any biodiversity and geodiversity assets and their settings; contribute towards net gains for biodiversity...in line with Policy CS33", to protect the assets themselves rather than just their setting.	No change is recommended as point 1 of Policy CS30 is intended to refer to landscape and amenity and the existing references in point 4 of Policy CS30, to contributing "towards net gains for nature" and preserving and enhancing the setting of biodiversity and geodiversity assets, will already include their protection under Policy CS33 – Biodiversity and Geodiversity.
Policy CS30 needs to say that " <u>Action will be taken to assess cumulative impacts of piecemeal development on biodiversity assets and wildlife corridors, and protection, mitigation or compensation required, as appropriate</u> ", to prevent small developments adding up to block a wildlife corridor or isolate a biodiversity asset.	No change is recommended as point 4 of Policy CS30 already provides for the enhancement of ecological networks and Policy CS33 – Biodiversity and Geodiversity provides for the protection of biodiversity and geodiversity assets and coherent ecological networks.
Paragraph 22.3 should read "wildlife <u>and</u> ecosystem services" not "or", as green infrastructure is expected to be multi-functional.	Accepted. It is recommended that paragraph 22.3 is amended to read "...securing a resilient, coherent network of interconnected landscapes, wildlife <u>and</u> ecosystem services..."
Policy CS30 needs to refer to the " <u>protection and creation of corridors...</u> " as it is difficult to protect corridors such as linked areas of large gardens protected, for example, for butterflies.	No change is recommended, as point 2 of Policy CS30 already refers to the protection of green networks and point 4 of Policy CS30 to the enhancement of ecological networks. More detailed proposals are more appropriate to be included in a site-specific Local Plan.
A detailed study of green infrastructure is required to consider the need to include or exclude other open spaces besides those already designated in the Unitary Development Plan, which should be consulted on to allow land owners to comment on proposals which may affect their land.	No change is recommended, as paragraph 22.4 already refers to the intention to prepare a Green Infrastructure Strategy and any site-specific proposals must in any case be subject to statutory consultation.
The word 'unavoidable' in the last bullet point in paragraph 22.6 is unnecessary.	No change is recommended, as some losses to green infrastructure will be unavoidable if new development needs to be accommodated to meet the requirements of national policy.
Paragraph 22.6 should also refer to " <u>Identify possible Biodiversity Offsetting areas for as many habitats as possible.</u> "	No change is recommended, as the first bullet point in paragraph 22.6 already refers to identifying the role and function of existing green infrastructure and any gaps or opportunities for enhancement.
Paragraph 22.8 should say: " <u>Biodiversity off-setting, the Community Infrastructure Levy or other similar mechanisms may be used to enable developers to contribute towards Green Infrastructure</u> ".	No change is recommended, as paragraph 22.8 already refers to the policies for development management set out in Section 26 of the Core Strategy, which includes Policy CS45 – Developer Contributions.

Summary of Comments Received	Recommended Response
Paragraph 22.6 should also refer to " <u>map strategic wildlife corridors and stepping stones which will help wildlife to move in response to climate change</u> "	No change is recommended, as the first bullet point in paragraph 22.6 already refers to mapping the role and function of existing green infrastructure and any gaps or opportunities for enhancement and the fifth bullet point to the role of green infrastructure in relation to mitigation and adaption to climate change.
Paragraph 22.8 should record that Policy CS30 can also be delivered through Policy CS12 - Wirral Waters, Policy CS21 – Criteria for New Housing Development and Policy CS43 - Design, Heritage and Amenity.	No change is recommended, as paragraph 22.8 already refers to the policies for development management set out in Section 26 of the Core Strategy, which includes Policy CS43 – Design, Heritage and Amenity and which Policy CS12 and Policy CS21 will also apply.
Improving water quality is a key objective of the EU Water Framework Directive. Watercourse hydromorphology enhancement requiring the removal of redundant features and watercourse restoration should be specifically required in line with the North West River Basin Management Plan.	Accepted. It is recommended that Point 6 of Policy CS30 is amended to read: "...in line with Policy CS34 and CS35, including improvements to water quality and watercourse <u>hydromorphology, including the removal of redundant features and watercourse restoration</u> , where relevant."
Viability needs to be taken into account.	No change is recommended, as the need for "reasonable provision" will be dealt with under Policy CS45 – Developer Contributions and the viability of Core Strategy requirements is currently being assessed as part of the forthcoming Core Strategy Viability Study.
The Liverpool City Region Ecological Framework needs further work before it can be used as it does not, at present, show corridors and stepping stones effectively but merely enlarged buffer zones round existing sites.	No change is recommended, as it is still relevant to refer to the Ecological Framework and work to further refine the Ecological Framework is ongoing. The forthcoming Green Infrastructure Strategy referred to under paragraphs 22.4 to 22.6 should also satisfy some of these concerns.
The Wirral Biodiversity Audit defines some obvious corridors such as railway lines but does not look in detail at other features such as lines of large gardens within the urban area or corridors of substantial hedges in the rural area to examine whether they do or could act as wildlife corridors.	No change is recommended, as it is still relevant to refer to the Biodiversity Audit. The forthcoming Green Infrastructure Strategy referred to under paragraphs 22.4 to 22.6 should satisfy some of these concerns.

Policy CS31 – Recreational Land and Buildings

Summary of Comments Received	Recommended Response
It is unclear whether all criteria or some of the criteria need to be met. The wording at the end of points 1-3 should be changed to "or" and not "and", especially as point 4 indicates that point 3 should also be addressed.	No change is recommended, as the existing wording clearly indicates that development will only be permitted where either <i>all</i> of the first three criteria are met (the site is genuinely surplus <i>and</i> has been marketed <i>and</i> does not need to be retained for another value) <i>or</i> the facility will be replaced with an equivalent or better facility (point 4).
Point 3 of Policy CS31 is a "catch-all" fallback position that could be used to "fudge" and "block" development from taking place, ignores the benefits of any qualitative re-provision and should be deleted. Re-provision should be like for like quantitatively.	No change recommended, as sites which may not be needed in numerical terms may often need to be maintained for some other intrinsic value. It is unlikely that value for landscape, heritage, biodiversity, drainage or flood defenses could easily be replaced. The benefits of re-provision are assessed under point 4 of Policy CS31.
Point 4 of Policy CS31 assumes that a need exists, assumes that re-provision should be like for like quantitatively and ignores the benefits of any re-provision.	No change recommended. Policy CS31 assumes a need unless the site is genuinely surplus (point 1) and there is no reasonable prospect of recreational reuse (point 2). Point 4 of Policy CS31 reflects the National Planning Policy Framework, which states that open space, sports and recreation buildings and land should not be built upon unless the loss would be replaced by equivalent or better provision (NPPF paragraph 74 refers).
Point 3 of Policy CS31 should be altered to read: "biodiversity, <u>wildlife corridors</u> , drainage....." as it would be easy for open space to be allowed, to be developed without that function being taken into consideration.	No change is recommended, as point 3 of Policy CS31 already refers to biodiversity.
Point 2 of Policy CS31 should be deleted, as the suggestion that an existing site should be marketed for 2 years for recreational uses is ridiculous. It assumes that there is a need, that it would be pragmatic to continue such uses in almost perpetuity in spite of any more urgent needs to enable other benefits from accruing.	No change recommended in respect to the principal part of this representation, as it is reasonable to request evidence to demonstrate that a site is genuinely surplus and that there is no real prospect of re-use for recreation before permitting what will often be irreversible development. It is however recommended that point 2 of Policy CS31 is amended to read: "The site has been continuously marketed for recreational uses at realistic prices for a period of at least <u>12 months</u> and there is no reasonable prospect of the site being re-used for recreational use;" in line with a corresponding recommendation to modify Policy CS17 – Protection of Employment Land.

Summary of Comments Received	Recommended Response
A marketing period is unnecessary as in most cases the Council will be the owner. The period of two years appears is overly restrictive.	No change recommended in response to the principal part of the representation, as a significant proportion of open space, sport and recreation buildings and land in Wirral are privately owned and it is not unreasonable to require evidence that a site is genuinely surplus through marketing evidence. It is however recommended that point 2 of Policy CS31 is amended to read: "The site has been continuously marketed for recreational uses at realistic prices for a period of at least <u>12 months</u> and there is no reasonable prospect of the site being re-used for recreational use;"
There is no justification for proposing to apply a two year marketing exercise in either national policy or the local evidence base. The two year threshold does not demonstrate any flexibility to respond to changing circumstances. If it has been demonstrated to the satisfaction of the Council and relevant statutory bodies (Sport England) that proposals meet the first policy test and demonstrate that a particular site is genuinely surplus then the requirement to market the site for two years is unduly onerous and requires an applicant to demonstrate something that has already been accepted.	No change is recommended in response to the principal part of the representation, as it is not unreasonable to require evidence that a site is genuinely surplus not only in theory but in practice through marketing. It is however recommended that Point 2 of Policy CS31 is amended to read: "The site has been continuously marketed for recreational uses at realistic prices for a period of at least <u>12 months</u> and there is no reasonable prospect of the site being re-used for recreational use;"
There is no distinction in Policy CS32 between public and private recreational facilities and land. If recreational use on a private facility has ceased or is genuinely surplus then there should be no requirement to market the site for two years when effectively there is no loss of public recreational land or facility.	No change is recommended, as Policy CS31 is intended to protect both public and private sites which contribute towards meeting the need and demand for open space, sport and recreation arising from within the local community as a whole and there is no distinction between public and private sites in the National Planning Policy Framework.
A precautionary approach that seeks to protect existing provision broadly mirrors Sport England's playing field policy, and paragraph 74 of the National Planning Policy Framework. The commitment in paragraph 22.10 to undertake an up to date Playing Pitch Strategy and Built Facilities Strategy means that a challenge to the soundness of the Core Strategy would be unduly hard-line but both studies must be complete before a site-specific Local Plan is prepared.	Accepted. It is recommended that paragraph 22.10 is amended to read: "Policy CS31 continues to apply the standards set out in the existing Unitary Development Plan for Wirral, which were adopted in February 2000, pending further research on local standards to be undertaken as part of an ongoing review of the Council's Parks and Countryside service. <u>A formal update of the Council's Playing Pitch Strategy and a revised Built Facilities Strategy will be completed before a site-specific Local Plan is prepared.</u> "

Summary of Comments Received	Recommended Response
<p>Policy CS31 should be altered to say "<u>Opportunities will be sought to meet Natural England targets of 1) an accessible natural greenspace within 300m (in a straight line) from every home 2) Statutory Local Nature Reserves at a level of 1ha per 1000 people</u>" as development should wherever possible provide for the creation of new good quality open space, including naturalistic habitats, especially in the most densely built areas where they are most often needed.</p>	<p>No change is recommended. The 300m standard is an unrealistic target in Wirral due to the density of the urban area and the pattern and demand for different uses of open space within the area. Although the shortfall of designated statutory Local Nature Reserves against the national target is accepted, it is not considered appropriate to make this a requirement of planning policies for determining individual planning applications. Existing biodiversity assets are also subject to additional protection under Policy CS33 – Biodiversity and Geodiversity.</p>

Policy CS33 – Biodiversity and Geodiversity

Summary of Comments Received	Recommended Response
The first bullet point in Policy CS33 should be altered to read; " <u>competently</u> evaluate the value and extent of the assets..."	Accepted. It is recommended that the first bullet point in Policy CS33 is amended to read: " <u>competently</u> evaluate the value and extent of the assets on or within the vicinity of the development site including their position in the hierarchy of international, national and local sites;"
The third bullet point in Policy CS33 should be altered to read; "evaluate the options and opportunities available to <u>protect and</u> enhance the value of the assets and contribute towards wider ecological networks.	No change is recommended, as the wording has been drawn up in consultation with Natural England and 'enhance' was considered to both include and go further than 'protect'.
The fourth paragraph in Policy CS33 should to make it plain that there is a necessary hierarchy of 1) protect and enhance assets within the development 2) provide adequate on-site mitigation 3) provide adequate off-site mitigation, within Wirral and preferably in the same or adjacent Settlement Areas. Mitigation must also provide equivalent habitat with equivalent ecological and social functions.	While a sequence of 'avoid, mitigate and compensate' is accepted, national policy and guidance does not prefer on-site mitigation ahead of off-site mitigation. It is, therefore, recommended that Point 2 of Policy CS33 is amended to read: " <u>where criterion 1 cannot be satisfied</u> , adequate on-site or off-site mitigation can be provided that will secure a net gain to biodiversity or geodiversity;" It is also recommended that a definition of mitigation is added to the Glossary.
Paragraph 22.16 should be altered to remove "major" as this is not a concept used in ecology and would lead to arguments over interpretation.	Accepted but the wording reflects Article 10 of the EC Habitats Directive which states that "Member states shall endeavour, where they consider it necessary, in their land-use planning and development policies and, in particular, with a view to improving the ecological coherence of the Natura 2000 network, to encourage the management of features of the landscape which are of major importance for wild fauna and flora". It is, therefore recommended that paragraph 22.16 is amended to read: "The Council has a <u>general</u> duty to have regard to the purpose of conserving biodiversity and <u>a more specific duty</u> to encourage the management of features of the landscape which are of major importance for wild flora and fauna."
Paragraph 22.18 should be altered to add: " <u>Please note that site designations and boundaries are likely to change as the new criteria are implemented and ecological survey work continues. The Council should be contacted for current data.</u> "	Accepted but it is recommended to amend the final sentence in paragraph 22.18 with simplified wording to read: "The Local Wildlife Partnership is currently reviewing the selection criteria for wildlife sites, in accordance with national guidance, prior to the Council agreeing a revised list of Local Wildlife Sites for inclusion in a site specific Local Plan, <u>which will be kept under regular review</u> ".
Paragraph 22.19 should be altered to replace "recognised techniques" with " <u>current best practice</u> ".	Accepted. It is recommended that paragraph 22.19 is amended to read: "Ecological assessments required under Policy CS33 must be undertaken by suitably qualified people, <u>using current best practice,...</u> "

Summary of Comments Received	Recommended Response
Paragraph 22.20 should be re-ordered and altered to read: " <u>If it is not possible to locate a proposal on a site with less harmful impacts, nor retain and enhance the existing biodiversity within the development, then, following consultation with appropriate ecological professionals, mitigation must be agreed before planning permission will be granted. Mitigation will be secured through planning conditions and where necessary legal agreements. On-site mitigation will usually be preferable to off-site mitigation.</u> "	No change is recommended. The wording of paragraph 22.20, agreed with Natural England, already expresses the hierarchy of avoid, mitigate and as a last resort compensate, as set out in national policy (National Planning Policy Framework, paragraph 118 refers).
The LCR Ecological Framework, mentioned in paragraph 22.21, must be improved when preparing the Wirral Green Infrastructure Strategy.	No change is recommended, as paragraph 22.21 already states that "the Green Infrastructure Strategy will further develop priorities for establishing more effective networks".
Paragraph 22.22 should refer to paragraph 23.20 on invasive species and paragraph 22.22 (or paragraph 23.20) should be altered to read " <u>Plans to deal with invasive species will be required as part of planning applications, where such species are present.</u> "	Accepted. It is recommended that paragraph 22.22 is amended to read: "Natural England's website provides guidance on protected species and priority habitats and priority species. The impact of invasive species is considered in Policy CS37 below. <u>Plans to deal with invasive species will be required as part of planning applications, where such species are present.</u> "
The first paragraph of Policy CS33 should be altered to remove "seek to".	No change is recommended, as removing "seek to" would go beyond national policy, which states that planning policies should minimise impacts on biodiversity and geodiversity (National Planning Policy Framework, paragraph 117 refers).
The mention of "natural environmental assets" confuses the terminology throughout the Core Strategy, which should clarify that nature=wildlife=biodiversity and geodiversity=earth science. The wording should be standardised and/or explained within the Glossary.	Accepted. It is recommended that revised definitions for natural environmental assets, biodiversity assets and geodiversity assets are included in the Glossary.
The first paragraph of Policy CS33 should be altered to read: "The Council will seek to protect and enhance the natural environmental assets of the Borough, including designated biodiversity and geodiversity <u>assets</u> ," rather than "sites" and to " <u>retain and wherever possible enhance coherent ecological networks.</u> " rather than merely "establish" them.	Accepted but it is recommended that the first paragraph of Policy CS33 is amended with slightly modified wording to read: "The Council will seek to protect and enhance the natural environmental assets of the Borough, including designated biodiversity and geodiversity <u>assets</u> ; priority habitats and species; ancient woodland; and aged or veteran trees found outside ancient woodland; and wherever possible provide net gains in biodiversity and <u>retain and enhance coherent ecological networks.</u> "

Summary of Comments Received	Recommended Response
Support the inclusion of Policy CS33 but the wording should be stronger to ensure a beneficial outcome in line with national planning policy. The first paragraph of Policy CS33 should be altered to say that the Council 'will' protect and enhance the natural environmental assets of the Borough.	No change is recommended, as removing "seek to" would go beyond national policy, which states that planning policies should minimise impacts on biodiversity and geodiversity (National Planning Policy Framework, paragraph 117 refers).
It should be clarified that the off-site mitigation of environmental impact is a last resort. Certain types of designated sites, such as grassland sites, cannot be recreated with any certainty of success until 20 years of establishment and management have elapsed. Others, such as semi-natural ancient woodland, cannot be recreated. It is therefore preferable for development to be required to avoid direct impacts on designated sites.	No change is recommended, as compensation is already identified as a last resort in paragraph 22.20.
Potential impacts on protected and priority species and habitats in general should be assessed as described and mitigated as required and appropriate requirements for biodiversity enhancement should be conditioned.	No change is recommended, as paragraph 22.20 already states that mitigation or compensation will be secured through planning conditions and where necessary legal agreements.
Detailed reference should be made to the circumstances in which development will not be permitted and where development will be permitted only in exceptional circumstances of overriding public interest and where there are no alternative sites.	No change is recommended, as national planning policy requires a positive rather than a negative approach to development and the inclusion of criteria-based policies against which proposals for development on or affecting protected wildlife or geodiversity sites will be judged (National Planning Policy Framework, paragraph 113 refers).
Residual impacts must be addressed in accordance with a hierarchy including mitigation, compensation and Biodiversity Offsetting as described in the Natural Environment White Paper and DEFRA guidance.	While a sequence of 'avoid, mitigate and compensate' is accepted, national policy and guidance does not prefer on-site mitigation ahead of off-site mitigation. 'Biodiversity Offsetting' is a form of compensation. It is, therefore, recommended that Point 2 of Policy CS33 is amended to read: " <u>where criterion 1 cannot be satisfied</u> , adequate on-site or off-site mitigation can be provided that will secure a net gain to biodiversity or geodiversity;"
Paragraph 3 of Policy CS33 should be altered to read: "Development that could have an individual or in combination effect on a European Site or its supporting habitat, within or outside of the Borough, must provide sufficient information to enable compliance with the Habitats Regulations. <u>The integrity of international sites including SPA, SAC, and proposed, possible and candidate sites and RAMSAR sites) will be protected.</u> "	No change is recommended, as compliance with Regulation 61 of the Habitat Regulations already specifically requires that the integrity of international sites is protected. It is, therefore, recommended that a revised definition of European Sites is included in the Glossary.

Summary of Comments Received	Recommended Response
<p>Welcome the fact that the policy wording identifies that development that could have an individual or in combination effect on a European Site or its supporting habitat, within or outside of the Borough, must provide sufficient information to enable compliance with the Habitats Regulations, but Policy CS33 should also make reference to SAC/SPA designations as well as SSSIs.</p>	<p>Accepted. It is, therefore, recommended that Policy CS33 should be amended to read: “Development will be permitted where the applicant can demonstrate that:</p> <ol style="list-style-type: none"> 1. <u>there will be no adverse effect on a Site of Special Scientific Interest or on the integrity of a European Site; and</u> 2. the identified assets can be incorporated and enhanced within the layout of the development without any harm or net loss to biodiversity or geodiversity; or 3. <u>where criterion 2 cannot be satisfied,</u> adequate on-site or off-site mitigation can be provided that will secure a net gain to biodiversity or geodiversity; <u>and...</u>” <p>It is also recommended that a revised definition of European Sites is included in the Glossary.</p>
<p>Paragraph 5 of Policy CS33 should be altered to read: “Sites identified for specific protection, including any necessary mitigation <u>(which may include additional off site areas, management of international sites and the monitoring of such measures)</u> for the impact on European Sites and their supporting habitats, will be identified in a site-specific Local Plan.”</p>	<p>Accepted but it is recommended that paragraph 22.20 is amended to read: “<u>Mitigation on European Sites may include additional off site areas, management of international sites and the monitoring of such measures.</u>”</p>

Policy CS34 – Flood Risk and Coast Protection

Summary of Comments Received	Recommended Response
<p>The penultimate paragraph of Policy CS34 should be altered to read: "...where sufficient evidence is provided to demonstrate that there will be no adverse effects on coastal processes <u>or designated biodiversity assets of International, national and local importance (see Glossary for full list)</u>". Most of the coastline and large areas of coastal hinterland are designated wildlife sites or supporting habitat. Proposed activity may be subject to Habitats Regulations Assessment.</p>	<p>Accepted, but it is recommended that Policy CS34 is amended with simplified wording to read: "Proposals for new coastal protection and sea defence works will be permitted where they are in line with the recommendations of the adopted Shoreline Management Plan and emerging Wirral Coastal Strategy and where sufficient evidence is provided to demonstrate that there will be no adverse effects on coastal processes <u>or designated biodiversity or geodiversity assets.</u>" It is also recommended that paragraph 23.7 is amended to read: "Proposals for coastal defence works must therefore be supported by sufficient evidence to determine their wider impact on the coastline <u>and on designated biodiversity and geodiversity assets.</u>"</p>
<p>Policy CS34 currently has no reference to biodiversity or wildlife. Since most of the coast is internationally designated for wildlife and many parts of river valleys are Sites of Special Scientific Interest or Sites of Biological Importance and act as wildlife corridors, there should be explicit links to Policy CS30 and Policy CS33.</p>	<p>Accepted. It is recommended that Policy CS34 is amended to read: "Proposals for new coastal protection and sea defence works will be permitted where they are in line with the recommendations of the adopted Shoreline Management Plan and emerging Wirral Coastal Strategy and where sufficient evidence is provided to demonstrate that there will be no adverse effects on coastal processes <u>or designated biodiversity or geodiversity assets.</u>"</p>
<p>Paragraph 23.9 should be amended to read: "<u>This policy will be applied together with CS30, CS31, CS33 and CS35, because of the close links between the water environment, biodiversity, wildlife corridors and other green infrastructure.</u>"</p>	<p>Accepted, but it is recommended that paragraph 23.7 is amended with simplified wording to follow the recommended modification to Policy CS34 to read: "Proposals for coastal defence works must therefore be supported by sufficient evidence to determine their wider impact on the coastline <u>and on designated biodiversity and geodiversity assets.</u>"</p>
<p>A reference to the use of native plant material of local provenance should be included, in order to maintain and enhance biodiversity value.</p>	<p>Accepted but it is recommended that point 4 of Policy CS30 – Requirements for Green Infrastructure is amended to read: "contribute towards net gains for nature and the enhancement of ecological networks and preserve and enhance the setting of any biodiversity and geodiversity assets in line with Policy CS33, <u>including the use of native species where this is possible and feasible;</u>"</p>

Summary of Comments Received	Recommended Response
<p>Insufficient weight has been given to the effects of sea-level change. If sea-level rises by about 50 cms in the next 50 years, then average high tides will flood the car park alongside the Sailing School at West Kirby and Spring Tides will overtop the pavement of South Parade. Given that the climate is changing to become more extreme, there will be more storms and there will be frequent flooding of property in and around South Parade from Riversdale Road to the Sailing Club. Models suggest that anything greater will see flooding as far as West Kirby Railway station from Lingdale Road to Sandy Lane.</p>	<p>No change is recommended, as Policy CS34 already requires the consideration of climate change in line with the Shoreline Management Plan and Environment Agency Flood Maps to take account of sea level rise and flooding resulting from climate change.</p>

Policy CS35 – Drainage Management

Summary of Comments Received	Recommended Response
<p>Developers must be expected to contribute to maintenance of surface drainage for the life of the development or these features will not be sustainable. Paragraph 23.13 should be altered to read: <u>“Maintenance of the surface drainage for the life of the development will be funded by appropriate measures which may include developer contributions, planning conditions or legal agreements.”</u></p>	<p>No change is recommended, as the Council will be responsible for the adoption and subsequent maintenance of Sustainable Drainage Systems, which is already referred to in paragraph 23.13. The final thresholds and standards to be applied under the Flood and Water Management Act are, however, still to be issued and there may be a need for further amendment once these are issued, later in 2013.</p>
<p>Policy CS35 should use the same hierarchy as under the Building Regulations for methods of surface water discharge.</p> <p>The first paragraph of Policy CS35 should be changed to read: <u>“The availability of drainage infrastructure with capacity must be considered by all applicants to ensure that the following sustainable water management objectives are met:”</u></p> <p>Point 1 of Policy CS35, which refers to improving the capacity of the existing sewer system, should be deleted.</p> <p>The second paragraph of Policy CS35 should be changed to read: <u>“Development proposals must consider the availability of necessary surface water drainage, foul drainage, and sewage treatment capacity, or where capacity will be provided in time to serve any additional phase of the development without unacceptably reducing the level of service to existing users or causing harm to the environment based on the advice from the appropriate utilities provider.</u></p> <p>The second paragraph should be followed with a new paragraph to read: <u>“Development proposals must discharge surface water to one of the following, listed in order of priority:</u></p> <ol style="list-style-type: none"> <u>1. continue and / or mimic the site's current natural discharge process;</u> <u>2. store for later use;</u> <u>3. discharge into infiltration systems located in porous sub soils;</u> <u>4. attenuate flows into green engineering solutions such as ponds, swales or other open water features for gradual release to a watercourse and/or porous sub soils;</u> 	<p>Accepted. It is recommended that Policy CS35 is amended, with some minor alterations of wording, to read:</p> <p><u>“The availability of drainage infrastructure of adequate capacity must be considered by all applicants, to ensure that the following sustainable water management objectives are met:</u></p> <ol style="list-style-type: none"> <u>1. to reduce surface water flooding;</u> <u>2. to manage surface water in a sustainable, effective and appropriate way; and</u> <u>3. to incorporate measures that will prevent a detrimental impact on the water environment through changes in water chemistry or resource.</u> <p><u>Development proposals must consider the availability of any necessary surface water drainage, foul drainage and sewage treatment capacity or where capacity will be provided in time to serve any additional phase of the development, without unacceptably reducing the level of service to existing users or causing harm to the environment based on the advice from the appropriate utilities provider.</u></p> <p><u>Development proposals must discharge surface water in one or more of the following ways, listed in order of priority:</u></p> <ol style="list-style-type: none"> <u>1. continue and/or mimic the site's current natural discharge process;</u> <u>2. store for later use;</u> <u>3. discharge into infiltration systems located in porous sub soils;</u> <u>4. attenuate flows into green engineering solutions such as ponds, swales or other open water features for gradual release to a watercourse and/or porous sub soils;</u> <u>5. attenuate by storing in tanks or seals systems for gradual release to a</u>

Summary of Comments Received	Recommended Response
<p><u>5. attenuate by storing in tanks or seals systems for gradual release to a watercourse;</u> <u>6. direct discharge to a watercourse;</u> <u>7 direct discharge to a surface water sewer; or</u> <u>8. controlled discharge into the combined sewerage network, only if it can be demonstrated that there are no other viable options... “</u></p>	<p><u>watercourse;</u> <u>6. direct discharge to a watercourse;</u> <u>7 direct discharge to a surface water sewer; or</u> <u>8. controlled discharge into the combined sewerage network, only if it can be demonstrated that there are no other viable options...“</u></p>
<p>Paragraph 23.11 should be re-ordered and replaced with: "New development should therefore manage surface water at source in a sustainable, effective and appropriate way. <u>Development proposals must demonstrate</u> no additional run-off from greenfield sites and a 30 percent reduction from previously developed sites, with a 50 percent reduction from sites in critical drainage areas identified in Surface Water Management Plans. <u>Applicants will be required to demonstrate, with evidence, how they have applied the drainage hierarchy set out in Building Regulations 2010 H3 Rainwater Drainage, which requires applicants to discharge surface water in order of priority, starting with an adequate soakaway, followed by a watercourse, with a sewer being the last resort. If it is demonstrated that it is necessary to discharge to watercourse or public sewer, then any discharge will be at an attenuated discharge rate."</u></p>	<p>Accepted. It is recommended that paragraph 23.11 is re-ordered and amended to read: "New development should therefore manage surface water at source in a sustainable, effective and appropriate way. <u>Development proposals must demonstrate</u> no additional run-off from Greenfield sites and a 30 percent reduction from previously developed sites, with a 50 percent reduction from sites in critical drainage areas identified in Surface Water Management Plans. <u>Applicants will be required to demonstrate, with evidence, how they have applied the drainage hierarchy set out in Building Regulations 2010 H3 Rainwater Drainage, which requires applicants to discharge surface water in order of priority, starting with an adequate soakaway, followed by a watercourse, with a sewer as the last resort. If it is demonstrated that it is necessary to discharge to a watercourse or public sewer, then any discharge must be at an attenuated discharge rate."</u></p>

Policy CS36 – Pollution and Risk

Summary of Comments Received	Recommended Response
An additional reference to high pressure oil pipelines, which pass through the urban, industrial and residential areas in Bebington, could be included in the supporting text of Policy CS36.	No change is recommended, as Policy CS36 does not identify any site-specific constraints within the Borough. Policy CS42 – Development Management provides for the protection of pipelines and their safeguarding zones and a reference to the presence of pipelines in each particular Settlement Area is included in the Spatial Portrait.

Policy CS37 – Contamination and Instability

Summary of Comments Received	Recommended Response
An additional reference to high pressure oil pipelines, which pass through the urban, industrial and residential areas in Bebington, could be included in the supporting text of Policy CS37.	No change is recommended, as Policy CS37 does not identify any site-specific constraints within the Borough. Policy CS42 – Development Management provides for the protection of pipelines and their safeguarding zones and a reference to the presence of pipelines in each particular Settlement Area is included in the Spatial Portrait.
Paragraph 23.20 (or paragraph 22.22) should be altered to read " <u>Plans to deal with invasive species will be required as part of planning applications, where such species are present.</u> "	Accepted. It is has already been recommended that paragraph 22.22 is amended to read: "The impact of invasive species is considered in Policy CS37 below. <u>Plans to deal with invasive species will be required as part of planning applications, where such species are present.</u> " It is, however, also recommended that the first paragraph of Policy CS37 is amended to read "Development proposals likely to affect land known or suspected to be unstable or contaminated <u>including by invasive species</u> must be supported by an appropriate contamination or ground stability assessment that identifies;"

Policy CS38 – Minerals

Summary of Comments Received	Recommended Response
Point 4 of Policy CS38 should be altered to read: " <u>and may include suitable long-term management, during the life of the development, of land not currently being worked,</u> " to make it clear that mitigation will be secured whether the site is being worked or not, in accordance with paragraph 143 of the National Planning Policy Framework the accompanying Technical Guidance (March 2012).	Accepted. It is recommended that point 4 of Policy CS38 is amended to read: "adequate provision for the mitigation of any negative impacts will be secured <u>during operations and periods when the site is not being worked;</u> " It is also recommended that paragraph 24.1 is strengthened to read: "Minerals are an important economic asset but the exploration, working, storage, processing and distribution of minerals can have harmful effects on the environment. <u>In line with national policy, applicants will need to demonstrate that mineral sites can be sensitively designed and operated in a way to ensure there are no unacceptable adverse impacts on the environment or human health, which should be linked to a long-term management plan and landscape strategy during the life of the scheme. The land should be restored at the earliest opportunity in accordance with an aftercare scheme and a budget that makes provision for high quality restoration, aftercare, after-use and a final landform consistent with landscape character of the surrounding area.</u> "
Point 5 of Policy CS38 should say that: " <u>appropriate restoration will be expected to enhance biodiversity and geodiversity as appropriate</u> ".	No change is recommended as point 5 of Policy CS38 already says that: "sensitive environmental restoration and aftercare of sites will be secured at the earliest opportunity, to a standard and manner consistent with the character, setting and landscape of the surrounding area;" and provision to protect and enhance biodiversity and geo-diversity is already contained within Policy CS33 – Biodiversity and Geodiversity.
Paragraph 24.5 may need amending in the light of the recent award of a coal gasification licence for the Dee Estuary to Cluff Natural Resources.	No change is recommended because there is no indication that production in Wirral would be either possible or viable.
A reference to energy pipelines could be included in the supporting text to Policy CS38.	No change is recommended to Policy CS38 because the safeguarding of pipelines is already provided for under Policy CS42 – Development Management.
National policy also requires the Council to set out policies to enable prior extraction of minerals where non-minerals development is to take place.	No further change is recommended because, following consultation with the mineral industry, it has been confirmed that Wirral has no workable resources for land-won crushed rock, sand, gravel or industrial minerals. The only workable site for clay extraction, which is already identified on the Unitary Development Plan Proposals Map, is used intermittently and further work relating to safeguarding will be undertaken to inform a site specific Local Plan.

Summary of Comments Received	Recommended Response
<p>Policy CS38 does not safeguard the known locations of specific minerals resources of local or national importance, which should be done through the defining of a Mineral Safeguarding Area in the Core Strategy in line with national policy and up-to-date mineral safeguarding advice. It is not sufficient to outline only the intention to safeguard land in general terms. Policy CS38 needs to safeguard all known mineral resources, in particular clay, and cannot solely safeguard permitted reserves. It is not sufficient to rely upon land ownership to safeguard minerals from unnecessary sterilisation caused by incompatible development. Permitted reserves in Wirral are already at risk from encroachment from incompatible development. Existing, planned and potential rail head and wharfage, such as the existing mineral wharf at Eastham should also be safeguarded. Landings of marine minerals at Eastham have remained fairly consistent and on average represent up to 30% of total landings in the North West and are strategically significant. Regional assumptions of marine dredged aggregate should not be used as an indicator of the need for safeguarding as annual landings in the North West have never been at the assumed rate of 937,500 tonnes but have been on average between 400,000 - 600,000 tonnes.</p>	<p>Accepted. It is recommended that Policy CS38 is amended to read: <u>“Land that should be safeguarded around mineral resources and facilities that are considered to be of economic importance will be included in a site specific Local Plan. Mineral resources and facilities within safeguarded areas will be protected against unnecessary sterilisation by other development.”</u> in line with British Geological Survey Good Practice Advice OR/11/046 and National Planning Policy Framework, paragraph 143. It is also recommended that paragraph 24.4 is amended to read: <u>“Marine-won sand and gravel from Liverpool Bay has previously been landed at port facilities at Birkenhead and Eastham and is currently landed at a purpose-built facility on the Bromborough coast. Annual landings have been as high as 124,000 tonnes but over recent years have reduced to just over 92,000 tonnes, on average representing up to 30 percent of total landings in the North West. A more up-to-date Local Aggregates Assessment is currently being jointly prepared by the Merseyside and Greater Manchester authorities, to agree the local apportionment of minerals requirements.”</u></p>

Policy CS40 – Transport Requirements

Summary of Comments Received	Recommended Response
Point 10 of Policy CS40 should be amended to change the reference to 'severe cumulative impacts' to 'significant detrimental cumulative impacts', as the alternative could result in major unacceptable impacts to the transport network that could have an impact on neighbouring areas.	No change is recommended because the proposed wording complies with paragraph 32 of the National Planning Policy Framework, which states that “development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.”
The Core Strategy should be reviewed and updated in light of the new statistics from the 2011 Census.	No change is recommended, because the Census has no direct bearing on the implementation of Policy CS40.
Policy CS40 is supported but additional points should be added to require proposals to demonstrate that they will provide the maximum accessibility for pedestrians to and from nearby sustainable transport nodes, with frontages facing streets and with clearly defined pedestrian/disabled access routes provided; not be designed in the form of enclosed compounds designed principally for vehicular access; and should be designed to ensure that lengthy, circuitous routes for pedestrians/disabled citizens are avoided. These criteria are necessary to ensure that the wider sustainability objectives can actually be delivered, by making sustainable design an express requirement rather than something merely hoped for.	No change is recommended because Policy CS40 already requires development to support the greater use of public transport, walking and cycling and provide accessible, safe and attractive facilities for pedestrians, suitable for all abilities and ages; and Policy CS43 – Design, Heritage and Amenity, already promotes design solutions that will “align entrances to buildings with active frontages in the public realm”.
Policy CS40 is supported but needs to consider the impact of extra facilities by adding "not require extra transport facilities which would harm the natural, water or built environment".	No change is recommended, as transport requirements under Policy CS40 must already specifically comply with Policy CS42 – Development Management.

Policy CS41 – Transport Schemes

Summary of Comments Received	Recommended Response
Point 2 of Policy CS41 should be altered to read: “schemes to support the delivery and integration of Wirral Waters and the Mersey Waters Enterprise Zone with the surrounding areas, <u>including the Wirral Street Car</u> .”	No change is recommended, as the Wirral Street Car is one potential solution and the existing more general wording offers greater flexibility to a wider range of possible solutions. A reference to the Wirral Street Car will however be included in the accompanying Core Strategy Infrastructure Plan.
Policy CS41 is welcomed but Point 3 should be amended to read: “schemes to facilitate greater use of public transport and to support <u>greater, more efficient use of and improved access to the rail network</u> ”	No change is recommended because the existing wording would already support these objectives, by supporting the more efficient use of the rail network.
Point 5 of Policy CS41, instead of only protecting routes that are 'critical', should protect existing routes and those where there is potential for the development of future sustainable transport infrastructure. Unsustainable schemes, such as road-widening projects, which will only provide more road capacity, should not receive policy protection.	No change is recommended because the existing wording would allow the protection of all routes that may be critical in developing future transport infrastructure, where a scheme has been identified.
Recognition needs to be given to the condition, comfort and security of railway stations.	No change is recommended because the existing wording would already support schemes to facilitate the greater use of public transport, which would include railway station improvements.
There should be clear policy support for key transport infrastructure aspirations to protect and enhance the accessibility of the Borough by protecting the route of the Birkenhead Docks rail link via Rock Ferry for potential future public transport purposes; providing for the possible reopening of the Birkenhead Docks rail link via Bidston for freight purposes relating to the Port of Liverpool, subject to feasibility and demand; for improvements to the Borderlands Railway Line; and transport improvements associated with Wirral Waters.	No change is recommended because Policy CS41 already provides for schemes to promote improved access to the ports and Birkenhead Town Centre and to support the delivery and integration of Wirral Waters. The greater use of the Borderlands railway line is identified as a priority in Policy CS6 – Priorities for Suburban Birkenhead, Policy CS10 – Priorities for Heswall and Policy CS11 – Priorities for the Rural Areas.
An additional point should protect all existing rail corridors, including freight lines that are currently out of use, for future rail use, and encourage the ongoing maintenance of all routes.	No change is recommended because Policy CS40 – Transport Requirements already provides for alignments for future road, rail or active travel provision to be safeguarded.

Policy CS42 – Development Management

Summary of Comments Received	Recommended Response
Point 3 of Policy CS42 needs to be strengthened to reduce "uncertain" impacts to read: " <u>Protect existing biodiversity and geodiversity assets and contribute towards...</u> "	Accepted. It is recommended that point 3 of Policy CS42 is amended to read: " <u>protect biodiversity and geodiversity and contribute towards the provision of appropriate green infrastructure and the protection of land needed for recreation subject to Policies CS30 to CS33</u> ".
Policy CS42 should be broadened to also address the detailed approach to proposals affecting archaeological remains of less than national importance and issues relating to development and demolition in conservation areas.	Accepted but it is recommended to address these comments by including them within the definition of heritage assets within the Glossary.
Policy CS42 is not necessary as there is no need to refer back to a generic gateway policy if a proposal is already specifically considered against an appropriate individual policy, such as Policy CS2.	No change is recommended because it is reasonable to provide links to relevant policies that cover matters that will need to be considered to deliver sustainable development through the development management process and the inclusion of Policy CS42 prevents the unnecessary duplication of criteria within the topic-specific policies contained throughout the Core Strategy.
Point 11 of Policy CS42 should be amended to read: " <u>Will not have an unacceptable impact on the operation of Liverpool Airport...</u> " rather than "take full account of notified airport safety zones for..." to ensure that inappropriate development is resisted.	Accepted. It is recommended that point 11 of Policy CS42 is amended to read: " <u>not have an unacceptable impact on the operation of Liverpool John Lennon Airport, Hawarden Aerodrome and the Wallasey Beacon, utilities, pipelines, important electrical equipment or instrumentation or their safeguarding zones;</u> "
Private developers should also be required to meet standards for Lifetime Homes and the Code for Sustainable Homes and the HCA's DQ8 standards.	No change is recommended to Policy CS42 as these matters are dealt with under criteria within Policy CS43 – Design, Heritage and Amenity.
Paragraph 26.1 should be amended to read: "Policy CS42 <u>sets out key development control criteria which will be used in the determination of planning applications and making other decisions under the Town and Country Planning Acts...</u> " as it is inappropriate to refer to Policy CS42 as "a gateway policy that will be used as a starting point".	Accepted but an alternative wording is recommended to amend paragraph 26.1 to read: "Policy CS42 <u>brings together all the main requirements of the Core Strategy</u> for determining planning applications and making other decisions under the Town and Country Planning Acts..."

Summary of Comments Received	Recommended Response
<p>There is no policy to support borough-wide community facilities. Although these items are included in policies for specific areas, there is not enough detail to reflect national policy and the Core Strategy Sustainability Appraisal. A development management policy should be included to protect existing and provide for new community facilities on a Borough-wide basis along the lines of 'The Council will protect existing community and cultural facilities by resisting their loss or change of use unless replacement facilities are provided on site or within the vicinity which meets the need of the local community, or necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision, and it has been demonstrated that there is no demand for another similar use on site.. A description for the term 'community facilities' should also be included in the Glossary or accompanying text to read: 'Community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community.'</p>	<p>No change is recommended as provision for community facilities is made within Policy CS26 – Criteria for Development Within Existing Centres and as part of safeguarding and enhancing the vitality and viability of town, district and local centres as the focus for services and community facilities under the local priorities identified within Policies CS4 to CS11.</p>

Policy CS43 – Design, Heritage and Amenity

Summary of Comments Received	Recommended Response
Point 5 of Policy CS43 needs to be strengthened to reduce "uncertain" impacts to add a reference to mature trees and hedges, which are just as important as fences to the streetscene.	No change is recommended, as point 5 of Policy CS43 already refers to landscaping, which includes trees and hedgerows.
The second half of paragraph 26.6 should be replaced to say: " <u>Developers will be required to take into account current best practice set out in guidance such as the Code for Sustainable Homes, BREEAM, Lifetime Homes Standard, NAHA Housing Quality Indicators and their equivalents. Normally applications will have to meet CSH4 from 2014 and CSH 6 from 2016, BREEAM Very Good, or equivalent, to help implement the required reduction in output of greenhouse gases from Wirral</u> ", so that developers will have to explain why they do not intend to build to these standards. As these standards have already been applied to Wirral Waters they should also apply to other developments.	No change is recommended, at this stage, to the proposal for higher voluntary standards to be imposed through Policy CS43. The Government advises that additional voluntary requirements should not be confused with statutory requirements under the Building Regulations. As additional non-statutory requirements can often impose an additional cost on development, the Council's approach has been to negotiate but not require a higher voluntary standard of environmental performance where viable. The impact of additional requirements on development viability will be tested in the forthcoming Core Strategy Viability Study. Paragraph 26.6 already indicates that developers will have "to justify why any appropriate measures have not been included", with reference to BREEAM, Code for Sustainable Homes, Lifetime Homes, national Affordable Homes Agency Housing Quality Indicators and their equivalents. It is, however, recommended that paragraph 26.6 is amended to read: "In complying with Policy CS43, developers will, therefore, be encouraged to take account of <u>current best practice</u> ..."
While the reference to telecommunications in Policy CS43 is supported the wording of the last paragraph with regard to safety is ambiguous and needs to be brought into line with paragraph 45 of the National Planning Policy Framework.	Accepted. It is recommended that Policy CS43 is amended to read: "Applications for radio and telecommunications <u>development</u> must also demonstrate that the apparatus proposed <u>cannot be located on an existing building</u> ..." and that an additional sentence is added to read: " <u>Telecommunications operators must also demonstrate that the apparatus proposed will not cause significant and irreparable interference with other electrical equipment, air traffic services or instrumentation of national interest and that cumulative exposure to telecommunications development would not exceed the International Commission on Non-Ionising Radiation Protection Guidelines.</u> "
Point 2 of Policy CS43 should be amended to cross-refer to Policy CS30 – Requirements for Green Infrastructure.	Accepted. It is recommended that point 2 of Policy CS43 is amended to read: "address the need for appropriate green infrastructure <u>in line with Policy CS30</u> ;"

Policy CS44 – Phasing and Infrastructure

Summary of Comments Received	Recommended Response
Policy CS44 is not clear enough about what the expectations and conditions ought to be. Greater definition is required, particularly as the Council is not yet a Charging Authority for CIL.	No change is recommended because granting planning permission for developments that cannot be supported by necessary infrastructure is not sustainable development. The objective of Policy CS44 is to enable the Council to refuse or phase development until the required infrastructure is in place, regardless of how or by whom that infrastructure is provided. Further information related to expectations and conditions is provided in Policy CS45 – Developer Contributions and the accompanying Core Strategy Infrastructure Plan.
It is accepted that a phased approach may be needed to allow new or upgrading improvements to water and/or wastewater infrastructure but paragraph 26.12 should be deleted and paragraph 26.13 should be amended to read: <u>'Applicants must consider the availability of water and wastewater infrastructure to serve the proposed development.'</u>	Accepted. It is recommended that paragraph 26.12 is deleted. It is not recommended to amend paragraph 26.13, as the need for “drainage, water supply and treatment infrastructure” is already addressed in paragraph 26.11.
Policy CS44 should be amended to say " <u>Where necessary to protect biodiversity, the Council may require mitigation to be carried out before the main development starts</u> " as mitigation for harm to biodiversity often needs to be in place, or at least started, before a development happens and a gap of months or even years between one habitat being destroyed and a new one being created will cause wildlife to die or elsewhere.	Accepted but the wording of Policy CS44 is already sufficiently effective to prevent development from starting before necessary infrastructure, including wildlife habitat, has been provided. It is therefore recommended that paragraph 26.11 is amended to read: “This includes provision for highway works, drainage, water supply and treatment infrastructure and the provision of mitigation for the impact on European Sites and their supporting habitats and other biodiversity assets”.

Policy CS45 – Developer Contributions

Summary of Comments Received	Recommended Response
The second bullet point for the Community Infrastructure Levy of Policy CS45 should be altered to add “and other biodiversity/geodiversity assets” as well as Local Nature Reserves.	No change is recommended, as the second point is intended to refer to habitats of district-wide significance and “open spaces and green infrastructure”, which includes biodiversity, and geodiversity assets are already referred to.
A summary policy which cross-refers to other policy requirements elsewhere is helpful but all requirements need to be subject to a viability assessment on a site-by-site basis and follow the requirements of the Community Infrastructure Levy Regulations.	Not change is recommended to Policy CS45. A Community Infrastructure Levy would already be subject to statutory viability assessment and independent examination, as set out in paragraph 27.6. Reference to viability in relation to planning obligations would not be appropriate as the omission of elements that would be essential to make a development acceptable in planning terms may lead to the planning application being refused. It is, however, recommended that, for the avoidance of doubt, the last sentence of paragraph 27.2 is amended to read: “Requirements will also <u>have regard for viability</u> and be flexible to safeguard against substantial or unexpected changes in market conditions.”
Policy CS45 does not recognise proportionality or viability and does not reflect the spirit invoked by NPPF.	No change is recommended to Policy CS45. It has already been recommended to amend paragraph 27.2 to refer to viability. The first paragraph of Policy CS45 clearly states that the Council will only seek planning obligations that are necessary to make development acceptable in planning terms and paragraph 27.2 recognises that requirements must be flexible to safeguard against changes in market conditions. A Community Infrastructure Levy must be subject to viability assessment and independent public examination, which is already set out in paragraph 27.6. A reference to viability in relation to planning obligations would not be appropriate, as the omission of elements that would be essential to make a development acceptable in planning terms may lead to the planning application being refused.
Development in the Green Belt which will require new public transport or other sustainable mode infrastructure/services should be paid for by the development itself.	No change is recommended, as Policy CS45 already seeks to ensure that developers make reasonable provision to mitigate the impact of development and achieve the objectives of sustainable development. Policy CS40 – Transport Requirements sets out the requirements for new development proposals.

Summary of Comments Received	Recommended Response
More specific guidance relating to biodiversity is desirable. Contributions to biodiversity should go to an equivalent habitat, preferably in the same or an adjacent Settlement Area. When will a date be set for the introduction of a CIL and Biodiversity Offsetting?	No change is recommended, as the requirements for the provision of green infrastructure and biodiversity/geodiversity assets are already included in Policy CS30 – Requirements for Green Infrastructure and Policy CS33 – Biodiversity and Geodiversity, which are already referred to in Policy CS45. If viable, the introduction of a Community Infrastructure Levy will follow the completion of the Core Strategy Viability Study.