

LPSP-1001

Comment ID	LPSP-1001
Person ID	1324088
Include files	LPSP-716, 998-1001, 1003-1010, 1015-1019, 1021-1025, 1027-1029-EM-Dickson Attachment 2507_Redacted.pdf
Consultee Name	Mr Mike Horner
Position	
Company / Organisation	Wirral Growth Company
Agent ID	1324087
Agent Name	Mr Greg Dickson
Position	
Company / Organisation	Barton Willmore (Stantec)
Number	Policy WS 1.1
Title	Homes
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1.1
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	Please refer to attachment. Policy WS1.1 identifies that as a minimum 13,360 new dwellings will be provided in the period between 2021-2037 (i.e. 835 dwellings per annum). WGC are supportive of the Council using the Government's standard methodology as the starting point for determining the number of homes needed over the plan period. WGC also fully supports housing growth being directed to and delivered in the identified Regeneration Areas (including Birkenhead) as well as through the reuse of the land at Pasture Road in Moreton. In line with the ambitions of the Local Plan, a planning application for the land at Pasture Road is currently being prepared for submission
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be	

as precise as possible.	
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	

Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

- * No, I do not wish to participate in hearing session(s)
- * Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why

<p>you consider this to be necessary:</p>	
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	

LPSP-1002

Comment ID	LPSP-1002
Person ID	1324015
Include files	LPSP-985,991-993, 995, 1002, 1011-1014, 1026, 1030, 1031, 1075-1080,1100-1143,1150-1174, 1425-EM-Leyssens Attach 2 of 9 2507_Redacted.pdf
Consultee Name	Mr Andrew Leyssens
Position	
Company / Organisation	United Utilities
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WP 6.3
Title	Residential Sites
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	RES-SA6.8

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer to attachment. Groundwater Source Protection Zones The Environment Agency has defined Groundwater Source Protection Zones (SPZs) for groundwater sources, which are often used for public drinking water supply purposes. The prevention of pollution to drinking water supplies is critical. The SPZs signify where there may be a particular risk from activities on or below the land surface. Such activities include construction. The details of SPZs can be viewed on the website of the Environment Agency.

	<p>We wish to highlight that new development sites are more appropriately located away from locations which are identified as sensitive groundwater protection areas especially within and adjacent to Groundwater Source Protection Zone 1 (SPZ1) which is closest to the water abstraction point and the most sensitive. This is of relevance given the presence of SPZs in the Wirral.</p> <p>We welcome the inclusion of wording for the protection of the drinking water supply in Policy WD14 (E).</p>
<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you</p>	<p>Whilst no allocations are identified in SPZ1, the following sites are identified to be within SPZ2.</p> <ul style="list-style-type: none"> • RES-SA6.8 Ridge Rowans, 25 Whetstone Lane, West Kirby

<p>consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<ul style="list-style-type: none"> • RES-SA3.7 4 Dingle Road, Tranmere • RES-SA6.11 7 Caldby Road, West Kirby • MPA-RA4.2 Charing Cross Quarter • RA4 Birkenhead Regeneration Framework Area • RA4 Central Birkenhead Regeneration Area <p>We suggest that this is referenced in the site-specific policies for the respective sites.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the</p>	

hearing session(s), please outline why you consider this to be necessary:	
<p>Notification of Next Stages in Wirral's Local Plan</p> <p>Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	

LPSP-1003

Comment ID	LPSP-1003
Person ID	1324088
Include files	LPSP-716, 998-1001, 1003-1010, 1015-1019, 1021-1025, 1027-1029-EM-Dickson Attachment 2507_Redacted.pdf
Consultee Name	Mr Mike Horner
Position	
Company / Organisation	Wirral Growth Company
Agent ID	1324087
Agent Name	Mr Greg Dickson
Position	
Company / Organisation	Barton Willmore (Stantec)
Number	Policy WS 1.2
Title	Employment
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1.2
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment "Policy WS1.2 of the Local Plan sets out the ambition to drive forward the economic growth aspirations of the Borough. This ambition is fully supported but it is suggested that the draft Local Plan could be clearer on which uses will be supported in designated employment areas (i.e. Use Class B2/B8 or does this also extend to include office and Research and Development ('RnD') – Use Class Eg(i) and (ii)). If office and RnD (Use Class Eg(i) and (ii)) are to be included, then Birkenhead Commercial District should be identified as a location that will support and realise the economic aspirations of the Borough.

<p>as precise as possible.</p>	<p>Furthermore, it is difficult to understand which of the areas identified in part E of the draft Policy will be protected and which will contribute towards meeting the future employment land requirement.</p> <p>To make this clear, it is suggested that the sites to be protected as Existing Primarily Industrial Areas should be listed separately to sites allocated for the development of new employment uses.</p> <p>It is also unclear from the distribution table in Policy WS1.2 which sites are included within each element of the supply. It is, therefore, suggested (for clarity) that this should be linked to the trajectory of Employment Sites at Appendix 6.</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	

<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>The Plan could be clearer on which uses will be supported in designated employment areas.</p> <p>Sites to be protected as Existing Primarily Industrial Areas should be listed separately to sites allocated for the development of new employment uses.</p> <p>The distribution table in Policy WS1.2 should be linked to the trajectory of Employment Sites at Appendix 6.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	

Comment ID	LPSD-1004
Person ID	1324088
Include files	LPSD-716, 998-1001, 1003-1010, 1015-1019, 1021-1025, 1027-1029-EM-Dickson Attachment 2507_Redacted.pdf
Consultee Name	Mr Mike Horner
Position	
Company / Organisation	Wirral Growth Company
Agent ID	1324087
Agent Name	Mr Greg Dickson
Position	
Company / Organisation	Barton Willmore (Stantec)
Number	Policy WS 2
Title	Social Value
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 2
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	Please refer to attachment As is already ongoing as part of the construction of the Phase 1 office buildings in Birkenhead, WGC supports developments securing and delivering social benefits through local labour agreements as well as the local sourcing of products and materials (where possible to do so).
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be	

as precise as possible.	
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
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If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

- * No, I do not wish to participate in hearing session(s)
- * Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why

Yes, I wish to participate in hearing session(s)

<p>you consider this to be necessary:</p>	
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	

LPSP-1005

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Person ID	1324088
Include files	LPSP-716, 998-1001, 1003-1010, 1015-1019, 1021-1025, 1027-1029-EM-Dickson Attachment 2507_Redacted.pdf
Consultee Name	Mr Mike Horner
Position	
Company / Organisation	Wirral Growth Company
Agent ID	1324087
Agent Name	Mr Greg Dickson
Position	
Company / Organisation	Barton Willmore (Stantec)
Number	Policy WS 3.2
Title	Housing Density
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.2
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be	_Pleaser refer to attachment Policy WS 3.2 seeks to define minimum densities for sites and development zones across the Wirral. WGC welcomes the identification of sites and zones which can accommodate increased densities but also welcome the clause that allows for alternative densities if it can be demonstrated that it is not appropriate (having regard to the characteristics, at a particular site). In addition to this and for completeness, it is recommended that Policy WS 3.2 should include a viability clause (to ensure viable development of a lower density is not unduly restricted on a site-specific basis).

as precise as possible.	
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	Policy WS 3.2 should include a viability clause.

Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

- * No, I do not wish to participate in hearing session(s)
- * Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why

Yes, I wish to participate in hearing session(s)

<p>you consider this to be necessary:</p>	
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Person ID	1324088
Include files	LPSD-716, 998-1001, 1003-1010, 1015-1019, 1021-1025, 1027-1029-EM-Dickson Attachment 2507_Redacted.pdf
Consultee Name	Mr Mike Horner
Position	
Company / Organisation	Wirral Growth Company
Agent ID	1324087
Agent Name	Mr Greg Dickson
Position	
Company / Organisation	Barton Willmore (Stantec)
Number	Policy WS 3.3
Title	Affordable Housing Requirements
To which part of the Local Plan does this representation relate?	Policy
<ul style="list-style-type: none"> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment 	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.3
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment In accordance with the ambition of Policy WS 3.3, WGC supports the delivery of tenure blind affordable housing on sites across the Borough. Given the differentiation between housing market areas across (on the Wirral), WGC supports the categorisation of 'viability zones' for establishing affordable housing requirement. In addition, WGC supports the requirement for each zone to be subject to viability testing. However, we would propose that a 'subject to viability' clause is still included in the wording of the policy. Furthermore, if the affordable housing

as precise as possible.	requirement is to be zonal (as proposed) it is suggested that a map should be provided to aid identification of each of the zones/market areas. In light of the viability challenges on sites in neighbourhoods across the Borough (viability zone 1 and 2), WGC is supportive of part E of Policy WS 3.3. as this allows for multi-phase sites to reduce its affordable housing requirement on the initial or early phases of development if this is needed to enable a financially viable development in the short term (with the full requirement to then be met on future phases of development).
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
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If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you	Include a 'subject to viability' clause in the policy. Provide a map to aid identification of each of the viability zones/market areas.

consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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Yes, I wish to participate in hearing session(s)

If you wish to participate in the

<p>hearing session(s), please outline why you consider this to be necessary:</p>	
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Person ID	1324088
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Consultee Name	Mr Mike Horner
Position	
Company / Organisation	Wirral Growth Company
Agent ID	1324087
Agent Name	Mr Greg Dickson
Position	
Company / Organisation	Barton Willmore (Stantec)
Number	Policy WS 3.6
Title	Specialist Housing
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.6
Please state which Site ID/Reference this	

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Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	Please refer to attachment Policy WS 3.6 is supported by WGC and the requirement set out for older people with specialist housing needs aligns with the proposal for a care/extra care housing development on the northwest parcel of the Priority Site at Pasture Road, Moreton.
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be	

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If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

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- * Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why

Yes, I wish to participate in hearing session(s)

<p>you consider this to be necessary:</p>	
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	

LPSP-1008

Comment ID	LPSP-1008
Person ID	1324088
Include files	LPSP-716, 998-1001, 1003-1010, 1015-1019, 1021-1025, 1027-1029-EM-Dickson Attachment 2507_Redacted.pdf
Consultee Name	Mr Mike Horner
Position	
Company / Organisation	Wirral Growth Company
Agent ID	1324087
Agent Name	Mr Greg Dickson
Position	
Company / Organisation	Barton Willmore (Stantec)
Number	Policy WS 4.1
Title	Meeting the Strategy
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 4.1
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	Please refer attachment In line with its proposals for the Priority Sites in Birkenhead and Moreton, WGC is supportive of the identification of town centres across the Borough as locations for employment and business. Generally, development alongside the introduction of new housing (where appropriate).
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be	

as precise as possible.	
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	

Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

- * No, I do not wish to participate in hearing session(s)
- * Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why

Yes, I wish to participate in hearing session(s)

<p>you consider this to be necessary:</p>	
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	

Comment ID	LPSD-1009
Person ID	1324088
Include files	LPSD-716, 998-1001, 1003-1010, 1015-1019, 1021-1025, 1027-1029-EM-Dickson Attachment 2507_Redacted.pdf
Consultee Name	Mr Mike Horner
Position	
Company / Organisation	Wirral Growth Company
Agent ID	1324087
Agent Name	Mr Greg Dickson
Position	
Company / Organisation	Barton Willmore (Stantec)
Number	Part 1
Title	Introduction and Background
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	Part 1
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	WGC understands that the Local Plan will form the principal development plan document in the period up to 2037 and inform decision making throughout the plan period, replacing the existing Unitary Development Plan ('UDP') which was adopted in 2000. It is clear that the Local Plan has been prepared to set out the proposed housing, employment and infrastructure requirements and how the Council proposed that these will be met on the Wirral over the next 15 years.
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be	

as precise as possible.	
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	

Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

- * No, I do not wish to participate in hearing session(s)
- * Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why

Yes, I wish to participate in hearing session(s)

you consider this to be necessary:	
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	

Comment ID	LPSD-1010
Person ID	1324088
Include files	LPSD-716, 998-1001, 1003-1010, 1015-1019, 1021-1025, 1027-1029-EM-Dickson Attachment 2507_Redacted.pdf
Consultee Name	Mr Mike Horner
Position	
Company / Organisation	Wirral Growth Company
Agent ID	1324087
Agent Name	Mr Greg Dickson
Position	
Company / Organisation	Barton Willmore (Stantec)
Number	Policy WS 4.4
Title	Tourism
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 4.4
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	Please refer to attachments WGC supports Policy WS 4.4 including the identification of Birkenhead (central and commercial area) as an appropriate location for the development of hotels , tourist attractions and visitor facilities.
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be	

as precise as possible.	
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	

Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

- * No, I do not wish to participate in hearing session(s)
- * Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why

Yes, I wish to participate in hearing session(s)

you consider this to be necessary:	
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	

LPSD-1011

Comment ID	LPSD-1011
Person ID	1324015
Include files	LPSD-985,991-993, 995, 1002, 1011-1014, 1026, 1030, 1031, 1075-1080,1100-1143,1150-1174, 1425-EM-Leyssens Attach 2 of 9 2507_Redacted.pdf
Consultee Name	Mr Andrew Leyssens
Position	
Company / Organisation	United Utilities
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WP 3.3
Title	Residential Sites
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	RES-SA3.7

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer to attachment. Groundwater Source Protection Zones The Environment Agency has defined Groundwater Source Protection Zones (SPZs) for groundwater sources, which are often used for public drinking water supply purposes. The prevention of pollution to drinking water supplies is critical. The SPZs signify where there may be a particular risk from activities on or below the land surface. Such activities include construction. The details of SPZs can be viewed on the website of the Environment Agency.

	<p>We wish to highlight that new development sites are more appropriately located away from locations which are identified as sensitive groundwater protection areas especially within and adjacent to Groundwater Source Protection Zone 1 (SPZ1) which is closest to the water abstraction point and the most sensitive. This is of relevance given the presence of SPZs in the Wirral.</p> <p>We welcome the inclusion of wording for the protection of the drinking water supply in Policy WD14 (E).</p>
<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you</p>	<p>Whilst no allocations are identified in SPZ1, the following sites are identified to be within SPZ2.</p> <ul style="list-style-type: none"> • RES-SA6.8 Ridge Rowans, 25 Whetstone Lane, West Kirby

<p>consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<ul style="list-style-type: none"> • RES-SA3.7 4 Dingle Road, Tranmere • RES-SA6.11 7 Caldby Road, West Kirby • MPA-RA4.2 Charing Cross Quarter • RA4 Birkenhead Regeneration Framework Area • RA4 Central Birkenhead Regeneration Area <p>We suggest that this is referenced in the site-specific policies for the respective sites.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the</p>	

<p>hearing session(s), please outline why you consider this to be necessary:</p>	
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	

LPSD-1012

Comment ID	LPSD-1012
Person ID	1324015
Include files	LPSD-985,991-993, 995, 1002, 1011-1014, 1026, 1030, 1031, 1075-1080,1100-1143,1150-1174, 1425-EM-Leyssens Attach 2 of 9 2507_Redacted.pdf
Consultee Name	Mr Andrew Leyssens
Position	
Company / Organisation	United Utilities
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WP 6.3
Title	Residential Sites
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	RES-SA6.11

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer to attachment. Groundwater Source Protection Zones The Environment Agency has defined Groundwater Source Protection Zones (SPZs) for groundwater sources, which are often used for public drinking water supply purposes. The prevention of pollution to drinking water supplies is critical. The SPZs signify where there may be a particular risk from activities on or below the land surface. Such activities include construction. The details of SPZs can be viewed on the website of the Environment Agency.

	<p>We wish to highlight that new development sites are more appropriately located away from locations which are identified as sensitive groundwater protection areas especially within and adjacent to Groundwater Source Protection Zone 1 (SPZ1) which is closest to the water abstraction point and the most sensitive. This is of relevance given the presence of SPZs in the Wirral.</p> <p>We welcome the inclusion of wording for the protection of the drinking water supply in Policy WD14 (E).</p>
<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you</p>	<p>Whilst no allocations are identified in SPZ1, the following sites are identified to be within SPZ2.</p> <ul style="list-style-type: none"> RES-SA6.8 Ridge Rowans, 25 Whetstone Lane, West Kirby

<p>consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<ul style="list-style-type: none"> • RES-SA3.7 4 Dingle Road, Tranmere • RES-SA6.11 7 Caldys Road, West Kirby • MPA-RA4.2 Charing Cross Quarter • RA4 Birkenhead Regeneration Framework Area • RA4 Central Birkenhead Regeneration Area <p>We suggest that this is referenced in the site-specific policies for the respective sites.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the</p>	

hearing session(s), please outline why you consider this to be necessary:	
<p>Notification of Next Stages in Wirral's Local Plan</p> <p>Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	

LPSP-1013

Comment ID	LPSP-1013
Person ID	1324015
Include files	LPSP-985,991-993, 995, 1002, 1011-1014, 1026, 1030, 1031, 1075-1080,1100-1143,1150-1174, 1425-EM-Leyssens Attach 2 of 9 2507_Redacted.pdf
Consultee Name	Mr Andrew Leyssens
Position	
Company / Organisation	United Utilities
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy RA 4
Title	Central Birkenhead Regeneration Area
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	MPA-RA4.2

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer to attachment. Groundwater Source Protection Zones The Environment Agency has defined Groundwater Source Protection Zones (SPZs) for groundwater sources, which are often used for public drinking water supply purposes. The prevention of pollution to drinking water supplies is critical. The SPZs signify where there may be a particular risk from activities on or below the land surface. Such activities include construction. The details of SPZs can be viewed on the website of the Environment Agency.

	<p>We wish to highlight that new development sites are more appropriately located away from locations which are identified as sensitive groundwater protection areas especially within and adjacent to Groundwater Source Protection Zone 1 (SPZ1) which is closest to the water abstraction point and the most sensitive. This is of relevance given the presence of SPZs in the Wirral.</p> <p>We welcome the inclusion of wording for the protection of the drinking water supply in Policy WD14 (E).</p>
<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you</p>	<p>Whilst no allocations are identified in SPZ1, the following sites are identified to be within SPZ2.</p> <ul style="list-style-type: none"> RES-SA6.8 Ridge Rowans, 25 Whetstone Lane, West Kirby

<p>consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<ul style="list-style-type: none"> • RES-SA3.7 4 Dingle Road, Tranmere • RES-SA6.11 7 Caldby Road, West Kirby • MPA-RA4.2 Charing Cross Quarter • RA4 Birkenhead Regeneration Framework Area • RA4 Central Birkenhead Regeneration Area <p>We suggest that this is referenced in the site-specific policies for the respective sites.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the</p>	

<p>hearing session(s), please outline why you consider this to be necessary:</p>	
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	

Comment ID	LPSD-1014
Person ID	1324015
Include files	LPSD-1014-EM-Leyssens Attach 2 of 9 2507_Redacted .pdf LPSD-985,991-993, 995, 1002, 1011-1014, 1026, 1030, 1031, 1075-1080,1100-1143,1150-1174, 1425-EM-Leyssens Attach 2 of 9 2507_Redacted.pdf
Consultee Name	Mr Andrew Leyssens
Position	
Company / Organisation	United Utilities
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy RA 4
Title	Central Birkenhead Regeneration Area
To which part of the Local Plan does this representation relate?	Policy
* Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	RA4
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is	Please refer to attachment. Groundwater Source Protection Zones

<p>unsound. Please be as precise as possible.</p>	<p>The Environment Agency has defined Groundwater Source Protection Zones (SPZs) for groundwater sources, which are often used for public drinking water supply purposes. The prevention of pollution to drinking water supplies is critical. The SPZs signify where there may be a particular risk from activities on or below the land surface. Such activities include construction. The details of SPZs can be viewed on the website of the Environment Agency.</p> <p>We wish to highlight that new development sites are more appropriately located away from locations which are identified as sensitive groundwater protection areas especially within and adjacent to Groundwater Source Protection Zone 1 (SPZ1) which is closest to the water abstraction point and the most sensitive. This is of relevance given the presence of SPZs in the Wirral.</p> <p>We welcome the inclusion of wording for the protection of the drinking water supply in Policy WD14 (E).</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations</p>	

<p>Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Whilst no allocations are identified in SPZ1, the following sites are identified to be within SPZ2.</p> <ul style="list-style-type: none"> • RES-SA6.8 Ridge Rowans, 25 Whetstone Lane, West Kirby • RES-SA3.7 4 Dingle Road, Tranmere • RES-SA6.11 7 Caldys Road, West Kirby • MPA-RA4.2 Charing Cross Quarter • RA4 Birkenhead Regeneration Framework Area • RA4 Central Birkenhead Regeneration Area <p>We suggest that this is referenced in the site-specific policies for the respective sites.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in</p>	

hearing session(s)	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	

Comment ID	LPSD-1015
Person ID	1324088
Include files	LPSD-716, 998-1001, 1003-1010, 1015-1019, 1021-1025, 1027-1029-EM-Dickson Attachment 2507_Redacted.pdf
Consultee Name	Mr Mike Horner
Position	
Company / Organisation	Wirral Growth Company
Agent ID	1324087
Agent Name	Mr Greg Dickson
Position	
Company / Organisation	Barton Willmore (Stantec)
Number	Policy WS 5.4
Title	Ecological Networks
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 5.4
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment Policy WS 5.3 (error should read WS 5.4) requires an increase of a minimum 10% biodiversity net gain, whilst mitigation other impact of the development. As this is due to be enacted in law within the next couple of years, we consider this requirement to be acceptable. However, there should be a clause that allows net gain to provided off-site (where it is not feasible to deliver this on site).

as precise as possible.	
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	Include a clause that allows net gain to provided off-site (where it is not feasible to deliver this on site).

Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

- * No, I do not wish to participate in hearing session(s)
- * Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why

Yes, I wish to participate in hearing session(s)

<p>you consider this to be necessary:</p>	
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	

Comment ID	LPSD-1016
Person ID	1324088
Include files	LPSD-716, 998-1001, 1003-1010, 1015-1019, 1021-1025, 1027-1029-EM-Dickson Attachment 2507_Redacted.pdf
Consultee Name	Mr Mike Horner
Position	
Company / Organisation	Wirral Growth Company
Agent ID	1324087
Agent Name	Mr Greg Dickson
Position	
Company / Organisation	Barton Willmore (Stantec)
Number	Policy WS 7.1
Title	Design Principles
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 7.1
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment WGC note that Policy WS 7.1 repeats many of the requirements set out in Policy WS 6.1 Place Making. To avoid repetition, it is suggested that the points of duplication are either removed or incorporated into a single policy.

as precise as possible.	
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	Remove points of duplication between WS 7.1 and WS 6.1 or incorporate these into a single policy.

Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

- * No, I do not wish to participate in hearing session(s)
- * Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why

Yes, I wish to participate in hearing session(s)

<p>you consider this to be necessary:</p>	
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	

Comment ID	LPSD-1017
Person ID	1324088
Include files	LPSD-716, 998-1001, 1003-1010, 1015-1019, 1021-1025, 1027-1029-EM-Dickson Attachment 2507_Redacted.pdf
Consultee Name	Mr Mike Horner
Position	
Company / Organisation	Wirral Growth Company
Agent ID	1324087
Agent Name	Mr Greg Dickson
Position	
Company / Organisation	Barton Willmore (Stantec)
Number	Policy WS 8.2
Title	Sustainable Construction – Energy Efficiency, Overheating and Cooling, and Water Usage
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 8.2
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment "WGC is supportive of the Council's aspirations for sustainable construction and taking measures to address potential climate change implications. WGC has demonstrated its commitment to reducing emissions associated with the construction and operation of the new office buildings in Birkenhead. Here the scheme will be anchored by a highly sustainable BREEAM 'Excellent' office building. Notwithstanding this, WGC is concerned that Passivhaus standards will be difficult to deliver on brownfield sites in the early years of the plan period. It is, therefore,

as precise as possible.	recommended that this be tested as needs as part of the Local Plan viability assessment process. Set against this context, the inclusion of the phrase 'wherever feasible' (or similar) is supported to provide a degree of flexibility (especially where evidence is presented to justify the position on a site-by-site basis)."
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	Test Passivhaus standards as part of the Local Plan viability assessment.

Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

- * No, I do not wish to participate in hearing session(s)
- * Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why

Yes, I wish to participate in hearing session(s)

<p>you consider this to be necessary:</p>	
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	

LPSP-1018

Comment ID	LPSP-1018
Person ID	1324088
Include files	LPSP-716, 998-1001, 1003-1010, 1015-1019, 1021-1025, 1027-1029-EM-Dickson Attachment 2507_Redacted.pdf
Consultee Name	Mr Mike Horner
Position	
Company / Organisation	Wirral Growth Company
Agent ID	1324087
Agent Name	Mr Greg Dickson
Position	
Company / Organisation	Barton Willmore (Stantec)
Number	Policy WS 8.5
Title	Carbon Compensation through Renewable and Low Carbon Energy
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 8.5
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment WGC supports the Council's commitment to the delivery of net zero carbon development and to achieving this on site or addressed with renewable energy sources off site. It is suggested that the policy should ensure consistency with the requests of building requirements and also include clauses to ensure renewable and low carbon infrastructure requirements are not unduly onerous nor overtly affect the viability of the development in cooler market areas of the Borough.

as precise as possible.	
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	The policy should be consistent with building requirements and include clauses to ensure renewable and low carbon infrastructure requirements are not unduly onerous nor overtly affect the viability of the development in cooler market areas of the Borough.

Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

- * No, I do not wish to participate in hearing session(s)
- * Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why

Yes, I wish to participate in hearing session(s)

<p>you consider this to be necessary:</p>	
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	

Comment ID	LPSD-1019
Person ID	1324088
Include files	LPSD-716, 998-1001, 1003-1010, 1015-1019, 1021-1025, 1027-1029-EM-Dickson Attachment 2507_Redacted.pdf
Consultee Name	Mr Mike Horner
Position	
Company / Organisation	Wirral Growth Company
Agent ID	1324087
Agent Name	Mr Greg Dickson
Position	
Company / Organisation	Barton Willmore (Stantec)
Number	Policy WS 10.6
Title	Open Space
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 10.6
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachments The exceptions to developing on existing open spaces, sports and recreational buildings appear to be inconsistent with paragraph 99 of the NPPF (2021). This states that existing open space, sports and recreational buildings and land should not be permitted unless it is surplus to requirements, or it would be replaced by equivalent or better provision, or the development is for alternative sport and recreation provision, the benefits of which clearly outweigh the loss of the current or former use. It is, therefore, requested that the terms of Policy WS 10.6 should be revisited/updated accordingly.

as precise as possible.	
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	Update the terms of Policy WS 10.6 with paragraph 99 of the NPPF.

Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

- * No, I do not wish to participate in hearing session(s)
- * Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why

Yes, I wish to participate in hearing session(s)

<p>you consider this to be necessary:</p>	
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	

LPSP-1021

Comment ID	LPSP-1021
Person ID	1324088
Include files	LPSP-716, 998-1001, 1003-1010, 1015-1019, 1021-1025, 1027-1029-EM-Dickson Attachment 2507_Redacted.pdf
Consultee Name	Mr Mike Horner
Position	
Company / Organisation	Wirral Growth Company
Agent ID	1324087
Agent Name	Mr Greg Dickson
Position	
Company / Organisation	Barton Willmore (Stantec)
Number	Policy WS 11.1
Title	Meeting the Strategy
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 11.1
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment. "WGC support as a priority the safeguarding and enhancement of Moreton Town Centre as the main retail and service centre for the Area – including the southern area of the Priority Site at Pasture Road as part of the Town Centre boundary (to maintain Moreton's vitality and viability as community hub that provides a range of retail, recreational, cultural and community uses). Notwithstanding the support for WS 11.2, a key area of concern for WGC remains the reference to capacity for a 'convenience store' in Moreton (Settlement Area 5). This leads

<p>as precise as possible.</p>	<p>from the 2021 Retail and Centres Study which states at Para 2.1.5 that (in Moreton) capacity has reduced slightly since 2019 at an average of 100sq m at each reporting year. As such, the 2021 Retail and Centres Study identifies circa 500sqm of floorspace capacity in 2024 and 2029, rising to 600sqm in 2034. This is assessed to be sufficient to support a small format convenience store. This does not align with the size of store (1346sqm – internal floor/sales area) that has been proposed by WGC and Lidl GmbH ('Lidl') as part of the Stage 1 (2021) and Stage 2 (2022) consultation on the masterplan for the land at Pasture Road.</p> <p>Set against the evidence that has been presented by WGC through the Stage 1 and 2 consultations over the past 2 years, it is requested that the convenience floorspace capacity in Moreton to be increased to reflect the size of the forthcoming planning application and also identified for a 'convenience and/or discount food store operator'.</p> <p>In addition to the above, Policy WS11.1 is considered to be a generic in its approach and does not provide a local strategy for meeting the identified future retail and leisure needs and aspirations across the Borough. In accordance with part d) of paragraph 86 of the NPPF, it is suggested that Policy WS 11.1 should allocate sites to meet the scale and type of development like ly to be needed. This includes the proposed Lidl site at Pasture Road, Moreton for discount convenience retail. "</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the</p>	

<p>accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Increase the convenience floorspace capacity in Moreton to reflect the size of the forthcoming planning application and also identified for a 'convenience and/or discount food store operator'. Policy WS 11.1 should allocate sites to meet the scale and type of development likely to be needed, including the proposed Lidl site at Pasture Road, Moreton for discount convenience retail.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? * No, I do not wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	

Comment ID	LPSD-1022
Person ID	1324088
Include files	LPSD-716, 998-1001, 1003-1010, 1015-1019, 1021-1025, 1027-1029-EM-Dickson Attachment 2507_Redacted.pdf
Consultee Name	Mr Mike Horner
Position	
Company / Organisation	Wirral Growth Company
Agent ID	1324087
Agent Name	Mr Greg Dickson
Position	
Company / Organisation	Barton Willmore (Stantec)
Number	Policy WS 11.2
Title	Hierarchy of Retail Centres
To which part of the Local Plan does this representation relate?	Policy
<ul style="list-style-type: none"> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment 	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 11.2
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment. In response to Policy WS 11.2, WGC supports Birkenhead being identified as 'sub regional centre' and the focus for retail, office, leisure, service, arts, culture, tourism, community facilities and other main town centre uses. However, the WGC masterplan and the proposals for Birkenhead market will be essential to improving the vitality and viability of the town centre and we would propose that these are specifically referenced in part B of the policy given their importance to the regeneration of the sub-regional centre. In addition, WGC is fully supportive of Moreton being identified as town centre and focus for investment in new retail and community facilities.

as precise as possible.	
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	Reference WGC masterplan and the proposals for Birkenhead market in part B of the policy.

Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

- * No, I do not wish to participate in hearing session(s)
- * Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why

Yes, I wish to participate in hearing session(s)

<p>you consider this to be necessary:</p>	
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	

LPSD-1023

Comment ID	LPSD-1023
Person ID	1324088
Include files	LPSD-716, 998-1001, 1003-1010, 1015-1019, 1021-1025, 1027-1029-EM-Dickson Attachment 2507_Redacted.pdf
Consultee Name	Mr Mike Horner
Position	
Company / Organisation	Wirral Growth Company
Agent ID	1324087
Agent Name	Mr Greg Dickson
Position	
Company / Organisation	Barton Willmore (Stantec)
Number	Policy WS 11.3
Title	Town and Local Centre Impact Assessments
To which part of the Local Plan does this representation relate?	Policy
<ul style="list-style-type: none"> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment 	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 11.3
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment Having reviewed the proposed terms of draft Policy WS 11.3, it is requested that the thresholds for impact assessments are expressed using different levels for different use class to ensure that there can be no significant adverse impact upon the ambition for regeneration across the neighbourhoods of Birkenhead town centre.

as precise as possible.	
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	Express the thresholds for impact assessments using different levels for different use class.

Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

- * No, I do not wish to participate in hearing session(s)
- * Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why

Yes, I wish to participate in hearing session(s)

<p>you consider this to be necessary:</p>	
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	

Comment ID	LPSD-1024
Person ID	1324088
Include files	LPSD-716, 998-1001, 1003-1010, 1015-1019, 1021-1025, 1027-1029-EM-Dickson Attachment 2507_Redacted.pdf
Consultee Name	Mr Mike Horner
Position	
Company / Organisation	Wirral Growth Company
Agent ID	1324087
Agent Name	Mr Greg Dickson
Position	
Company / Organisation	Barton Willmore (Stantec)
Number	Policy RA 4
Title	Central Birkenhead Regeneration Area
To which part of the Local Plan does this representation relate?	Policy
<ul style="list-style-type: none"> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment 	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	RA 4
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment WGC is fully supportive of the development of a new commercial office quarter and residential led mixed-use neighbourhood in Central Birkenhead. It is, however, suggested that the policy should specifically reference the types of uses that will be supported in this location to link with the settlement area priorities.

as precise as possible.	
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	The Policy should reference the types of uses that will be supported in Central Birkenhead to link with the settlement area priorities.

Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

- * No, I do not wish to participate in hearing session(s)
- * Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why

Yes, I wish to participate in hearing session(s)

you consider this to be necessary:	
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	

Comment ID	LPSD-1025
Person ID	1324088
Include files	LPSD-716, 998-1001, 1003-1010, 1015-1019, 1021-1025, 1027-1029-EM-Dickson Attachment 2507_Redacted.pdf
Consultee Name	Mr Mike Horner
Position	
Company / Organisation	Wirral Growth Company
Agent ID	1324087
Agent Name	Mr Greg Dickson
Position	
Company / Organisation	Barton Willmore (Stantec)
Number	Policy WP 2
Title	Policy for the Birkenhead Commercial Core
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WP 2
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	Please refer to attachment WGC supports the reconfiguration and re-establishment of Central Birkenhead as the main retail, office and service centre for the Borough including services for leisure, entertainment, culture, health and education and other uses of Borough wide significance.
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be	

as precise as possible.	
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	

Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

- * No, I do not wish to participate in hearing session(s)
- * Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why

Yes, I wish to participate in hearing session(s)

you consider this to be necessary:	
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	

LPSD-1026

Comment ID	LPSD-1026
Person ID	1324015
Include files	LPSD-985,991-993, 995, 1002, 1011-1014, 1026, 1030, 1031, 1075-1080,1100-1143,1150-1174, 1425-EM-Leyssens Attach 2 of 9 2507_Redacted.pdf LPSD-993,1026,1030,1031,1075,1076,1425-EM-Leyssens Attach 5 of 9 2507_Redacted.pdf LPSD-993,1026,1030,1031,1075,1076,1425-EM-Leyssens Attach 8 of 9 2507_Redacted.pdf LPSD-993,1026,1030,1031,1075,1076,1425-EM-Leyssens Attach 7 of 9 2507_Redacted.pdf LPSD-993,1026,1030,1031,1075,1076,1425-EM-Leyssens Attach 4 of 9 2507_Redacted.pdf LPSD-993,1026,1030,1031,1075,1076,1425-EM-Leyssens Attach 6 of 9 2507_Redacted.pdf LPSD-993,1026,1030,1031,1075,1076,1425-EM-Leyssens Attach 9 of 9 2507_Redacted.pdf LPSD-993,1026,1030,1031,1075,1076,1425-EM-Leyssens Attach 3 of 9 2507_Redacted.pdf LPSD-993,1026,1030,1031,1075,1076,1425-EM-Leyssens Attach 1 of 9 2507_Redacted.pdf
Consultee Name	Mr Andrew Leyssens
Position	
Company / Organisation	United Utilities
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy RA 3
Title	Birkenhead Waterfront Regeneration Area
To which part of the Local Plan does this representation relate?	Site
* Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	
Please state which paragraph number(s) this representation relates to.	

Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	EMP-RA3.1
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective	

<p>* Not Consistent with National Policy</p>	
<p>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</p>	<p>United Utilities has a number of wastewater treatment works in Wirral. We have enclosed site plans for the some of our wastewater treatment works / pumping stations in the borough as follows.</p> <p>Land East of Birkenhead Road, Seacombe (Wallasey Wastewater Treatment Works)</p> <p>Bromborough Wastewater Treatment Works</p> <p>Greenbank Road Pumping Station</p> <p>Meols Wastewater Treatment Works</p> <p>Moreton Wastewater pumping station</p> <p>Upton Wastewater Treatment Works</p> <p>Birkenhead Wastewater Treatment Works</p> <p>Barnston Storm Tanks</p>
<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation,</p>	

<p>relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>United Utilities wishes to emphasise its strong preference to avoid development in the vicinity of our works.</p> <p>We wish to note that the following allocations are within proximity to our wastewater treatment / pumping stations as such we would like to discuss with you further the need for assessments relating to, inter alia, odour and noise as a result of the proximity to these wastewater assets. It may be necessary to reflect the need for these assessments in site-specific policy and to inform the preparation of masterplans.</p> <ul style="list-style-type: none"> • Morpeth Waterfront, Birkenhead Employment Allocation; • Woodside and A41 Gyratory Masterplan Area; • Morpeth Dock Mixed Use Area; • Hamilton Square Mixed Use Area; • Birkenhead Waterfront Regeneration Area; • Birkenhead Regeneration Framework Area; • and Central Birkenhead Regeneration Area.
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p>	

<p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	

Comment ID	LPSD-1027
Person ID	1324088
Include files	LPSD-716, 998-1001, 1003-1010, 1015-1019, 1021-1025, 1027-1029-EM-Dickson Attachment 2507_Redacted.pdf
Consultee Name	Mr Mike Horner
Position	
Company / Organisation	Wirral Growth Company
Agent ID	1324087
Agent Name	Mr Greg Dickson
Position	
Company / Organisation	Barton Willmore (Stantec)
Number	Policy WP 5
Title	Policy for Leasowe, Moreton, Upton, Greasby and Woodchurch
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WP 5
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment "WGC support as a priority the safeguarding and enhancement of Moreton Town Centre as the main retail and service centre for the Area - including the reconfiguration of the area to the north of the centre at Pasture Road and through the allocation of land for new residential development (i.e. RES-SA5.1, RES-SA5.2 and RES-SA5.7). Notwithstanding the overarching support, the the town and local centre strategy needs to acknowledge the need for discount convenience retail in Moreton and identify the WGC Priority Site at Pasture Road as being the

<p>as precise as possible.</p>	<p>site that can meet this need in accordance with Figure 5.6 of the Local Plan and paragraph 86 of the NPPF. In addition to the points raised in relation to the health and viability of Moreton as a retail centre, WGC considers that as the Priority Site at Pasture Road (Local Plan site ref. RES-SA5.1, RES-SA5.2 and RES-SA5.7) is proposed to be delivered under the terms of a comprehensive masterplan, it would be more logical to include these sites as a single allocation.</p> <ul style="list-style-type: none"> • RES-SA5.1 Moreton Family Centre, Pasture Road – The approximate capacity is stated as being 75 units and to be delivered in the period up to 2023/24. However, based on WGC's latest masterplan, the site is expected to be developed for an 80-bed extra care facility and, provided outline planning permission is granted later this year, we would expect the appointed developer to start delivering units in 2024/25. It is requested that both figures should be updated accordingly. • RES-SA5.2 Moreton Municipal, Knutsford Road – The approximate capacity is stated as being 8 units. The latest masterplan shows that this site is expected to accommodate 6 dwellings and given planning permission is yet to be granted and development partner is yet to be appointed this site is unlikely to deliver until 2024 at the earliest. • RES-SA5.7 Land at Pasture Road, Moreton – WGC agrees with the proposed capacity of 36 dwellings (as this aligns with the WGC masterplan) and the anticipated timescales for delivery (i.e. 2024/25)."
<p>omplies with the Duty to co-operate * Yes * No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the</p>	

<p>accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>The town and local centre strategy needs to acknowledge the need for discount convenience retail in Moreton and identify the WGC Priority Site at Pasture Road as being the site that can meet this need in accordance with Figure 5.6 of the Local Plan and paragraph 86 of the NPPF.</p> <p>Include sites RES-SA5.1, RES-SA5.2 and RES-SA5.7 as a single allocation.</p> <p>Update the figures for RES-SA5.1 Moreton Family Centre, Pasture Road to state that it will deliver an 80-bed extra care facility beginning in 2024/25. The capacity of RES-SA5.2 Moreton Municipal, Knutsford Road should be 6 dwellings and delivery is unlikely to occur until 2024.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? * No, I do not wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	

LPSP-1028

Comment ID	LPSP-1028
Person ID	1324088
Include files	LPSP-716, 998-1001, 1003-1010, 1015-1019, 1021-1025, 1027-1029-EM-Dickson Attachment 2507_Redacted.pdf
Consultee Name	Mr Mike Horner
Position	
Company / Organisation	Wirral Growth Company
Agent ID	1324087
Agent Name	Mr Greg Dickson
Position	
Company / Organisation	Barton Willmore (Stantec)
Number	Policy WP 5.3
Title	Town Centre Proposals
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WP 5.3
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment Policy WP 5.3 states the northern edge of Moreton Town Centre will be reconfigured along Pasture Road, where alternative uses including new residential development will be encouraged. To make the policy more accurate/specific, it is suggested that Policy WP 5.3 is updated to refer to specific uses to be applied for under the terms of the forthcoming hybrid planning application.

as precise as possible.	
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	Policy WP 5.3 is updated to refer to specific uses to be applied for under the terms of the forthcoming hybrid planning application.

Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

- * No, I do not wish to participate in hearing session(s)
- * Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why

Yes, I wish to participate in hearing session(s)

you consider this to be necessary:	
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	

LPSP-1029

Comment ID	LPSP-1029
Person ID	1324088
Include files	LPSP-716, 998-1001, 1003-1010, 1015-1019, 1021-1025, 1027-1029-EM-Dickson Attachment 2507_Redacted.pdf
Consultee Name	Mr Mike Horner
Position	
Company / Organisation	Wirral Growth Company
Agent ID	1324087
Agent Name	Mr Greg Dickson
Position	
Company / Organisation	Barton Willmore (Stantec)
Number	Policy WD 1.2
Title	Trees
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WD 1.2
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment Where development involves the loss of trees, Policy WD 1.2 requires replacement tree planting elsewhere on site in accordance with the proposed replacement tree ratio. This is supported in principle. However, replacing trees on site is not always possible due to site constraints, therefore, there should be an allowance for offsite provision to be provided if required.

as precise as possible.	
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	Allow offsite provision of trees if required.

Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

- * No, I do not wish to participate in hearing session(s)
- * Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why

Yes, I wish to participate in hearing session(s)

you consider this to be necessary:	
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	

LPSD-1030

Comment ID	LPSD-1030
Person ID	1324015
Include files	LPSD-985,991-993, 995, 1002, 1011-1014, 1026, 1030, 1031, 1075-1080,1100-1143,1150-1174, 1425-EM-Leyssens Attach 2 of 9 2507_Redacted.pdf LPSD-993,1026,1030,1031,1075,1076,1425-EM-Leyssens Attach 1 of 9 2507_Redacted.pdf LPSD-993,1026,1030,1031,1075,1076,1425-EM-Leyssens Attach 3 of 9 2507_Redacted.pdf LPSD-993,1026,1030,1031,1075,1076,1425-EM-Leyssens Attach 9 of 9 2507_Redacted.pdf LPSD-993,1026,1030,1031,1075,1076,1425-EM-Leyssens Attach 6 of 9 2507_Redacted.pdf LPSD-993,1026,1030,1031,1075,1076,1425-EM-Leyssens Attach 4 of 9 2507_Redacted.pdf LPSD-993,1026,1030,1031,1075,1076,1425-EM-Leyssens Attach 7 of 9 2507_Redacted.pdf LPSD-993,1026,1030,1031,1075,1076,1425-EM-Leyssens Attach 8 of 9 2507_Redacted.pdf LPSD-993,1026,1030,1031,1075,1076,1425-EM-Leyssens Attach 5 of 9 2507_Redacted.pdf
Consultee Name	Mr Andrew Leyssens
Position	
Company / Organisation	United Utilities
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy RA 3
Title	Birkenhead Waterfront Regeneration Area
To which part of the Local Plan does this representation relate?	Site
* Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	
Please state which paragraph number(s) this representation relates to.	

Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	MPA-RA3.1
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective	

<p>* Not Consistent with National Policy</p>	
<p>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</p>	<p>United Utilities has a number of wastewater treatment works in Wirral. We have enclosed site plans for the some of our wastewater treatment works / pumping stations in the borough as follows.</p> <p>Land East of Birkenhead Road, Seacombe (Wallasey Wastewater Treatment Works)</p> <p>Bromborough Wastewater Treatment Works</p> <p>Greenbank Road Pumping Station</p> <p>Meols Wastewater Treatment Works</p> <p>Moreton Wastewater pumping station</p> <p>Upton Wastewater Treatment Works</p> <p>Birkenhead Wastewater Treatment Works</p> <p>Barnston Storm Tanks</p>
<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation,</p>	

<p>relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>United Utilities wishes to emphasise its strong preference to avoid development in the vicinity of our works.</p> <p>We wish to note that the following allocations are within proximity to our wastewater treatment / pumping stations as such we would like to discuss with you further the need for assessments relating to, inter alia, odour and noise as a result of the proximity to these wastewater assets. It may be necessary to reflect the need for these assessments in site-specific policy and to inform the preparation of masterplans.</p> <ul style="list-style-type: none"> • Morpeth Waterfront, Birkenhead Employment Allocation; • Woodside and A41 Gyratory Masterplan Area; • Morpeth Dock Mixed Use Area; • Hamilton Square Mixed Use Area; • Birkenhead Waterfront Regeneration Area; • Birkenhead Regeneration Framework Area; • and Central Birkenhead Regeneration Area.
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p>	

<p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	

LPSD-1031

Comment ID	LPSD-1031
Person ID	1324015
Include files	LPSD-993,1026,1030,1031,1075,1076,1425-EM-Leyssens Attach 7 of 9 2507_Redacted.pdf LPSD-993,1026,1030,1031,1075,1076,1425-EM-Leyssens Attach 8 of 9 2507_Redacted.pdf LPSD-993,1026,1030,1031,1075,1076,1425-EM-Leyssens Attach 4 of 9 2507_Redacted.pdf LPSD-993,1026,1030,1031,1075,1076,1425-EM-Leyssens Attach 6 of 9 2507_Redacted.pdf LPSD-993,1026,1030,1031,1075,1076,1425-EM-Leyssens Attach 3 of 9 2507_Redacted.pdf LPSD-993,1026,1030,1031,1075,1076,1425-EM-Leyssens Attach 9 of 9 2507_Redacted.pdf LPSD-993,1026,1030,1031,1075,1076,1425-EM-Leyssens Attach 1 of 9 2507_Redacted.pdf LPSD-993,1026,1030,1031,1075,1076,1425-EM-Leyssens Attach 5 of 9 2507_Redacted.pdf LPSD-985,991-993, 995, 1002, 1011-1014, 1026, 1030, 1031, 1075-1080,1100-1143,1150-1174, 1425-EM-Leyssens Attach 2 of 9 2507_Redacted.pdf
Consultee Name	Mr Andrew Leyssens
Position	
Company / Organisation	United Utilities
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy RA 3
Title	Birkenhead Waterfront Regeneration Area
To which part of the Local Plan does this representation relate?	Site
* Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	
Please state which paragraph number(s) this representation relates to.	

Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	MUA-RA3.1
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective	

<p>* Not Consistent with National Policy</p>	
<p>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</p>	<p>United Utilities has a number of wastewater treatment works in Wirral. We have enclosed site plans for the some of our wastewater treatment works / pumping stations in the borough as follows.</p> <p>Land East of Birkenhead Road, Seacombe (Wallasey Wastewater Treatment Works)</p> <p>Bromborough Wastewater Treatment Works</p> <p>Greenbank Road Pumping Station</p> <p>Meols Wastewater Treatment Works</p> <p>Moreton Wastewater pumping station</p> <p>Upton Wastewater Treatment Works</p> <p>Birkenhead Wastewater Treatment Works</p> <p>Barnston Storm Tanks</p>
<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation,</p>	

<p>relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>United Utilities wishes to emphasise its strong preference to avoid development in the vicinity of our works.</p> <p>We wish to note that the following allocations are within proximity to our wastewater treatment / pumping stations as such we would like to discuss with you further the need for assessments relating to, inter alia, odour and noise as a result of the proximity to these wastewater assets. It may be necessary to reflect the need for these assessments in site-specific policy and to inform the preparation of masterplans.</p> <ul style="list-style-type: none"> • Morpeth Waterfront, Birkenhead Employment Allocation; • Woodside and A41 Gyratory Masterplan Area; • Morpeth Dock Mixed Use Area; • Hamilton Square Mixed Use Area; • Birkenhead Waterfront Regeneration Area; • Birkenhead Regeneration Framework Area; • and Central Birkenhead Regeneration Area.
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p>	

<p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	

Comment ID	LPSD-1033
Person ID	1248823
Include files	LPSD-406, 986-990-EM-Storey Attach 3 of 8 2207_Redacted.pdf
Consultee Name	Mr Ian Mellor
Position	
Company / Organisation	North Point One LLP
Agent ID	1248751
Agent Name	Mr Jonathan Storey
Position	Senior Planner
Company / Organisation	Pegasus Group
Number	Policy WS 3.5
Title	Self-Build and Custom Build Housing
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS3.5
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachmenThis policy states that the Council will work with developers on sites of more than 50 dwellings to secure the delivery of serviced plots for custom or self-build dwellings. We would be keen to understand the evidence to support the need for custom and self-build housing in Wirral, and how it has informed the requirements of Policy WS3.5. PPG sets out how custom and self-build housing needs can be assessed. The SHMA(October 2021) states that during the period March 2016 to November 2018 there were 186 households on the Self-build Register, with the Hoylake / West Kirby, Heswall, mid-Wirral and the rural being mentioned most frequently as the preferred areas to live. The register and appears to be

as precise as possible.	<p>free and unrestricted in terms of registry and as such may overrepresent the true demand for self and custom build homes. We do not consider that the Council has appropriate evidence to support the requirement for developers on sites of more than 50 dwellings to provide service plots for custom or self-build housing. We are concerned that as currently proposed this policy will not assist in boosting the supply of housing and may even limit the deliverability of some sites and homes. It is also not clear whether there is even a demand from custom and self-builders to live on sites within a larger residential development scheme</p>
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you	

consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

- * No, I do not wish to participate in hearing session(s)
- * Yes, I wish to participate in hearing session(s)

If you wish to participate in the

<p>hearing session(s), please outline why you consider this to be necessary:</p>	
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	

Comment ID	LPSD-1034
Person ID	1323877
Include files	LPSD-547,1034-1037 and 1405-1407-EM-Storey Attach 2 of 5 2507_Redacted.pdf
Consultee Name	Mr Alex Bowling
Position	
Company / Organisation	Bellway Homes Ltd
Agent ID	1248751
Agent Name	Mr Jonathan Storey
Position	Senior Planner
Company / Organisation	Pegasus Group
Number	Policy WP 7.2
Title	Residential Sites
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WP7.2
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment 2 The Council have not provided any evidence that this policy is positively prepared and that the homes planned in Settlement Area 7 will meet the objectively assessed needs of this Settlement Area including affordable housing needs over the plan period. To address this issue, the Council should provide evidence on how the identified supply of homes in SA7 will address these needs over the plan period. If found to be unsound, more sites would be required in the housing supply to address housing needs, including affordable housing needs which

as precise as possible.	could be delivered during the middle and latter end of the plan period. This is an exceptional circumstance to alter Green Belt boundaries in this area and identify sites which currently lie on the edge of the Settlement Area to boost the supply of homes.
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	If found to be unsound, more sites would be required in the housing supply to address housing needs, including affordable housing needs which could be delivered during the middle and latter end of the plan period. This is an exceptional circumstance to alter Green Belt boundaries in this area and identify sites which currently lie on the edge of the Settlement Area to boost the supply of homes.

Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

- * No, I do not wish to participate in hearing session(s)
- * Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why

<p>you consider this to be necessary:</p>	
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	

LPSP-1035

Comment ID	LPSP-1035
Person ID	1323877
Include files	LPSP-547,1034-1037 and 1405-1407-EM-Storey Attach 2 of 5 2507_Redacted.pdf
Consultee Name	Mr Alex Bowling
Position	
Company / Organisation	Bellway Homes Ltd
Agent ID	1248751
Agent Name	Mr Jonathan Storey
Position	Senior Planner
Company / Organisation	Pegasus Group
Number	Policy WS 3.2
Title	Housing Density
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.2
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	please refer to attachment 2 The Council have not provided any evidence to justify how the housing density requirements respond to the needs of the Borough and how this will deliver the quantum of larger family housing required.

as precise as possible.	If found to be unsound, further consideration would need to be given to new residential allocations that are viable and can deliver lower density schemes and provide for larger family housing and affordable housing.
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	If found to be unsound, further consideration would need to be given to new residential allocations that are viable and can deliver lower density schemes and provide for larger family housing and affordable housing.

Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

- * No, I do not wish to participate in hearing session(s)
- * Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why

you consider this to be necessary:	
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	

Comment ID	LPSD-1036
Person ID	1323877
Include files	LPSD-547,1034-1037 and 1405-1407-EM-Storey Attach 2 of 5 2507_Redacted.pdf
Consultee Name	Mr Alex Bowling
Position	
Company / Organisation	Bellway Homes Ltd
Agent ID	1248751
Agent Name	Mr Jonathan Storey
Position	Senior Planner
Company / Organisation	Pegasus Group
Number	Policy WS 3.4
Title	Housing Mix
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.4
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please see attachment 2 We recommend a flexible approach is taken regarding housing mix which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location. However, it is not clear from this policy how all new residential developments will be able to address the mix of housing particularly where this is a small site for example. It is also not clear how the needs for older people or specialist housing can be addressed on all sites or how it will be determined whether it is appropriate.

<p>as precise as possible.</p>	<p>6.29. This policy states that outside of regeneration areas a minimum of 70% of market dwellings will be developed for larger dwellings of three or more bedrooms, within the regeneration areas this should be a minimum of 30%.</p> <p>6.30. We consider that flexibility in this policy will be important, as there are some concerns how this policy will sit alongside other policy requirements such as the housing density requirements, which may be difficult to achieve with significant numbers of larger homes, and the optional housing standards which may lead to viability issues where significant numbers of 3-bed or more homes are provided</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	

<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>flexibility in policy</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	

<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	

LPSD-1037

Comment ID	LPSD-1037
Person ID	1323877
Include files	LPSD-547,1034-1037 and 1405-1407-EM-Storey Attach 2 of 5 2507_Redacted.pdf LPSD-547 & 1037-EM-Storey Attach 5 of 5 2507_Redacted.pdf LPSD-547 &1037-EM-Storey Attach 4 of 5 2507_Redacted.pdf LPSD-547 & 1037-EM-Storey Attach 1 of 5 2507_Redacted.pdf LPSD-547 & 1037-EM-Storey Attach 3 of 5 2507_Redacted.pdf
Consultee Name	Mr Alex Bowling
Position	
Company / Organisation	Bellway Homes Ltd
Agent ID	1248751
Agent Name	Mr Jonathan Storey
Position	Senior Planner
Company / Organisation	Pegasus Group
Number	Policy WS 1
Title	The Development and Regeneration Strategy for Wirral 2021 - 2037
To which part of the Local Plan does this representation relate?	Policy
* Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this	WS1

representation relates to.	
Please state which Site ID/Reference this representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy

<p>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</p>	<p>Please refer to attachments The Council have not provided any evidence to justify the limited housing growth planned in Settlement Area 7, and thus that the Development and Regeneration Strategy is not sound – the resulting claim that exceptional circumstances do not exist to alter the Green Belt boundaries has not been justified.</p> <p>If found to be unsound, further consideration would need to be given to housing growth needed within Settlement Area 7, to ensure the Development and Regeneration Strategy is sound. If more housing growth is required, this would be an exceptional circumstance JS 32 to amend the extent of the Settlement Area boundary to encompass land otherwise</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	

<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>if found to be unsound, further consideration would need to be given to housing growth needed within Settlement Area 7, to ensure the Development and Regeneration Strategy is sound. If more housing growth is required, this would be an exceptional circumstance to amend the extent of the Settlement Area boundary to encompass land otherwise within the Green Belt. specifically land at Boathouse Lane Gayton</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	

<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	

Comment ID	LPSD-1038
Person ID	1323898
Include files	LPSD-586, 966-973, 983 & 1038-1041-EM-Watson Form 6 of 29 2507_Redacted.pdf
Consultee Name	Mr Nigel McGurk
Position	
Company / Organisation	Leverhulme Estate
Agent ID	1323897
Agent Name	Mr Edward Watson
Position	
Company / Organisation	Strutt and Parker
Number	Policy RA 6
Title	Wirral Waters Regeneration Area
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this	RES RA6.1, RES RA6.2, RES RA6.3, RES RA 6.4, RES RA 6.5, RES RA6.6

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	<p>[Sites cannot provide adequate improvements to Green and Blue Infrastructure (WS5.1), their location in Port of Liverpool means general improvements or provision will be severely limited due to nature and location of land. These sites are economically unviable and undeliverable... the draft plan will not enhance Green and Blue Infrastructure on site... the sites will not be able to make off site contributions]</p> <p>[open space provision on the sites will be severely limited, , existing open space likely to be impacted negatively by increased use without the offset contributions which cannot provide for offsetting and mitigation or enhancement WS 5.2]</p>

as precise as possible.	[absence of adequate outdoor sport provision near sites (WS 5.3), wide range of viability and deliverability issues ...it is clear and obvious that the provision and success of outdoor sport provision for the majority of allocated sites is non existent.]
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	No comment
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	1 Given the flaws in the Council's evidence and plan-making approach, it is considered that the changes necessary to produce a sound Local Plan go beyond what could be considered 'Main Modifications'.

<p>Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s), please outline why</p>	<p>Leverhulme Estate considers that the Council's overall development strategy is fundamentally flawed and that this could have a detrimental effect on Leverhulme's landholdings for the next couple of decades. In this case, the proposed Nature Improvement Areas (NIAs) are of particular concern given our belief that these have not been identified on the basis of comprehensive and properly evidenced analysis. Therefore, as one of the principal rural landowners impacted by the draft policies and designations, Leverhulme wishes to be heard.</p>

you consider this to be necessary:	
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

Comment ID	LPSD-1039
Person ID	1323898
Include files	LPSD-586, 966-973, 983 & 1038-1041-EM-Watson Form 6 of 29 2507_Redacted.pdf
Consultee Name	Mr Nigel McGurk
Position	
Company / Organisation	Leverhulme Estate
Agent ID	1323897
Agent Name	Mr Edward Watson
Position	
Company / Organisation	Strutt and Parker
Number	Policy RA 2
Title	Scott's Quay Regeneration Area
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this	RES RA 2.1, RES RA 2.2

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	[Sites cannot provide adequate improvements to Green and Blue Infrastructure (WS5.1), their location in Port of Liverpool means general improvements or provision will be severely limited due to nature and location of land. These sites are economically unviable and undeliverable... the draft plan will not enhance Green and Blue Infrastructure on site... the sites will not be able to make off site contributions] [open space provision on the sites will be severely limited, , existing open space likely to be impacted negatively by increased use without the offset contributions which cannot provide for offsetting and mitigation or enhancement WS 5.2]

as precise as possible.	[absence of adequate outdoor sport provision near sites (WS 5.3), wide range of viability and deliverability issues ...it is clear and obvious that the provision and success of outdoor sport provision for the majority of allocated sites is non existent.]
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	No comment
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	For all of the above reasons, we do not believe the HRA / AA can be concluded favourably so as to allow the Local Plan to be adopted given Regulation 63 of the Habitat Regulations.
Please set out the modification(s) you consider necessary to make the Local	1 Given the flaws in the Council's evidence and plan-making approach, it is considered that the changes necessary to produce a sound Local Plan go beyond what could be considered 'Main Modifications'.

<p>Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s), please outline why</p>	<p>Leverhulme Estate considers that the Council's overall development strategy is fundamentally flawed and that this could have a detrimental effect on Leverhulme's landholdings for the next couple of decades. In this case, the proposed Nature Improvement Areas (NIAs) are of particular concern given our belief that these have not been identified on the basis of comprehensive and properly evidenced analysis. Therefore, as one of the principal rural landowners impacted by the draft policies and designations, Leverhulme wishes to be heard.</p>

you consider this to be necessary:	
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

LPSP-1040

Comment ID	LPSP-1040
Person ID	1323898
Include files	LPSP-586, 966-973, 983 & 1038-1041-EM-Watson Form 6 of 29 2507_Redacted.pdf
Consultee Name	Mr Nigel McGurk
Position	
Company / Organisation	Leverhulme Estate
Agent ID	1323897
Agent Name	Mr Edward Watson
Position	
Company / Organisation	Strutt and Parker
Number	Policy RA 5
Title	Hind Street and St Werburgh's Regeneration Area
To which part of the Local Plan does this representation relate?	Site
<ul style="list-style-type: none"> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment 	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this	RES RA 5.1

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	1.27 Policy WS5.3 seeks to effectively incorporate Outdoor Sports Provision with the identified needs for the borough, with housing allocations which are not able to provide Outdoor Sports provision required to make an appropriate financial contribution to improve existing facilities. Assessment

<p>as precise as possible.</p>	<p>1.28 The analysis discussed in paragraph 1.23 above also applies to the Outdoor Sports Provision, as a large proportion of the residential housing allocation will not be able to accommodate outdoor sports provision on site therefore the question remains where will the financial contributions come from in order to provide for the improvement of existing outdoor sports provisions? If and when the housing allocations are found to be unviable and to depend upon public subsidies even without consideration of outdoor sports provision (amongst many other things), it is evident that there is no evidence of suitable, adequate or appropriate financial contributions linked to offsite provision of outdoor sports provision.</p> <p>1.29 This is a fundamental issue, not least because there is an absence of adequate outdoor sports provisions near to the major residential developments RES-RA6.1-6.5, RES-RA2.1/2.2 Wirral Waters Area (approximately 3,900 dwellings), RES-RA5.1 Hind Street, Tranmere (1,400 dwellings) and only a cricket ground near to RES-SA4.7 Former D1 Oils, Dock Road South, Bromborough (1,225 dwellings). Each of these allocations will require significant outdoor sports provision and contributions. However, the wide range of viability and deliverability issues, including but not limited to lack of space on the various sites (similar to paragraph 1.22) and substantive evidence demonstrating an absence of commercial viability for development alone (excluding contributions to meet policy requirements), it is clear and obvious that the provision and success of outdoor sports provision for the majority of the allocated sites is non-existent.</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	<p>No comment</p>
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations</p>	

<p>Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>1 Given the flaws in the Council's evidence and plan-making approach, it is considered that the changes necessary to produce a sound Local Plan go beyond what could be considered 'Main Modifications'.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in</p>	<p>Yes, I wish to participate in hearing session(s)</p>

hearing session(s)	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>Leverhulme Estate considers that the Council's overall development strategy is fundamentally flawed and that this could have a detrimental effect on Leverhulme's landholdings for the next couple of decades. In this case, the proposed Nature Improvement Areas (NIAs) are of particular concern given our belief that these have not been identified on the basis of comprehensive and properly evidenced analysis. Therefore, as one of the principal rural landowners impacted by the draft policies and designations, Leverhulme wishes to be heard.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

LPSD-1041

Comment ID	LPSD-1041
Person ID	1323898
Include files	LPSD-586, 966-973, 983 & 1038-1041-EM-Watson Form 6 of 29 2507_Redacted.pdf LPSD-605, 1041, 1043 & 1044-EM-Watson Form 25 of 29 2507_Redacted.pdf
Consultee Name	Mr Nigel McGurk
Position	
Company / Organisation	Leverhulme Estate
Agent ID	1323897
Agent Name	Mr Edward Watson
Position	
Company / Organisation	Strutt and Parker
Number	Policy WP 4.2
Title	Residential Sites
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	

Please state which Site ID/Reference this representation relates to.	RES SA 4.2, RES SA4.7
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Consistent with National Policy
Please give details of why you consider the Local Plan is	1.26 WS5.3 Outdoor Sports Provision 1.27 Policy WS5.3 seeks to effectively incorporate Outdoor Sports Provision with the identified needs for the borough, with housing allocations which are not able to provide Outdoor Sports provision required to make an appropriate financial contribution to improve existing facilities.

<p>unsound. Please be as precise as possible.</p>	<p>Assessment</p> <p>1.28 The analysis discussed in paragraph 1.23 above also applies to the Outdoor Sports Provision, as a large proportion of the residential housing allocation will not be able to accommodate outdoor sports provision on site therefore the question remains where will the financial contributions come from in order to provide for the improvement of existing outdoor sports provisions? If and when the housing allocations are found to be unviable and to depend upon public subsidies even without consideration of outdoor sports provision (amongst many other things), it is evident that there is no evidence of suitable, adequate or appropriate financial contributions linked to offsite provision of outdoor sports provision.</p> <p>1.29 This is a fundamental issue, not least because there is an absence of adequate outdoor sports provisions near to the major residential developments RES-RA6.1-6.5, RES-RA2.1/2.2 Wirral Waters Area (approximately 3,900 dwellings), RES-RA5.1 Hind Street, Tranmere (1,400 dwellings) and only a cricket ground near to RES-SA4.7 Former D1 Oils, Dock Road South, Bromborough (1,225 dwellings). Each of these allocations will require significant outdoor sports provision and contributions. However, the wide range of viability and deliverability issues, including but not limited to lack of space on the various sites (similar to paragraph 1.22) and substantive evidence demonstrating an absence of commercial viability for development alone (excluding contributions to meet policy requirements), it is clear and obvious that the provision and success of outdoor sports provision for the majority of the allocated sites is non-existent. [RES SA 4.7 location adjacent to RAM -2 puts sites of international importance at risk, RES SA 4.2 adjacent to NIA-7 (Nature Improvement Area) and LWS-SA8.35 (Local Wildlife Site).</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	<p>No comment</p>
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in</p>	

<p>relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>1 Given the flaws in the Council's evidence and plan-making approach, it is considered that the changes necessary to produce a sound Local Plan go beyond what could be considered 'Main Modifications'.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? * No, I do not wish to participate in</p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>Leverhulme Estate considers that the Council's overall development strategy is fundamentally flawed and that this could have a detrimental effect on Leverhulme's landholdings for the next couple of decades. In this case, the proposed Nature Improvement Areas (NIAs) are of particular concern given our belief that these have not been identified on the basis of comprehensive and properly evidenced analysis. Therefore, as one of the principal rural landowners impacted by the draft policies and designations, Leverhulme wishes to be heard.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

LPSD-1042

Comment ID	LPSD-1042
Person ID	1323898
Include files	LPSD-590, 1042 & 1046-EM-Watson Form 10 of 29 2507_Redacted.pdf
Consultee Name	Mr Nigel McGurk
Position	
Company / Organisation	Leverhulme Estate
Agent ID	1323897
Agent Name	Mr Edward Watson
Position	
Company / Organisation	Strutt and Parker
Number	Policy RA 11
Title	New Ferry Regeneration Area
To which part of the Local Plan does this representation relate?	Site
<ul style="list-style-type: none"> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment 	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this	RA 11.1

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
Please give details of why you consider the Local Plan is unsound. Please be	<p>Policy WS 6.3 – Masterplan Areas</p> <p>2.1 Paragraph 3.160 states that Masterplans will be required to either be produced and submitted as part of an Outline planning application to be approved by the Council, or as a Supplementary Planning Document to be adopted by the Council. It is considered that such an approach is not proportionate for all Masterplans and certainly not for all of the allocated sites. Although this policy enables a greater degree of flexibility for the developer/landowner to decide how the Masterplan is adopted, it could potentially delay the delivery of the Masterplan</p>

<p>as precise as possible.</p>	<p>sites. It is understood and accepted that a quicker approach to delivering a Masterplan would be through an outline application submission as opposed to creating an SPD, however an SPD would not be suitable for some of the smaller Masterplan sites, as they are less complex. It is considered that uniquely, each site should be allocated a specific process under this policy for how the Masterplan should be adopted to prevent smaller sites delivering a masterplan through an SPD or a larger site trying to agree a Masterplan through an outline application; both of which are disproportionate processes. This will ensure all the Masterplan sites agree Masterplans through the most efficient process and are delivered within an acceptable timescale and not delayed by the Masterplan adoption process.</p> <p>2.2 It is also considered that the allocation of some of the smaller sites as Masterplan areas is disproportionate and would unnecessarily delay the delivery of these sites. It is believed that there are alternative processes, which are more suitable and efficient to ensure some of the smaller sites are delivered sufficiently to a high standard than through submitting and agreeing Masterplans. In particular sites: MPA-RA2.1, MPA-RA2.2 and MPA-RA11.1, are considered of an insignificant scale to require a Masterplan as the same control and detail can be addressed through the planning application process i.e. outline planning applications and agreeing parameters plans. These sites could alternatively be allocated for their intended specific uses instead which would prevent Masterplans being required and speed up the delivery of the sites. It is anticipated that the local authority must acknowledge that these small scale sites need Masterplans due to constraints with the site and therefore there is a question of whether these smaller sites can be delivered.</p> <p>2.3 It is also noted that the Local Development Scheme for the Wirral 2022 does not identify the intention to prepare such SPDs or Masterplans and clearly, because of time and resource constraints, these are not being considered as part of the emerging Local Plan. It is considered that if the local authority endorsed the procedure of preparing and adopting SPDs and Masterplans concurrently with the emerging Local Plan this would speed up the delivery of the sites when the plan is adopted, particularly as SPDs may also necessitate the preparation of a Strategic Environmental Assessment.</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	N/A
<p>If you wish to make a separate representation,</p>	N/A

relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Each masterplan area should have processes for Masterplan adoption through either outline application or an SPD. Some of the smaller sites should be removed from the Masterplan allocation.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>Leverhulme has an interest and stake in the development and implementation of the policy and wishes to be heard in its development.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

LPSP-1043

Comment ID	LPSP-1043
Person ID	1323898
Include files	LPSP-605, 1041, 1043 & 1044-EM-Watson Form 25 of 29 2507_Redacted.pdf
Consultee Name	Mr Nigel McGurk
Position	
Company / Organisation	Leverhulme Estate
Agent ID	1323897
Agent Name	Mr Edward Watson
Position	
Company / Organisation	Strutt and Parker
Number	Policy WP 7.2
Title	Residential Sites
To which part of the Local Plan does this representation relate?	Site
<ul style="list-style-type: none"> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment 	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this	RES SA 7.5

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	1.26 This results in fundamental delivery problems and in turn results in a draft Local Plan which is not sound. 1.27 The proposed allocation of all of the sites below results in direct conflict with Policy WD3. 1.28 RES-SA4.7 (Former D1 Oils, Dock Road South, Bromborough) for a capacity of 1,225 dwellings is adjacent to SPA-2 (Special Protection Area), SSI-SA3.1 (Site of Special Scientific Interest) and NIA-5 (Nature Improvement Area). Secondly, RES-SA7.5 (Willowbank, 33 Oldfield Road, Heswall) is located inside SSI-SA7.1 (Site of Special Scientific Interest) and NIA-3

<p>as precise as possible.</p>	<p>(Nature Improvement Area). Thirdly RES-SA4.2 (Former MOD, Old Hall Road, Bromborough) for 250 dwellings is adjacent to NIA-7 (Nature Improvement Area) and LWS-SA8.35 (Local Wildlife Site). Fourthly RES-SA1.2 (Gibson House, Seabank Road, Egremont) / RES-SA1.3 (Rear of Gibson House, Maddock Road, Egremont) for a capacity of a combined 102 dwellings is adjacent to SSISA11.1 (Site of Special Scientific Interest), NIA-5 (Nature Improvement Area) and SPA-3/4 (Special Protected Area).</p> <p>1.29 These sites are faced with fundamental viability and deliverability issues, not even taking into account environmental requirements. There is no substantive evidence at all to demonstrate that they could avoid, mitigate or compensate the very significant biodiversity harm arising in addition to overcoming the overwhelming viability and deliverability issues identified elsewhere in Leverhulme's representations and in representations made by the majority of the development industry, amongst others.</p> <p>1.30 Further to the above it is clear, having regard to national policy, that there are viable, deliverable alternative sites in Wirral that can provide for development in a way that meets environmental requirements. Wirral Council has failed to take these into account and has instead, chosen to allocate sites, regardless of the fundamental environmental constraints and the conflict with national and international environmental policy.</p> <p>1.31 For example, the vision proposed by Leverhulme would allow significant housing development away from and not in close proximity to protected/designated sites in Wirral. Importantly, the development of these sites will viably and appropriately contribute to the provision and to the delivery of the notable improvement of biodiversity/geodiversity in Wirral. Point 6.22 mentions "Clauses A and B identify that all development is expected not to adversely affect a SSSI, harm the integrity of a European Site, or result in the loss or deterioration of irreplaceable habitats". This is a further contradiction. Locating major development, such as site RES-SA4.7 (Former D1 Oils, Dock Road South, Bromborough) for a capacity of 1,225 dwellings, next to a site of European Importance will, without clear substantive evidence to demonstrate how development can be delivered, viably, in a manner that will not result in damage to biodiversity/geodiversity conflict with this policy. The draft Local Plan runs the very real risk of allocating land for development that has no realistic prospect of development; and further, the very real risk of supporting development that will harm and fail to provide appropriate compensation and mitigation in respect of biodiversity sites of national and European importance. This is a significant issue as the environmental impact and the disturbance from the construction and operational phases of the allocated residential sites, which are in close proximity to the sites of European Importance will undoubtedly have a significant impact in terms of air, water and noise pollution. As previously emphasised in Paragraph 1.18, the Leverhulme Vision would allow undoubtable improvements in the biodiversity/geodiversity whilst moving development away from consequently harming sites of European Importance which should be a critical objective of the Local Plan in line with National Policy. This is a much better approach in safeguarding the protected bird species, which would be subject to a significant impact from residential development adjacent to their designated habitats.</p> <p>Points 6.23, 6.24 and 6.26 state the need for a separate statutory document for developments that may have a detrimental impact on European Designated Sites and the need for nonbreeding bird surveys during the autumn, winter and spring months. Construction within 300m of the SPA's/Ramsar sites or functionally linked habitat parcels should also be carried out during the months between April and August, due to the impact also on European Designated sites.</p> <p>1.34 In addition to all of the above, the timescale of the delivery of developments in close proximity to European Designated States as emphasised in paragraph 1.23 will be adversely impacted due to seasonal restrictions of construction and surveys required prior to development.</p> <p>1.35 These surveys should, in any case, have been conducted prior to the Call for Sites. This was not done, possibly due to the fundamental impacts highlighted above.</p> <p>1.36 The only logical result of this is more major delays and impediments to delivery. There can be little, if any doubt, that this would impact on the timescale of the delivery of the proposed residential developments even if it was somehow proven and there is no substantive evidence at all in this regard that viable delivery was indeed possible. This is an additional factor undermining the soundness of the draft Local Plan.</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	

<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	<p>No comment</p>
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound.</p>	<p>Given the flaws in the Council's evidence and plan-making approach, it is considered that the changes necessary to produce a sound Local Plan go beyond what could be considered 'Main Modifications'. In this instance, it is considered that the allocation of housing sites in close proximity to protected European sites directly contradicts with the objectives of policy WD3.</p>

<p>It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>Leverhulme Estate considers that the Council's overall development strategy is fundamentally flawed and that this could have a detrimental effect on Leverhulme's landholdings for the next couple of decades. Therefore, as one of the principal rural landowners impacted by the draft Local Plan, Leverhulme wishes to be heard.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

Comment ID	LPSD-1044
Person ID	1323898
Include files	LPSD-605, 1041, 1043 & 1044-EM-Watson Form 25 of 29 2507_Redacted.pdf
Consultee Name	Mr Nigel McGurk
Position	
Company / Organisation	Leverhulme Estate
Agent ID	1323897
Agent Name	Mr Edward Watson
Position	
Company / Organisation	Strutt and Parker
Number	Policy WP 1.2
Title	Residential Sites
To which part of the Local Plan does this representation relate?	Site
<ul style="list-style-type: none"> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment 	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this	RES-SA.1.2, RES-SA.1.3

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	1.23 Sites RES-SA1.2 (Gibson House, Seabank Road, Egremont) / RES-SA1.3 (Rear of Gibson House, Maddock Road, Egremont), allocated for 102 dwellings combined, are adjacent to RAM3 (Mersey Narrows & North Wirral Foreshore). and SSSI SAI1.1. NIA 5 and SPA3/4/ 1.24 The plan allocates sites in inappropriate places without suitable protection or viable/deliverable scope for appropriate protection of the remarkable biodiversity and geodiversity in the Wirral, when there are viable/deliverable alternatives, for example the Leverhulme Vision.

as precise as possible.	
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	No comment
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	For all the reasons given in this representation, we do not believe the HRA / AA can be concluded favourably so as to allow the Local Plan to be adopted given Regulation 63 of the Habitat Regulations
Please set out the modification(s) you consider necessary to make the Local	Given the flaws in the Council's evidence and plan-making approach, it is considered that the changes necessary to produce a sound Local Plan go beyond what could be considered 'Main Modifications'. In this instance, it is considered that the allocation of housing sites in close proximity to protected European sites directly contradicts with the objectives of policy WD3.

<p>Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s), please outline why</p>	<p>Leverhulme Estate considers that the Council's overall development strategy is fundamentally flawed and that this could have a detrimental effect on Leverhulme's landholdings for the next couple of decades. Therefore, as one of the principal rural landowners impacted by the draft Local Plan, Leverhulme wishes to be heard.</p>

you consider this to be necessary:	
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

LPSP-1045

Comment ID	LPSP-1045
Person ID	1324021
Include files	LPSP-1045 and 1095-EM-Evans Attach 2507 Redacted.pdf
Consultee Name	Ms Kate McClean
Position	
Company / Organisation	Bloor Homes North West
Agent ID	1248824
Agent Name	Mr Lewis Evans
Position	Associate Director
Company / Organisation	Turley
Number	Policy WS 1.1
Title	Homes
To which part of the Local Plan does this representation relate?	Site
* Paragraph(s)	
* Policy	
* Site	
* Policies Map	
* Sustainability	
* Appraisal	
* Habitat	
* Regulations	
* Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this	LAND AT SAUGHALL MASSIE ROAD, GREASBY

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	<p>Please refer to attachment and read alongside the Housing Consortium submissions (LPSP 408)</p> <p>The proposed spatial distribution is flawed and contrary to the LP Vision and Strategic Objectives which seek to inter alia enable the provision of sufficient housing to meet identified local housing needs and choice. The DWLP Vision refers to Wirral in 2037 offering 'a high quality of life to all', 'an attractive place to live' and which 'makes a significant contribution to the economic competitiveness and international standing' of the City region. The Vision also specifically refers to the role of towns and villages in West Wirral, and seeks that they 'remain stable having experienced small scale incremental development that has allowed them to continue to thrive within a landscape protected by Green Belt designation'.</p> <p>At present, the Regulation 19 Local Plan is based on a deficient evidence base with respect to the assessment of Green Belt release and an unsound spatial strategy which is not justified, not positively prepared, contrary to national planning policy and not effective. The Regulation 19 Local Plan is therefore unsound. Soundness can be corrected through the release of the subject site from the Green Belt and its subsequent allocation</p>
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	<p>Not Positively Prepared</p> <p>Not Effective</p> <p>Not Consistent with National Policy</p>
Please give details of why you consider the	

Local Plan is unsound. Please be as precise as possible.	
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you	release green belt site at Saughall Massie Road, Greasby

consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing session(s)

* Yes, I wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

If you wish to participate in the

hearing session(s), please outline why you consider this to be necessary:	
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	Yes

LPSP-1046

Comment ID	LPSP-1046
Person ID	1323898
Include files	LPSP-590, 1042 & 1046-EM-Watson Form 10 of 29 2507_Redacted.pdf
Consultee Name	Mr Nigel McGurk
Position	
Company / Organisation	Leverhulme Estate
Agent ID	1323897
Agent Name	Mr Edward Watson
Position	
Company / Organisation	Strutt and Parker
Number	Policy RA 2
Title	Scott's Quay Regeneration Area
To which part of the Local Plan does this representation relate?	Site
* Paragraph(s)	
* Policy	
* Site	
* Policies Map	
* Sustainability	
* Appraisal	
* Habitat	
* Regulations	
* Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this	MPA RA2.1/MPA RA2.2

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
Please give details of why you consider the Local Plan is unsound. Please be	Policy WS 6.3 – Masterplan Areas 2.1 Paragraph 3.160 states that Masterplans will be required to either be produced and submitted as part of an Outline planning application to be approved by the Council, or as a Supplementary Planning Document to be adopted by the Council. It is considered that such an approach is not proportionate for all Masterplans and certainly not for all of the allocated sites. Although this policy enables a greater degree of flexibility for the developer/landowner to decide how the Masterplan is adopted, it could potentially delay the delivery of the Masterplan

<p>as precise as possible.</p>	<p>sites. It is understood and accepted that a quicker approach to delivering a Masterplan would be through an outline application submission as opposed to creating an SPD, however an SPD would not be suitable for some of the smaller Masterplan sites, as they are less complex. It is considered that uniquely, each site should be allocated a specific process under this policy for how the Masterplan should be adopted to prevent smaller sites delivering a masterplan through an SPD or a larger site trying to agree a Masterplan through an outline application; both of which are disproportionate processes. This will ensure all the Masterplan sites agree Masterplans through the most efficient process and are delivered within an acceptable timescale and not delayed by the Masterplan adoption process.</p> <p>2.2 It is also considered that the allocation of some of the smaller sites as Masterplan areas is disproportionate and would unnecessarily delay the delivery of these sites. It is believed that there are alternative processes, which are more suitable and efficient to ensure some of the smaller sites are delivered sufficiently to a high standard than through submitting and agreeing Masterplans. In particular sites: MPA-RA2.1, MPA-RA2.2 and MPA-RA11.1, are considered of an insignificant scale to require a Masterplan as the same control and detail can be addressed through the planning application process i.e. outline planning applications and agreeing parameters plans. These sites could alternatively be allocated for their intended specific uses instead which would prevent Masterplans being required and speed up the delivery of the sites. It is anticipated that the local authority must acknowledge that these small scale sites need Masterplans due to constraints with the site and therefore there is a question of whether these smaller sites can be delivered.</p> <p>2.3 It is also noted that the Local Development Scheme for the Wirral 2022 does not identify the intention to prepare such SPDs or Masterplans and clearly, because of time and resource constraints, these are not being considered as part of the emerging Local Plan. It is considered that if the local authority endorsed the procedure of preparing and adopting SPDs and Masterplans concurrently with the emerging Local Plan this would speed up the delivery of the sites when the plan is adopted, particularly as SPDs may also necessitate the preparation of a Strategic Environmental Assessment.</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	N/A
<p>If you wish to make a separate representation,</p>	N/A

<p>relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Each masterplan area should have processes for Masterplan adoption through either outline application or an SPD. Some of the smaller sites should be removed from the Masterplan allocation.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>Leverhulme has an interest and stake in the development and implementation of the policy and wishes to be heard in its development.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

Comment ID	LPSD-1047
Person ID	1248612
Include files	LPSD-535,1047-EM-Woodford Attach 2507_Redacted.pdf
Consultee Name	AM Ventures 3
Position	
Company / Organisation	
Agent ID	1323869
Agent Name	Mr Richard Woodford
Position	
Company / Organisation	Avison Young
Number	Policy WS 1.1
Title	Homes
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1.1
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	No
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>It is noted that WBC has had a longstanding commitment and aspiration to regenerate Birkenhead, Wirral Waters and other areas within east Wirral. However, despite Council support, the regeneration aspirations have never materialised at the time envisaged and therefore it is very concerning that the Local Plan is effectively the continuation of a longstanding and persistently underachieving strategy. It is considered that the claimed supply on the Regeneration Areas within the Local Plan Submission Draft in particular is being overstated and the Council has not provided sufficient evidence to demonstrate that some sites or specific portions of the sites will have a realistic prospect' of coming forward as envisaged within the Plan Period.</p> <p>Draft Policy WS 1.1 is not considered to be sound as it is not positively prepared, justified, effective or consistent with national policy for the reasons set out in Section 4 of these representations and the Consortium representations</p>

<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</p>	

any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

- * No, I do not wish to participate in hearing session(s)
- * Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).

* **Yes**
* **No**

LPSP-1048

Comment ID	LPSP-1048
Person ID	1237833
Include files	LPSP-1048-61-EM-Harding Attach 2507_Redacted.pdf
Consultee Name	Joanne Harding
Position	Planning Manager – Local Plans North
Company / Organisation	Home Builders Federation
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 1.1
Title	Homes
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1.1
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>Please refer to attachment.</p> <p>The HBF supports moving towards greater energy efficiency via a nationally consistent set of standards and a timetable for achieving any enhancements which is universally understood and technically implementable. The HBF acknowledges that the Government has not enacted its proposed amendments to the Planning & Energy Act 2008 to prevent the Council from stipulating energy performance standards that exceed the Building Regulations. However, the HBF considers that the key to success is standardisation and avoidance of every Council in the country specifying its own approach to energy efficiency, which would undermine economies of scale for both product manufacturers, suppliers and developers.</p> <p>The HBF supports the Council in using the standard method as the starting point for the calculation of the housing requirement... also supports including an uplift to support economic growth, although we consider that the uplift should be significantly above that currently proposed.</p>

	<p>The HBF also considers that it is appropriate for the Council to give consideration to the number of dwellings to be lost each year to demolition, change of use or conversion either as part of the supply calculation or the housing requirement.</p> <p>the Council will need to take into account the aspirations of the 'Northern Powerhouse' agenda, the Liverpool City Region (LCR) Combined Authority Devolution Deal, the LCR Local Enterprise Partnership's Strategic Economic Plan and the Wirral Growth Plan amongst others. The NPPF is clear that planning policies should 'seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment', there is a clear risk that if sufficient housing is not provided these growth strategies will not be delivered, that jobs growth will not be met or that unsustainable commuting patterns will be created.</p> <p>The HBF does not wish to comment upon the acceptability or otherwise of individual sites. It is, however, important that all the sites contained within the plan are deliverable over the plan period and planned to an appropriate strategy. The Council's assumptions on sites in relation to delivery and capacity should be realistic based on evidence supported by the parties responsible for housing delivery and sense checked by the Council based on local knowledge and historical empirical data.</p> <p>The HBF also strongly recommends that the plan allocates more sites than required to meet the housing requirement as a buffer. This buffer should be sufficient to deal with any under-delivery which is likely to occur from some sites. Such an approach would be consistent with the NPPF requirements for the plan to be positively prepared and flexible.</p> <p>The HBF notes that the supply includes an allowance for conversions, changes of use, windfall and the return to use of empty homes. The HBF would generally recommend that these allowances are not included in the supply and instead form part of the flexibility in supply. However, the HBF recommends that if the Council intends to include an allowance for conversions, changes of use, windfall and the return to use of empty homes that they have an appropriate evidence base to support this, this would be in line with the NPPF which states that where an allowance is made for windfall sites there should be compelling evidence that they will provide a reliable source of supply. The HBF also considers that historic trends may not always be an accurate reflection, particularly in areas that have not adopted a Plan in the last 20 years. Again, if an allowance is to be included within the supply the HBF would suggest that the allowance is not included within the first three years from examination of the Plan to avoid double counting.</p>
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	

<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>[not explicitly stated but: higher housing requirement, adjustment to elements of calculated supply, removal of local carbon neutrality target]</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to</p>	

<p>participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

Comment ID	LPSD-1049
Person ID	1237833
Include files	LPSD-1048-61-EM-Harding Attach 2507_Redacted.pdf
Consultee Name	Joanne Harding
Position	Planning Manager – Local Plans North
Company / Organisation	Home Builders Federation
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 2
Title	Social Value
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 2
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer to attachment. .. HBF does not consider that it is necessary to include a policy requiring major proposals to provide details of what social value outcomes will be delivered and how this will be measured and assessed. This is an unnecessary burden to place on applicants and is unlikely to add value to a development, over and above the general benefits associated with development as set out above (in the attachment) . Part C of this policy looks for major development proposals to use local labour and provide training and skills for local communities using an agreed employment and skills plan. The HBF considers that the Council will need to consider how this would work for the home building industry, particularly in relation to the construction period and what this would mean for longer term job stability. Whilst increasing the numbers of people working in the construction industry, along with upskilling and increasing the diversity of the workforce is a top priority for the HBF, this needs to be done in the right way.

	The HBF considers that the Council will also need to consider the costs that would be associated with this policy and ensure that it is considered as part of the viability requirements. This may have a particular impact on the SME builders in the area who may not have the job opportunities available or the resources to provide appropriate training.
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	[delete the policy / ensure costs are considered as part of the viability requirements]

Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

- * No, I do not wish to participate in hearing session(s)
- * Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why

you consider this to be necessary:	
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	

LPSP-1050

Comment ID	LPSP-1050
Person ID	1237833
Include files	LPSP-1048-61-EM-Harding Attach 2507_Redacted.pdf
Consultee Name	Joanne Harding
Position	Planning Manager – Local Plans North
Company / Organisation	Home Builders Federation
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 3.1
Title	Housing Design Standards
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.1
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	please refer to attachment: authority should provide justification for requiring internal space standards.. and a local assessment evidencing their case.... floorspace assumptions in viability assessment do not reflect NDSS particularly allowing for higher density requirements .. Water efficiency standards must be justified ... not considered justified when area is not one of water stress as identified by the Environment Agency.... zero carbon ready by design should be left to building regulations.... accessible and adaptable standards consider that Council has provided insufficient evidence and concern regarding consideration in viability assessment.....

	the HBF therefore considers that these housing design standards should be deleted, or if retained further evidence collated to justify their inclusion and for a viability clause to be included in the policy to recognise the viability issues that may arise due to the cumulative impact of these requirements alongside other policy requirements.
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	HBF therefore considers that these housing design standards should be deleted, or if retained further evidence collated to justify their inclusion and for a viability clause to be included in the policy to recognise the viability issues that may arise due to the cumulative impact of these requirements alongside other policy requirements.

Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

- * No, I do not wish to participate in hearing session(s)
- * Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why

Yes, I wish to participate in hearing session(s)

you consider this to be necessary:	
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>