Comment ID	LPSD-101
Person ID	1237546
Include files	
Consultee Name	Dr Hilary Ash
Position	Hon Conservation Officer
Company / Organisation	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WM 4.4
Title	Overall Assessment
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.	WM4.4
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 as precise as possible.	Plan says no unacceptable adverse impacts on human health, general amenity, the climate, safety, traffic management, water, air quality, ecology, geology, the landscape, archaeology and the natural and historic environment. For reasons of not adding to climate change, to be sound this Plan should rule out fossil fuel extraction.

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 hydrocarbon extraction will have adverse effects on the climate during use of the hydrocarbons extracted.  Fossil Fuel Extraction should be ruled out

any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note thatnon-compliance with the duty to co-operate is incapable of modification at examination). You will need to saywhy each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessement 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

Comment ID	LPSD-102
Person ID	1237546
Include files	
Consultee Name	Dr Hilary Ash
Position	Hon Conservation Officer
Company / Organisation	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Appendix 17
Title	Environmental Designations
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.	3.108, Appendix 17
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	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.	Updates needed to Appx 17 list

omplies with the Duty to co-operate * Yes * No	
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	Hoylake Langfields and Bidston Moss Community Woodlands proposed LWSs are missing from the list, though shown on Fig 2.6. These two new LWS should be listed in Appx 17 as 'proposed'. Irby Quarry SA8.4 and Old Sewage Works Clatterbridge SA8.27 are still listed although the LWSP had decided to delete them. An explanation of Site of Biological Importance , Local Wildlife site and why we have both equivalent terms is needed somewhere. Sites are being move from SBI to LWS status as new biological surveys are done and citations updated. However all this work is done by volunteers, made slower as Covid disrupted surveys for a year.

any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note thatnon-compliance with the duty to co-operate is incapable of modification at examination). You will need to saywhy each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessement 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

Comment ID	LPSD-103
Person ID	1323157
Include files	
Consultee Name	Liz Tudor
Position	
Company / Organisation	
Agent ID	1323156
Agent Name	David Butler
Position	
Company / Organisation	
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-SA4.11

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.	It does not comply with NPPF paragraphs 130 and 131  Criterion K  It is considered that the policy is not sound as it does not provide strong enough protection for existing trees on the site, in that it only refers to established trees, without being clear what this includes. The frontage along Quarry Road East contains a number of existing trees of varying sizes which currently make a positive contribution to the character and street scene. To ensure that any new housing development integrates with the existing housing along Quarry Road East it is essential that these are retained. Furthermore, this would also assist in the policy complying with NPPF paragraph 131 which recognises that trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change, and that planning policies should require planning policies to that new streets are tree-lined (by retaining the existing trees). Furthermore NPPF paragraph 130

	(b and c) seeks to ensure that through planning policies, new developments are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; as well as being sympathetic to local character.
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	Therefore it is recommended that criterion 1 should be re-worded as follows: "1. Integrates, protects and retains established trees and woodland in and around the site, in particular the frontage along Quarry Road East, and promotes wildlife corridors through the site and into neighbouring woodland;"

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 thatnon-compliance with the duty to co-operate is incapable of modification at examination). You will need to saywhy each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessement 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)	No, I do not 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	

Comment ID	LPSD-104
Person ID	1323157
Include files	
Consultee Name	Liz Tudor
Position	
Company / Organisation	
Agent ID	1323156
Agent Name	David Butler
Position	
Company / Organisation	
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 Site Site Site Site Site Site 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-SA4.11

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	Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	It does not compley with paragraphs 110 and 111 of the NPPF  It is considered that the policy is not sound as it should not provide for two accesses into the development site from Quarry Road East. In assessing the site for development, the access to the east (as indicated in evidence base document 'T13.2 - Wirral Local Plan Urban Site Accessibility and Utilities 2022' Site ref: RES-SA4.11 – Unilever Research and Development Site) is not considered to provide a safe and suitable access to the site for all users in line with NPPF paragraph 110 (b) and that development would have an unacceptable impact on highways safety (NPPF paragraph 111). This is because existing housing along the north side of Quarry Road East at this point, does not have off-street parking, which necessitates parking on the highway. While this is identified in document 'T13.2 - Wirral Local Plan Urban Site Accessibility and Utilities 2022' it is referred to as " a light amount of on-street parking associated with the residential developments along Quarry Road East" It may be the time of day that the survey was undertaken, but the amount of on-street parking on Quarry Road

	East at this point is not "light", and therefore allowing an access into the development site at this point would go against the NPPF. Furthermore, the suggestion in document 'T13.2 - Wirral Local Plan Urban Site Accessibility and Utilities 2022' that parking restrictions along Quarry Road East is unfair on existing residents of Quarry Road East who have no other option than parking on the street.
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	Therefore criterion 2 should be amended to say: "2. provides highway access via a single access point from Quarry Road East;"

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 thatnon-compliance with the duty to co-operate is incapable of modification at examination). You will need to saywhy each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessement 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.	
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)	No, I do not 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	Yes

Comment ID	LPSD-105
Person ID	1323157
Include files	
Consultee Name	Liz Tudor
Position	
Company / Organisation	
Agent ID	1323156
Agent Name	David Butler
Position	
Company / Organisation	
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 SA4.11

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
<ul><li>Legally compliant</li><li>Yes</li><li>No</li></ul>	
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 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 Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	It does not comply with paragraphs 104 and 106 of the NPPF  It is considered that the policy is not sound as it does not provide for access to the site by walking and cycling infrastructure, as indicated by NPPF paragraph 104 (c) which says that opportunities to promote walking, cycling should be pursued and NPPF paragraph 106 (d) which says that planning policies should provide for attractive and well-designed walking and cycling networks. While criteria 3.i and 3.ii do seek improvements of walking and cycling infrastructure in the vicinity, the policy fails to address opportunities to connect the site to the surrounding walking and cycling network. It is suggested that the footway to the south of Quarry Road East could be upgraded to a LTN 1/20 standard to provided segregated cycle path between Bromborough Road (to the east) and Church Road (to the west). This would allow the connection to the existing cycle path at the junction of Church Road and Quarry Road East to Stanton Road and onwards to Clatterbridge Hospital, meaning the site is connected to wider infrastructure and essential services by non-car alternatives.

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	Therefore an additional criterion should be added to say: "3.iii provides a LTN 1/20 compliant cycle path, between Bromborough Road and Church Road, on the south side of Quarry Road East;"

any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note thatnon-compliance with the duty to co-operate is incapable of modification at examination). You will need to saywhy each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessement 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)	No, I do not 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	Yes
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	

Comment ID	LPSD-106
Person ID	1323159
Include files	LPSD-106-PDF-WALKER-2606-Redacted.pdf
Consultee Name	Mr Neil Walker
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Appendix 13
Title	Local Green Space
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.	LGS-SA6.3 Greenfield Estate

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.	It fulfills the remit and considers the viewpoints and safety of local residents
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.	Having read the local pan for Wirral and its designation of the West Kirby Greenfields Estate site as local Green space I am satisfied it shows a vested interest in the welfare of this community and understands the needs of a town like West Kirby and the greater Wirral area and thus fully support your proposal
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	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	For this site the local plan cooperates with the collective wishes of the community of West Kirby and the Wirral as a whole
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	It is my belief & wish that there should be no modifications to the plan regarding West Kirby Greenfields Estate site LGS SA6.3

any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note thatnon-compliance with the duty to co-operate is incapable of modification at examination). You will need to saywhy each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessement 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:

Comment ID	LPSD-107
Person ID	1237546
Include files	
Consultee Name	Dr Hilary Ash
Position	Hon Conservation Officer
Company / Organisation	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WD 3
Title	Biodiversity and Geodiversity
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.	6.29
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	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.	Paragraph second part, about significance, is difficult to understand and does not make it clear who assesses the significance of an asset.

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	Add: The EcIA will assess the significance of ecological assets and justify that assessment. It will be for the Council and its ecological advisors to consider whether they agree with that assessment, and ask for further information if there is disagreement. Where land has been cleared before an ecological assessment was done, then the biodiversity will be assessed as a good example of the previous habitat type, as advised under the DEFRA Biodiversity metric or future equivalent national advice.  To be effective, add <b>reference to Policies WS 5.4</b> re recent damage to sites, and how the ecological value is to be addressed in that circumstance, and <b>WS5.7 re maintenance</b> for life of development or 30 years, whichever is longer.

any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note thatnon-compliance with the duty to co-operate is incapable of modification at examination). You will need to saywhy each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessement 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)	No, I do not 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	Yes
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	

Comment ID	LPSD-109
Person ID	1248569
Include files	LPSD-109-111, 113-117-EM-SEFTONMBC-1406-A1_Redacted.pdf
Consultee Name	Derek McKenzie
Position	
Company / Organisation	Sefton Council
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	Yes
why you consider the	It is noted that Wirral proposes to allocate enough housing land for 17,750 dwellings over the plan period. This significantly exceeds the requirement for 13,360 homes. This will allow for market competition and for some flexibility for changes in housing need and for some sites not coming forward during the Local Plan period. The number of houses anticipated, if delivered, would enable Wirral to meet all its own housing needs and there would be no implications for neighbouring authorities such as Sefton.
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	Yes
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	

Notification of Next Stages in Wirral's	Yes
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	

Comment ID	LPSD-110
Person ID	1248569
Include files	LPSD-109-111, 113-117-EM-SEFTONMBC-1406-A1_Redacted.pdf
Consultee Name	Derek McKenzie
Position	
Company / Organisation	Sefton Council
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Part 3
Title	Strategic Policies
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.	3.15
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	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	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	It is noted that Wirral proposes to allocate enough housing land for 17,750 dwellings over the plan period. This significantly exceeds the requirement for 13,360 homes. This will allow for market competition and for some flexibility for changes in housing need and for some sites not coming forward during the Local Plan period. The number of houses anticipated, if delivered, would enable Wirral to meet all its own housing needs and there would be no implications for neighbouring authorities such as Sefton.
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	Yes
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	

Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral	Yes
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	

Comment ID	LPSD-111
Person ID	1248569
Include files	LPSD-109-111, 113-117-EM-SEFTONMBC-1406-A1_Redacted.pdf
Consultee Name	Derek McKenzie
Position	
Company / Organisation	Sefton Council
Agent ID	
Agent Name	
Position	
Company / Organisation	
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	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	Yes
why you consider the	Wirral have identified a need for 53 hectares of employment land, based on the recently completed Liverpool City Region SHELMA (Strategic Housing and Employment Land Market Assessment) and the Wirral Employment Land and Premises Study (2021). The Local Plan allocates land for 65.6ha of employment land. The Wirral is therefore proposing to meet its own employment land requirement.  The SHELMA Study also identified a need for large scale B8 storage provision across the Liverpool City Region but recognised that functionally this could be located anywhere in the City Region. No specific requirement was identified for Wirral, and none is specifically included in Wirral's current options.
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
* 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.	As the Local Plan is proposing to meet Wirral's own employment needs, Sefton Council have no objections. Sefton is not in a position to meet any of Wirral's employment needs for the foreseeable future.
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	

Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral	Yes
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	

Comment ID	LPSD-113
Person ID	1248569
Include files	LPSD-109-111, 113-117-EM-SEFTONMBC-1406-A1_Redacted.pdf
Consultee Name	Derek McKenzie
Position	
Company / Organisation	Sefton Council
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Part 3
Title	Strategic Policies
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.	3.27
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	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	Yes
why you consider the	Wirral have identified a need for 53 hectares of employment land, based on the recently completed Liverpool City Region SHELMA (Strategic Housing and Employment Land Market Assessment) and the Wirral Employment Land and Premises Study (2021). The Local Plan allocates land for 65.6ha of employment land. The Wirral is therefore proposing to meet its own employment land requirement.  The SHELMA Study also identified a need for large scale B8 storage provision across the Liverpool City Region but recognised that functionally this could be located anywhere in the City Region. No specific requirement was identified for Wirral, and none is specifically included in Wirral's current options.
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	Yes
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	

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

Comment ID	LPSD-114
Person ID	1248569
Include files	LPSD-109-111, 113-117-EM-SEFTONMBC-1406-A1_Redacted.pdf
Consultee Name	Derek McKenzie
Position	
Company / Organisation	Sefton Council
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 11
Title	Strategy for town and local centres
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
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	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	It is noted that no major out of town retail is being proposed by the Wirral Local Plan. It is also noted that the Local Plan intends to strengthen the existing town centres and make them more flexible and fit for purpose going forward.
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	Yes
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	

Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral	Yes
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	

Comment ID	LPSD-115
Person ID	1248569
Include files	LPSD-109-111, 113-117-EM-SEFTONMBC-1406-A1_Redacted.pdf
Consultee Name	Derek McKenzie
Position	
Company / Organisation	Sefton Council
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	Policy
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	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	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	It is noted that Birkenhead Town Centre is subject to ambitious regeneration proposals to enhance the town centre. It is not considered that this will have an significant impact upon Bootle Town Centre or upon any of Sefton's other centres. This approach is supported by Sefton, whilst recognising that the retail connections between Wirral and Sefton are very limited.
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	Yes
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	

Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral	Yes
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	

Comment ID	LPSD-116
Person ID	1248569
Include files	LPSD-109-111, 113-117-EM-SEFTONMBC-1406-A1_Redacted.pdf
Consultee Name	Derek McKenzie
Position	
Company / Organisation	Sefton Council
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 5.5
Title	Mitigating Recreational Disturbance on International Sites for Nature Conservation
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 5.5
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	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	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	In terms of biodiversity, Wirral's preferred approach to internationally Important sites and the references to the sub-regional recreation pressure mitigation is noted. This is consistent with the Liverpool City Region recreational Pressure approach.
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	Yes
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	

Comment ID	LPSD-117
Person ID	1248569
Include files	LPSD-109-111, 113-117-EM-SEFTONMBC-1406-A1_Redacted.pdf
Consultee Name	Derek McKenzie
Position	
Company / Organisation	Sefton Council
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Part 2
Title	The Places and Our Vision
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.	2.24
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	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	Yes
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.	

omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	It is considered overall that the Wirral Local Plan will have no material impact upon Sefton Council. We also note the continued engagement and joint working on relevant strategic matters with Sefton Council throughout the Local Plan preparation and look forward to continued engagement through the examination and implementation of the Wirral Local Plan.  Sefton Council have no objections to the Wirral Local Plan although we reserve the right to comment if any modifications are proposed through the examination process.
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 thatnon-compliance with the duty to co-operate is incapable of modification at examination). You will need to saywhy each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessement 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	Yes
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	

Include files   LPSD-118-EM-Tilley 2308_Redacted poff		
Include files  Consultee Name  Mr Matthew Titley  Position  Company / Organisation Agent Name  Position  Company / Organisation  Agent Name  Position  Company / Organisation  Agent Name  Position  Company / Organisation  Agent Name  Position  Company / Organisation  Agent Name  Position  Company / Organisation  Number  Policy RA 4  Title Central Birkenhead Regeneration Area  To which part of the Local Plan does this eprepresentation voluble Paragraph(s)  Notice  Policy  Sitia  Policies Map  Sustainability Appraisal  Appraisal  Habitat  Regulations  Assessment  Polesas state which paragraph number(s) this representation  Polesas state which Policy Number this representation  Polesas state which Pol	Comment ID	LPSD-118
Consultee Name Position Company/ Organisation Agent ID Agent ID Company / Organisation Comp	Person ID	1323292
Matthew Titley Position Company / Organisation Agent ID Agent Name Position Company / Organisation Number Policy RA 4 Title Central Birkenhead Regeneration Area Policy RA 4 Title Central Birkenhead Regeneration Area Policy Local Plan does this representation relate to. Policy Statistaniability Approfision Ragulations Assessment Ragulations Assessment Ragulations Assessment Ragulations Assessment Ragulations Assessment Ragulations Rasessment Ragulations Rasessment Rase Ragulations Rasessment Rase Ragulations Rasessment Rase Ragulations Rasessment Rase Rase Rase Rase Rase Rase Rase Rase	Include files	LPSD-118-EM-Titley 2306_Redacted.pdf
Company / Organisation Agent Name Position Company / Organisation Organisation Number Policy R4 4 Central Birkenhead Regeneration Area Central Birkenhead Regen	Consultee Name	Matthew
Organisation Agent ID Agent Mane Position Company / Organisation Number Policy RA 4 Title Central Birkenhead Regeneration Area To which part of the Local Plan does not separation relate?  ** Paragraph(s) ** Policy RA 9  ** Policy ** Policy RA 9  ** Policy Manuber Regeneration Area  ** Policy RA 9  ** Policy Manuber Regeneration Area  ** Polic	Position	
Agent Name Position Company / Organisation Number	Company / Organisation	
Position Company / Organisation Number	Agent ID	
Company / Organisation  Number	Agent Name	
Policy RA 4   Policy RA 4	Position	
Title Central Birkenhead Regeneration Area  To which part of the Local Plan does this representation relate? Paragraph(s) Policy Site Policy Site Appraisal Habitat Regulations Assessment  Please state which Policy Number this representation relates to. Please state which Site ID/Reference this representation Please state which Site ID/Reference this representation	Company / Organisation	
To which part of the Local Plan does this representation relate? Paragraph(s) Site Policies Map Sustainability Appraisal Habitat Regulations Assessment  Please state which paragraph number(s) this representation relates to.  Please state which Site ID/Reference this representation  Please state which Site ID/Reference this representation	Number	Policy RA 4
Local Plan does this representation relate?  Paragraph(s) Policy Site Policies Map Sustainability Appraisal Habitat Regulations Assessment  Please state which paragraph number(s) this representation relates to.  Please state which Site ID/Reference this representation	Title	Central Birkenhead Regeneration Area
paragraph number(s) this representation relates to.  Please state which Policy Number this representation relates to.  Please state which Site ID/Reference this representation	Local Plan does this representation relate?  * Paragraph(s)  * Policy  * Site  * Policies Map  * Sustainability Appraisal  * Habitat Regulations	Policy
Policy Number this representation relates to.  Please state which Site ID/Reference this representation	Please state which paragraph number(s) this representation relates to.	
Site ID/Reference this representation	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	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	See attached file

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 thatnon-compliance with the duty to co-operate is incapable of modification at examination). You will need to saywhy each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessement 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
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Local Plan
2021-2037? (namely
submission of the
Plan for examination,
publication of the Inspector's
recommendations
and adoption of the
Plan).

\* Yes
\* No

Comment ID	LPSD-119
Person ID	1323285
Include files	LPSD-119-EM-Longman Form 0407_Redacted.pdf
Consultee Name	Mr Derek Longman
Position	
Company / Organisation	Friends of Grange Hill
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WP 6.2
Title	Hoylake Neighbourhood Plan Area
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.	RES-SA6.4
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	No No
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
why you consider the	We, the Friends of Grange Hill, do not believe the draft Plan should include land that has for many years had restricted covenants. These covenants were put in place on the 20th October 1982 with the explicit intention of protecting the annexed land and importantly the adjoining neighbouring land. These covenants must remain in place as they are required to protect the neighbouring Grange Hill, a Local Wildlife Site (LWS).  The Covenant clearly states that the land can only be used for a single private residence and not to use any part of the land for anything other than agricultural purposes.  It also protects the public right of way to pass and re pass (over part of the land edged in brown on the original covenant).  Grange Hill was originally purchased by the then local authority in the early years of the 20th century in order to protect it for the use and enjoyment of the local populace and other visitors.  Grange Hill has been included as a site of special scientific importance, a Local Wildlife site and a Regionally Important Geomorpholical Site.  For these reasons we at the Friends of Grange Hill oppose the inclusion of the adjoining land in any future plan for siting new housing. We therefore request this part of the housing proposal be removed from the draft plan.
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
	We, the Friends of Grange Hill, do not believe the draft Plan should include land that has for many years had restricted covenants. These covenants were put in place on the 20th October 1982 with the explicit intention of protecting the annexed land and importantly the adjoining neighbouring land. These covenants must remain in place as they are required to protect the neighbouring Grange Hill, a Local Wildlife Site (LWS).

unsound. Please be as precise as possible.	The Covenant clearly states that the land can only be used for a single private residence and not to use any part of the land for anything other than agricultural purposes.  It also protects the public right of way to pass and re pass (over part of the land edged in brown on the original covenant).  Grange Hill was originally purchased by the then local authority in the early years of the 20th century in order to protect it for the use and enjoyment of the local populace and other visitors.  Grange Hill has been included as a site of special scientific importance, a Local Wildlife site and a Regionally Important Geomorpholical Site.  For these reasons we at the Friends of Grange Hill oppose the inclusion of the adjoining land in any future plan for siting new housing. We therefore request this part of the housing proposal be removed from the draft plan.  On the 20th October 1982 Wirral Council placed Covenants on the land that was formerly Grange Hill Farm, (now included in the draft plan) with the explicit intention of protecting that land.  These covenants must remain in place as they are required to protect the neighbouring Grange Hill, a Local Wildlife Site (LWS).
omplies with the Duty to co-operate * Yes * No	No 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	As stated above. There are covenants covering the land bordering Grange Hill, Grange Hill is home to many protected species such as the Viviparous (common) lizard and badgers. It is also visited by many birds and mammals, such as bats some during nesting season and others as a foraging site.  We therefore question the validity of including the aforementioned site in any plan for housing development when Wirral has sufficient brown field sites, with development potential, to meet the housing target imposed by central government.  It is also the case that what Wirral along with other areas of the country need is development of affordable social housing – not upmarket executive homes!

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 thatnon-compliance with the duty to co-operate is incapable of modification at examination). You will need to saywhy each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessement 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:	The Friends of Grange Hill were not specifically consulted by Wirral Council in the drawing up of the draft plan.  We believe we should be fully consulted as a partner organisation at the outset of any proposed changes to any part of Grange Hill.
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	Yes

Comment ID	LPSD-120
Person ID	1311754
Include files	
Consultee Name	Dr Fraser M Smith Fraser Smith
Position	
Company / Organisation	
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-SA6.4

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
	RES-SA6.4 Land at Grange Hill Farm, West Kirby can only be accessed by Grange Old Road that is a narrow, short road, with a dangerous 90-degree bend which has no pavements in approximately half of it and is essentially single track for around two thirds of it. The road was annexed from Grange Road many years ago because it was an accident black spot. Currently the junctions of Grange Old Road (which would be essential to access the land), which now receives only minimal traffic, to Grange Road and Blackhorse Hill which are exceptionally busy main thoroughfares, are also accident black spots and are incredibly difficult and dangerous to navigate.

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	Remove allocation RES SA6.4 from the Local Plan.

any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note thatnon-compliance with the duty to co-operate is incapable of modification at examination). You will need to saywhy each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessement 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:	

Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral	Yes
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	

Comment ID	LPSD-121
Person ID	1311754
Include files	
Consultee Name	Dr Fraser M Smith Fraser Smith
Position	
Company / Organisation	
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-SA6.4

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.	Disingenuous in its wording
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
	Policy WS 1.2 – This part of the policy states that developments must have a clear social value. Specifically, "Major development will be required to demonstrate that it is located, designed, constructed and operated in a manner that, where appropriate, delivers net social gain in support of the economic, health and cultural wellbeing of the local community". It is unclear how the proposed development at RES-SA6.4 Land at Grange Hill Farm, West Kirby can fulfil these objectives.  Policy WS 1.2 states that "The rich natural environment of Wirral is protected, enhanced and well connected. Nature is in recovery thanks to the provision of a measurable net gain in biodiversity across the peninsula. The Borough's ability to provide nature-based solutions to manage climate change is increased through a network of high-quality open spaces". It is unclear how proposing a massive housing development such as RES-SA6.4 Land at Grange Hill Farm, West Kirby on a large tract of existing green space that sits directly adjacent to a site of special scientific interest can in any way fulfil this planning objective.

	Viability - 3.58 It does not appear that RES-SA6.4 Land at Grange Hill Farm, West Kirby was assessed for viability by Aspinall Verdi
amplies with the Duty	, , , , , , , , , , , , , , , , , , , ,
omplies with the Duty to co-operate * Yes * No	NO NO
Please give details of why you consider the Local Plan complies 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	Remove allocation RES SA6.4 from the Local Plan.

compliant and sound,in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note thatnon-compliance with the duty to co-operate is incapable of modification at examination). You will need to saywhy each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessement 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.	
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:	
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	

Comment ID	LPSD-122
Person ID	1311754
Include files	
Consultee Name	Dr Fraser M Smith Fraser Smith
Position	
Company / Organisation	
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-SA6.4

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.	Disingenuous
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
	3.108-3.126 Open space, green and blue infrastructure biodiversity and geodiversity - It is unclear how proposing a massive housing development, such as RES-SA6.4 Land at Grange Hill Farm, West Kirby on a large tract of existing green space that sits directly adjacent to a site of special scientific interest can in any way fulfil these extensive planning objective. Council have previously referred to this area as green space and large petition (currently nearly at 1000 sigs) campaigning that it be designated LGS.  3.130 "Landscape Value" – The Draft plan describes in detail the "landscape value" of the Wirral and how any proposed developments should interact with it. It states "Wirral is well known for its mature rural and coastal landscapes, with wooded sandstone ridges and flat, low-lying coastal plains. The Wirral Landscape Character Assessment provides a series of area profiles setting out recommendations for the future management of the key characteristics of each location". We note that there is no detailed description of any assessment of landscape value of RES-SA6.4 Land at Grange Hill Farm, West Kirby. As it stands this large area of land provides key characteristics for the area but these have not been individually assessed.

omplies with the Duty to co-operate * Yes * No	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	Remove allocation RES SA6.4 from the Local Plan.

any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note thatnon-compliance with the duty to co-operate is incapable of modification at examination). You will need to saywhy each modification will make the Local Plan, Sustainability **Appraisal or Habitat** Regulations Assessement 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 Yes, I wish to participate in hearing session(s)

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: 3.108-3.126 Open space, green and blue infrastructure biodiversity and geodiversity - It is unclear how proposing a massive housing development, such as RES-SA6.4 Land at Grange Hill Farm, West Kirby on a large tract of existing green space that sits directly adjacent to a site of special scientific interest can in any way fulfil these extensive planning objective. Council have previously referred to this area as green space and large petition (currently nearly at 1000 sigs) campaigning that it be designated LGS.

3.130 "Landscape Value" – The Draft plan describes in detail the "landscape value" of the Wirral and how any proposed developments should interact with it. It states "Wirral is well known for its mature rural and coastal landscapes, with wooded sandstone ridges and flat, low-lying coastal plains. The Wirral Landscape Character Assessment provides a series of area profiles

	setting out recommendations for the future management of the key characteristics of each location". We note that there is no detailed description of any assessment of landscape value of RES-SA6.4 Land at Grange Hill Farm, West Kirby. As it stands this large area of land provides key characteristics for the area but these have not been individually assessed.
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	Yes

Comment ID	LPSD-123
Person ID	1311754
Include files	
Consultee Name	Dr Fraser M Smith Fraser Smith
Position	
Company / Organisation	
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-SA6.4

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	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Policy WS2 – Page 20 - Major development proposals (over 10 units) must include a social value statement to explain the social benefits that would arise from the development over the lifetime of the development. It is hard to see any conceivable social value of developing this large tract of Green Space at RES-SA6.4 Land at Grange Hill Farm, West Kirby as a large scale housing development.

omplies with the Duty to co-operate * Yes * No	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	remove allocation of RES- SA 6.4

any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note thatnon-compliance with the duty to co-operate is incapable of modification at examination). You will need to saywhy each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessement 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:	

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

Comment ID	LPSD-124
Person ID	1311754
Include files	
Consultee Name	Dr Fraser M Smith Fraser Smith
Position	
Company / Organisation	
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 Site Site Site Site Site Site 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-SA6.4

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 Justified
	Policy WS 5 – This emphasises the importance of Green Space. RES-SA6.4 Land at Grange Hill Farm, West Kirby is one of the last large remaining areas of Green Space in West Kirby that has been protected as such by a restrictive covenant placed in 1985. It is enjoyed as "Green Space" by all users to date. A massive development such as that proposed by RES-SA6.4 Land at Grange Hill Farm, West Kirby, would permanently and irrevocably remove this important area of existing green space.  WS 5.1 Emphasises the importance of "Green and blue networks" i.e the visual amenict yof views where land meets sea. The openness and Green Space of the extensive land at RES-SA6.4 Land at Grange Hill Farm, West Kirby predominantly preserves a large green blue network that could only be destroyed or severely impeded by developing the land.  Policy 5.51 The plan states: "The priorities for West Kirby and Hoylake are to: Maintain and enhance the open aspect of the coastline. Also this states that the plan needs to address the local shortfall in parks and gardens, amenity greenspace, allotments and playing pitches and outdoor sport, through land allocations and Policy WS 5". It is unclear how a massive

development such as that proposed by RES-SA6.4 Land at Grange Hill Farm, West Kirby, would fulfil this planning aim. It will obliterate the currently open aspect of the coastline, would permanently remove a large open space that could be put to alternate uses such as increased allotment areas, recreational area etc.

Policy WS 5.8

"Landscape Character" - RES-SA6.4 Land at Grange Hill Farm, West Kirby does not appear to have been specifically assessed in the described Landscape Character Assessment for the Borough. Policy WS 5.8 does however specifically state that "Development will not be permitted where the visual impact on the local and wider landscape would be inappropriate in terms of character, appearance and landscape setting of the surrounding area". It seems obvious that planning a massive housing development such as that proposed by RES-SA6.4 Land at Grange Hill Farm, West Kirby on one of the last areas of Green Space that provides characteristic landscape and green/blue views does not fulfil this planning objective.

#### omplies with the Duty No 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 thatnon-compliance with the duty to co-operate is incapable of modification at examination). You will need to saywhy each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessement 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	

Comment ID	LPSD-125
Person ID	1311754
Include files	
Consultee Name	Dr Fraser M Smith Fraser Smith
Position	
Company / Organisation	
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-SA6.4

Please state which Policies Map (Inset Map number(s)) this representation relates to. Legally compliant	No
* 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.	Misleading
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 Justified
* 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.	Policy WS6 – This "expects high quality development that contributes positively to existing places and communities in Wirral". Any development, especially one of such massive scale as RES-SA6.4 Land at Grange Hill Farm, West Kirby, in such a large and important tract of remaining "Green Space" cannot ever contribute positively to the existing place or community. WS 6 Describes "Placemaking principles – to help shape a place, connect to existing developments and be successful in and of self to positively contribute to the borough's appearance, range of facilities and vitality". A massive development such as that proposed by RES-SA6.4 Land at Grange Hill Farm, West Kirby, would permanently and irrevocably reverse all of the existing positive placemaking principles that this land currently provies.

omplies with the Duty to co-operate * Yes * No	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	remove allocation of RES - SA 6.4

any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note thatnon-compliance with the duty to co-operate is incapable of modification at examination). You will need to saywhy each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessement 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:	

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

Comment ID	LPSD-126
Person ID	1311754
Include files	
Consultee Name	Dr Fraser M Smith Fraser Smith
Position	
Company / Organisation	
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-SA6.4

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 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 Effective Not Consistent with National Policy
Please give details of	Policy WS 7.2 "Development proposals must take account of the privacy and amenity of the development's users and neighbours". This is of particular relevance to the severe difficulties that will result in relation to traffic access. This is already a known traffic accident hotspot. It will be extremely dangerous if the land is developed as there will be 50-100 additional cars regularly using these very dangerous junctions and also Grange old road which is essentially single track in about 60% with a blind 90 degree bend that was closed/bypassed with Grange Road as it was so dangerous! There is traffic chaos already on Monday nights when a handful of cars pick up and drop off to the sea cadets.

omplies with the Duty to co-operate * Yes * No	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	Remove allocation RES SA6.4 from the Local Plan.

any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note thatnon-compliance with the duty to co-operate is incapable of modification at examination). You will need to saywhy each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessement 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.	
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:	

Notification of Next Stages in Wirral's	Yes
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	

Comment ID	LPSD-127
Person ID	1311754
Include files	
Consultee Name	Dr Fraser M Smith Fraser Smith
Position	
Company / Organisation	
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-SA6.4 Land at Grange Hill Farm, West Kirby

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 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	Not Justified
with National Policy	Delicy WCO. "Development proposed will be expected to accord offsetively and origin and not exact according naturally." DEC CACAL and at Contract 199 Exercises.
	Policy WS9 – "Development proposals will be expected to operate effectively and safely and not create severe impacts to existing networks". RES-SA6.4 Land at Grange Hill Farm, West Kirby. can only be accessed by Grange Old Road that is a narrow, short road, with a dangerous 90 degree bend which has no pavements in approximately half of it and is essentially single track for around two thirds of it. The road was annexed from Grange Road many years ago because it was an accident black spot. Currently the junctions of Grange Old Road (which would be essential to access the land), which now receives only minimal traffic, to Grange Road and Blackhorse Hill which are exceptionally busy main thoroughfares, are also accident black spots and are incredibly difficult and dangerous to navigate.

omplies with the Duty to co-operate * Yes * No	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	Remove allocation RES SA6.4 from the Local Plan.

any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note thatnon-compliance with the duty to co-operate is incapable of modification at examination). You will need to saywhy each modification will make the Local Plan, Sustainability **Appraisal or Habitat** Regulations Assessement 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** Yes, I wish to participate in hearing session(s)

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: Policy WS9—"Development proposals will be expected to ... operate effectively and safely and not create severe impacts to existing networks". RES-SA6.4 Land at Grange Hill Farm, West Kirby. can only be accessed by Grange Old Road that is a narrow, short road, with a dangerous 90 degree bend which has no pavements in approximately half of it and is essentially single track for around two thirds of it. The road was annexed from Grange Road many years ago because it was an accident black spot. Currently the junctions of Grange Old Road (which would be essential to access the land), which now receives only minimal traffic, to Grange Road and Blackhorse Hill which are exceptionally busy main thoroughfares, are also accident black spots and are incredibly difficult and dangerous to navigate.

Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral	Yes
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	

Comment ID	LPSD-128
Person ID	1246556
Include files	LPSD-128-Abbey,Monks and Priory Road_Redacted.pdf
Consultee Name	Ms Lucy Holbrook
Position	Coordinator
Company / Organisation	This is a collective submission from Lucy Holbrook on behalf of the residents of Abbey Road, Monks Way and Priory Road in West Kirby.
Agent ID	
Agent Name	
Position	
Company / Organisation	
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	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.	LGS-SA6.3 Greenfield Estate

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	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	please refer to attachment.  Our Views:  We fully support the draft local plan designation of Greenfield Estate as Local Green Space as legally compliant and sound.  Our Reasons:  West Kirby features prominently in advertising for Merseyside tourism and the number of visitors coming to the village to enjoy the beach, walk to Hilbre Island and spend money in the shops and cafes has increased significantly in the last five years. The majority of those who arrive by car do so down Grange Road. The delightful open aspect of the fields with sheep grazing, mature pine trees and views of the sea and Welsh Hills is their first impression of our community. The site is a peaceful haven for wildlife and the one of the historic features of the site are the rare and well-established ant hills which attract bird life.  For those of us who live here that perspective never ceases to lift our spirits and enhance the privilege of living in such a place. To lose this unique vista to another housing estate would be a major, irreversible loss for residents and visitors.  One aspect of the increase in visitors is the greater volume of traffic using Grange Road at peak times. Extensive development of the site would open a new access way onto a steep hill with poor visibility, requiring additional traffic lights to avoid a traffic hazard. There are already three sets of traffic lights for pedestrian crossings within 500 m of the Greenfields site through the village and traffic currently tails back up past the Greenfield site to the top of the hill from the village centre on a daily basis.  In the Councils Draft UDP the independent consultants decided that this site had the following criteria to be supported as a Local Green Space designation: - Reasonable proximity, beauty, tranquillity, richness in wildlife, local character. We would add that the site also offers historic significance, being the last remaining agricultural fields within the town boundary and fronted by original boundary marker stones and red sandstone walls, a key vi
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	Yes
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 thatnon-compliance with the duty to co-operate is incapable of modification at examination). You will need to saywhy each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessement 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	Yes

Comment ID	LPSD-130
Person ID	1244720
Include files	
Consultee Name	Ms Prue Stothard
Position	
Company / Organisation	
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.	WS1.1
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 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.	Preparation of the Local Plan has not been legally compliant, nor has it concurred with a duty to co-operate because it has not considered the views of the local community in respect to the calculation of housing need. Nor has it considered the opinions of the community's professional experts or witnesses in arriving at its greatly overestimated figure of 13,360 new homes needed up to 2036.  The community has been pointing out to the Council for the previous 5 years that their use of the outdated and discredited 2014 methodology would not furnish accurate, evidence based or objective figures. This advice has not been taken up.  It has ignored the professional opinions of both Professors Ludi Simpson of Manchester University, and Professor David Gregg who calculated that the population of Wirral would be at a standstill over the 15 year period in question. Their statistical calculations are borne out by Wirral Council's own Compendium of Statistics, and by the recent Census figures, which indicate that Wirral's population has only grown by 0.1% between 2011 and 2021.  Furthermore, the Council has not published or documented for the public, how and why it has come to its hugely inflated figure of 13,360 new homes required.  In order to comply with legal obligations, and it's duty to cooperate, the Council will now need to consult with all community interests, residents and their professional representatives, as well as their own Compendium of Statistics, in order to arrive at a revised, realistic appraisal of the numbers of new homes needed, if any.
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

why you consider the Local Plan is unsound. Please be as precise as	The Local Plan does not demonstrate soundness in relation to the incorrect figure for housing need, (see above). It has not been positively prepared because the housing need of Wirral has been miscalculated. Not only is the figure inaccurate, the Council have not taken into account the 1000's of new homes built on Wirral in the last 3 years, with large schemes having been built in Bromborough, in Birkenhead North, and in Rock Ferry and Tranmere. There have also been large new estates built on open green space in Moreton, and in Arrowe Park/Upton. The Local Plan has also not taken into consideration in its calculations for housing the 4,995 empty properties here on Wirral which can be used for housing.  The Plan does not reflect the NPPF on sustainability, as the inflated housing need figures will create a pressure on existing infrastructure, for example water consumption and sewage
	disposal, air and light pollution and increased flooding risk. It will also create pressure on the viability of green belt to provide demarcation between villages, much needed biodiversity and recreational facilities for residents.
	In basing its planning on inflated housing need figures, the Plan has not reflected the crucial need to mitigate climate catastrophe by reducing our carbon footprint, and protecting all green spaces.
	The Plan contradicts the UK Government Climate Change Advisor's Interim Progress Report June 2022 which points out the paucity of agriculture in the UK, and the UN Biodiversity Protection Report May 2019, which recommends that a third of all land and sea should be set aside to protect biodiversity.
	The Wirral has several important sites for conservation and habitat which will come under increased pressure because of the flawed calculations of the Local Plan.
	The remedial action which now need to be taken in order to consider the Local Plan to be sound, is to revisit the housing need calculation, as suggested above. This will produce a figure which better reflects the extremely slow growth of the Wirral population, and will better protect the greenbelt and other valued green spaces across Wirral.
	The Plan should be based on objectively assessed need only.
omplies with the Duty to co-operate * Yes * No	No
Please give details of why you consider the	
Local Plan complies with the duty to co-operate. Please be as precise as possible.	
why you consider the Local Plan fails to	Preparation of the Local Plan has not been legally compliant, nor has it concurred with a duty to co-operate because it has not considered the views of the local community in respect to the calculation of housing need. Nor has it considered the opinions of the community's professional experts or witnesses in arriving at its greatly overestimated figure of 13,360 new homes needed up to 2036.
to co-operate. Please	The community has been pointing out to the Council for the previous 5 years that their use of the outdated and discredited 2014 methodology would not furnish accurate, evidence based or objective
be as precise as possible.	figures. This advice has not been taken up.
•	It has ignored the professional opinions of both Professors Ludi Simpson of Manchester University, and Professor David Gregg who calculated that the population of Wirral would be at a standstill over the 15 year period in question. Their statistical calculations are borne out by Wirral Council's own Compendium of Statistics, and by the recent Census figures, which indicate that Wirral's population has only grown by 0.1% between 2011 and 2021.
	Furthermore, the Council has not published or documented for the public, how and why it has come to its hugely inflated figure of 13,360 new homes required.
	In order to comply with legal obligations, and it's duty to cooperate, the Council will now need to consult with all community interests, residents and their professional representatives, as well as their own Compendium of Statistics, in order to arrive at a revised, realistic appraisal of the numbers of new homes needed, if any.
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 In order to comply with legal obligations, and it's duty to cooperate, the Council will now need to consult with all community interests, residents and their professional representatives, as well as their own Compendium of Statistics, in order to arrive at a revised, realistic appraisal of the numbers of new homes needed, if any. modification(s) you consider necessary The remedial action which now need to be taken in order to consider the Local Plan to be sound, is to revisit the housing need calculation, as suggested above. This will produce a figure to make the Local which better reflects the extremely slow growth of the Wirral population, and will better protect the greenbelt and other valued green spaces across Wirral. Plan legally The Plan should be based on objectively assessed need only. compliant and sound,in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note thatnon-compliance with the duty to co-operate is incapable of modification at examination). You will need to saywhy each modification will make the Local Plan, Sustainability **Appraisal or Habitat** Regulations Assessement legally compliant or sound. It will be helpful if you are able to put forward vour 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:	To clarify any issues in my submission and to provide corroborating evidence
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	Yes

Comment ID	LPSD-131
Person ID	1323313
Include files	LPSD-131-133,135-136,138EM-Johnson 2806_Redacted.pdf
Consultee Name	Mr Karl Johnson
Position	
Company / Organisation	
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	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.	

omplies with the Duty to co-operate * Yes * No	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 thatnon-compliance with the duty to co-operate is incapable of modification at examination). You will need to saywhy each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessement 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	Yes
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	

	L DOD 100
Comment ID	LPSD-132
Person ID	1323313
Include files	LPSD-131-133,135-136,138EM-Johnson 2806_Redacted.pdf
Consultee Name	Mr Karl Johnson
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
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?  * 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
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	
	Many local campaign groups are calling for returning green spaces to food productivity or planted as woodland yet the Council propose building houses on this valuable landBrownfield sites are "previously built on land" not green parks within our towns and villages; these need to be utilised for food production or as wildlife areas. In order to protect Wirral's land of significant biodiverse importance, our green spaces and greenbelt must not be threatened.  There is insufficient evidence that the population of Wirral is increasing. Re furbishing unused office buildings and re-claiming empty housing through compulsory purchasing would provide adequate homes and would be ecologically sound whilst allowing green spaces to be re-wilded or used for food production.

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	Reuse brownfield land for food production or as wildlife areas and reuse empty buildings.

any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note thatnon-compliance with the duty to co-operate is incapable of modification at examination). You will need to saywhy each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessement 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	Yes
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	

Commant ID	LDCD 400
Comment ID	LPSD-133
Person ID	1323313
Include files	LPSD-131-133,135-136,138EM-Johnson 2806_Redacted.pdf
Consultee Name	Mr Karl Johnson
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
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	No
* 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	
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	No
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
why you consider the Local Plan fails to	A peninsula needs to be viewed in terms of an island in regard to bio-diversity as it is connected ecologically very tenuously to the 'outside world'. Restoration of habitats is an important role of the Local Plan Everyone should be able to readily access nature where they live which is not presently the case. Many thousands of Wirrals trees were felled over recent years making huge carbon gains. These cannot be replaced. The commitment to give a "50% increase in tree canopy compared to 2020" is inadequate as so many of Wirral's public trees were felled between 2016 and 2020. Tree planting leads to optimum habitat for biodiversity.  Tree planting leads to optimum habitat for biodiversity.
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	Protect and restore the biodiversity of the Borough.

Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral	Yes
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	

Comment ID	LPSD-134
	E OD TOT
Person ID	1237546
Include files	LSPD-73-134-PDF-ASH-ATTACHMENT-22.06_REDACTED.pdf
Consultee Name	Dr Hilary Ash
Position	Hon Conservation Officer
Company / Organisation	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
Agent ID	
Agent Name	
Position	
Company / Organisation	
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.	
* 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.	Last sentence of M (about sites recently damaged, an ongoing problem - see atatched file). Lack of a definition will be ineffective as it will lead to disputes about what is `recent'

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	M. For effectiveness, this needs to define `recent' as in the Environment Act 2021 (Schedule 14 section 6), which defines it as after January 30th 2020. Also needs to define `appropriate habitat typology' as the assessment will be as in the DEFRA Biodiversity Metric 3 (and subsequent updates to that methodology). See DEFRA Biodiversity Metric 3.0 User Guide p24, Step 3e and p27e about recently-cleared sites. Plan must commit to assessing such recently-cleared sites according to their pre-clearance state.

any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note thatnon-compliance with the duty to co-operate is incapable of modification at examination). You will need to saywhy each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessement 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)	No, I do not 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	Yes
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	

Comment ID	LPSD-135
Person ID	1323313
Include files	LPSD-131-133,135-136,138EM-Johnson 2806_Redacted.pdf
Consultee Name	Mr Karl Johnson
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WP 8.2
Title	Agricultural Land
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 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	No
* 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 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.	The Climate Emergency requires MORE land given to food production not less. Since global food sources are being re-established Wirral needs to play its vital role in securing food production locally. Returning land to regenerative farming practices including, using herbal leys, fixes nitrogen and locks up carbon with 90% less CO2 emissions than using artificial fertilizers.

omplies with the Duty to co-operate * Yes * No	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	Preserve more land for agriculture.

Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral	Yes
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	

Comment ID	LPSD-136
Person ID	1323313
Include files	LPSD-131-133,135-136,138EM-Johnson 2806_Redacted.pdf
Consultee Name	Mr Karl Johnson
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 1.4
Title	Flooding and Drainage
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 1.4
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	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.	The low-lying nature of Wirral's terrain will give rise to extensive flooding despite the lame attempts to stop the rising sea through concrete wall-building.

omplies with the Duty to co-operate * Yes * No	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	

Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral	Yes
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	

Comment ID	LPSD-137
Person ID	1312317
Include files	LSPD-137-EM-Fox-Attachment 1 19.05_Redacted.pdf
Consultee Name	McDonalds
Position	
Company / Organisation	
Agent ID	1323378
Agent Name	Mr Ben Fox
Position	
Company / Organisation	
Number	Policy WD 12
Title	Hot Food and Drink
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 12
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.	
	Not Positively Prepared Not Justified Not Consistent with National Policy
* Not Positively Prepared  * Not Justified  * Not Effective  * Not Consistent with National Policy	
why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer to attachment Policy objections to draft Policy WD12: A. The 400m exclusion zone is inconsistent with national planning policy B. The policy is inconsistent, discriminatory and disproportionate. C. Examination of other plans have found similar policy approaches to be unsound. D. There needs to be further exploration into policies that are more positive, have a reputable evidence base and that comply with the Framework.

	1.3 In summary, Planware Ltd consider there is no sound justification for a policy such as Policy In summary, Planware Ltd consider there is no sound justification for a policy such as Policy WD12, Point B, which imposes a blanket ban on restaurants that include an element of hot food takeaway "within 400-metres walking distance of a school." Point B is unsound it should be deleted from the plan. "
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	Delete - which imposes a blanket ban on restaurants that include an element of hot food takeaway "within 400-metres walking distance of a school."

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	

Comment ID	LPSD-138
Person ID	1323313
Include files	LPSD-131-133,135-136,138EM-Johnson 2806_Redacted.pdf
Consultee Name	Mr Karl Johnson
Position	
Company / Organisation	
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 give details of why you consider the Local Plan is any possible.   Please give details of why you consider the Local Plan is not sound, Please as possible.   Please give details of why you consider the Local Plan is not sound, Please be as practice as a possible.   Please give details of why you consider the Local Plan is not sound, Please be as practice as a possible.   Please give details of why you consider the Local Plan is not sound, Please be as practice as a practice as a possible.   Please give details of why you consider the Local Plan is not sound, Please be as practice as a pra		
Please give details of why you consider the Cocal Plan is sound. Please give details of why you consider the Cocal Plan is sound. Please give details of why you consider the Local Plan is sound. Please precise as precise as possible.  No Please possible.  No Please precise as possible.  No Positively Prepared No Positively Prepared No Positively Prepared No Local Plan is not the Plan	Policies Map (Inset Map number(s)) this representation	
why you consider the Local Plan is precise as precise as possible.  Please give details of why you consider the Local Plan is not sound, please be as precise as possible.  Please give details of why you consider the Local Plan is not sound, please be indicate the reason(s) why:  **No  **No  No  No  No  No  No  No  No	* Yes	No
why you consider the Local Plan is not legally compliant. Please be as precise as possible.  Sound  Yes No Please give details of why you consider the Local Plan is not sound, please indicate the reason(s) why: No Positively Prepared  Not Effective Not Positively Prepared Not Effective Not Consider that Not Positive Prepared Not Not Effective Not Not Effective Not Positive Prepared Not Not Effective Not Not Not	why you consider the Local Plan is legally compliant. Please be as precise as	
* Yes * 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 not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Officitively Prepared * Not Officitively Prepared * Not Officitively Prepared * Not Greater that with National Policy * Not Consistent with National Policy  * Not Consistent with National Policy  * Not Officitively Prepared * Not	why you consider the Local Plan is not legally compliant. Please be as precise	
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 Stiffective  * Not Consistent with National Policy  Please give details of why you consider the Local Plan is unsound. Please be as precise as so recise as sprecise as	* Yes	No
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 sprecise as	why you consider the Local Plan is sound. Please be as precise	
why you consider the Local Plan is unsound. Please be as precise as  global food sources are being re-established Wirral needs to play its vital role in securing food production locally	the Local Plan is not sound, please indicate the reason(s) why:  * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National	
	why you consider the Local Plan is unsound. Please be as precise as	global food sources are being re-established Wirral needs to play its vital role in securing

omplies with the Duty to co-operate * Yes * No	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	

Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral	Yes
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	

Comment ID	LPSD-139
Person ID	1312318
Include files	LPSD-139-EM-Little-20.05-No Attachment_Redacted.pdf
Consultee Name	Mr Gary Little
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
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?  * 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
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	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	I fully support the council's brownfield only policy as clearly the borough's housing needs can be fully met via the housing supplied on brownfield sites only. There is no need to release any greenbelt land and this should be protected at all costs.
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	Yes
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 thatnon-compliance with the duty to co-operate is incapable of modification at examination). You will need to saywhy each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessement 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)	No, I do not 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
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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

Comment ID	LPSD-140
Person ID	1323288
Include files	LPSD-140-EM-Barnes 1506_Redacted.pdf
Consultee Name	Ms Heather Barnes
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WP 1.2
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 1.1

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 * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	objection to allocation, including access see attached.

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	removal of allocation RES SA1.1

Notification of Next
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Preparation - Would
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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

Comment ID	LPSD-141
Person ID	1312321
Include files	LPSD-141-EM-Marsden-24.05_Redacted.pdf
Consultee Name	Mr Gavin Marsden
Position	
Company / Organisation	
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-SA6.10

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	
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.	

omplies with the Duty to co-operate * Yes * No	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.	Twice now there has been a planning application for some houses in the garden of a private dwelling on Birkenhead Road adjacent to St. John's Close the bungalows.  Several objections were received mainly on the grounds that it is a flood plain and floods all winter, where would that water go? Towards the adjacent houses? Also on grounds that would present additional traffic on a dangerous blind corner on Birkenhead Road.  It was rejected twice. Correct decision in my view. Imagine my shock when I saw the above named private dwelling on the strategic local plan for the Wirral. A plan that is an important document that shows where people can build and why. It is about ensuring that local infrastructure is there in support of additional houses, affordability etc. You detail the key themes in your document.  All info is at odds with placing a private dwelling on the plan. I am shocked that the private dwelling on Birkenhead road next to St John's Close appears on a strategic plan having been twice rejected at planning stage due to local environment and traffic issues.  How can a private dwelling feature that will only line the pockets of the owners and builders??? And cause difficulties for elderly neighbours in St John's? I cannot see anything strategic or visionary about this. If the local plan said that, in time, homes on St John's Close were going be purchased and replaced by zero carbon dwellings, I can see the strategy and vision.  But to include a private dwelling in a local plan is simply appalling. I will be consulting a neighbour with flood knowledge who has already submitted objections due to ground water. If all the brick wall lined gardens become unstable or our houses start subsiding there will be a lot of v upset local people.  It feels like it is being pushed through under the radar.
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 thatnon-compliance with the duty to co-operate is incapable of modification at examination). You will need to saywhy each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessement 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

Comment ID	LPSD-142
Person ID	1312523
Include files	LPSD-142-EM-Harries 1606_Redacted.pdf
Consultee Name	Robert Harries
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WP 5.1
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-SA5.4

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	
	A stipulation was made on the deeds that a part of the land was to be kept in perpetuity as playing fields. site access needs to be from Digg Lane

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	

Notification of Next
Stages in Wirral's
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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

Comment ID	LPSD-143
Person ID	1323311
Include files	LPSD- 143-EM-Brunsden 2706_Redacted.pdf
Consultee Name	Mr Tim Brunsden
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy RA 10
Title	New Brighton Regeneration Area
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.	RA 10
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 Justified
* Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
	My main concern for the plans is the long term vision for New Brighton as a destination place. It looks like there has been a decision to move away from the 'kiss me quick' heritage and replace it with housing built by private developers, with the aim to construct good quality housing in the area.  There's a danger here is some seaview apartments with shop units under them filled with Tesco Extra and Costa Coffee - a good deal for developers, but not bringing anything special to New Brighton other than a 'clone town' feeling.  Whatever you think about the Marine Point development (and I don't think it's too bad), but it is a large piece of land now owned by some shareholders in London who just want an annual return on their investment. I counted 5 empty units there at the moment - the planting around it is the same as you see around motorways, which needs minimum maintenance - there's no community planting because it's privately owned.

	It feels like something that would not be out of place on Speke industrial estate, rather than New Brighton's waterfront and by that, I mean in the buildings design and use - no one is going
	to be taking a selfie outside of it.
	I know we are in difficult times, but there are other sustainable models.
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	needs a vision as a seaside resort in the regeneration plans

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 thatnon-compliance with the duty to co-operate is incapable of modification at examination). You will need to saywhy each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessement 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.	
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:	
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	Yes

Comment ID	LPSD-145
Person ID	1323309
Include files	LPSD- 145- EM-Wilson-1205_Redacted.pdf
Consultee Name	Mr Martin Wilson
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy RA 1
Title	Seacombe River Corridor Regeneration Area
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.	RA 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	Not Positively Prepared
Policy Please give details of	Personally i do not agree with the building being built on the corner of 3 Seacombe promenade. Due to the potential view being blocked over the River Mersey. I am not declaring flats/houses shouldn't be built i am just asking for you to have a local resident vote over these matters.

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	

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2021-2037? (namely
submission of the
Plan for examination,
publication of the Inspector's
recommendations
and adoption of the
Plan).

\* Yes
\* No

Comment ID	LPSD-147
Person ID	1312452
Include files	LPSD-147- EM-Storey 1406-Redacted.pdf
Consultee Name	Mr. Paul Storey
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
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?  * 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.	WS1.1
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	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	I support the Council's Brownfield only policy contained within the Local Plan.  The Council has demonstrated the Borough's housing needs can be met via the housing supplied on brownfield sites across the Borough. There is no need to release any Green Belt land.  Please protect our greenbelts against the likes of Leverhulme who only have greed at the heart of their plans.  Do the right thing WBC and create a great legacy for this and our future generations.
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	

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submission of the
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publication of the Inspector's
recommendations
and adoption of the
Plan).

\* Yes
\* No

Comment ID	LPSD-148
Person ID	1312420
Include files	LPSD 148, 210-EM-Dean-02.06_Redacted.pdf
	Ms. Amanda Dean
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WP 1.2
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 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-SA1.2

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
	I am emailing concerning building on land at and behind Gibson House. Me and all my neighbours including everyone I have spoken on Seabank rd are completely against any more building on this land. This was a beautiful site with a lovely old building on it and ancient trees. The lovely green, grassy hill behind it and the gardens were full of nature (foxes, bats etc) and used by the public and wildlife for many years. The hill is a beautiful place to picnic and look out to sea, and is used by many families and dog walkers. The ancient trees which have now gone were beautiful to look out on from my flats, as was the old building. Now the site and houses are an eyesore!!!! The plans include more high flats, all concrete around site, and plans to build even more monstrosities on the grassy hill!!! This wasn't what people on seabank rd were informed of and we are not happy with plans. The council seem to want to build on any piece of land they can find and us as residents can't seem to do anything about it!!! I am representing the local Egremont area (I haven't spoken to lot's of people) and saying that we are against any more building on Gibson Park. Yours faithfully, ADean [address redacted]

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	remove allocations, object to sites. land at and behind Gibson House.

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publication of the
Inspector's
recommendations
and adoption of the
Plan).
\* Yes
\* No

Comment ID	LPSD-149
Person ID	1323314
Include files	LPSD-149 -EM-Dembski Att 1_Redacted.pdf
Consultee Name	Dr Sebastian Dembski
Position	Planning, Campaigns and Policy Lead
Company / Organisation	Merseyside Civic Society
Agent ID	
Agent Name	
Position	
Company / Organisation	
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?  * 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.	WS1.1
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	Yes
why you consider the Local Plan is sound. Please be as precise as possible.	Merseyside Civic Society (MCS) is wishing to respond to the consultation on the submission draft of the Wirral Local Plan. Founded in 1938, we campaign to preserve the best of our existing buildings and spaces and to insist on good quality design for our new ones.  We want to express our strong support for the overarching strategy aiming to promote regeneration of the 'Left Bank', in particular Birkenhead, and to protect the Wirral green belt.  MCS had previously commented positively about the Birkenhead 2040 regeneration framework in April 2021, highlighting the progressive character of the plan that will hopefully transform the town.  We are glad to see that some projects are already progressing such as the Dock Branch Park.  We have also strongly argued against relaxation of the green belt in response to the proposals by the Leverhulme Estate which would see significant parts of the green belt disappear and would see low-density residential development with poor public transport connectivity that can only be described as unsustainable.  The green belt is an important asset for the whole borough, parts of which, such as coastal areas and land managed for amenity by the National Trust and the Council, have substantial recreational and biodiversity value. However far more needs to be done to manage these areas and other parts of the green belt effectively, given the intensive pressures they have to accommodate.
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 thatnon-compliance with the duty to co-operate is incapable of modification at examination). You will need to saywhy each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessement 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	

Comment ID	LPSD-150
Person ID	1243420
Include files	LPSD-150-EM-Jones F1 of 3 0807_Redacted.pdf LPSD-150,151,155-EM-Jones Attach1 0807_Redacted.pdf
Consultee Name	Alan Jones
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 5.3
Title	Outdoor Sports Provision
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 5.3
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 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.	Policies GI 1.1 Playing Pitch and Outdoor Sport Strategy & Action Plan; July 2021 and GI 1.2 Playing Pitch & outdoor Sports Strategy Assessment Report; July 2021 These are based on a Consultant's Report which is not sound as it is not consistent with National Policy. They are not positively prepared because it makes no recommendation for much-needed enhancement of facilities for some sports. The National Planning Policy Framework (NPPF) requires planning policies which are based on robust and up-to-date assessment of the needs for sports and recreation facilities. However, GI 1.1 Playing Pitch and Outdoor Sport Strategy & Action Plan; July 2021 'Agreed Scope' only covers 6 sports. GI 1.2 Playing Pitch & outdoor Sports Strategy Assessment Report therefore only covers these 6 sports. Hence, some sports which do not have a good facility at present have not been considered. Most of these sports will have a need for a facility which is not being addressed. They will therefore continue to be deprived until 2037 at least. This includes Snow-sports, Cycling and Mountaineering (which includes rambling and rock climbing), all

of which are enjoyed by a very large part of the population. To comply with Policy WS 5.3 a wider range of sport facilities are needed to provide for a growing number of participants in a wide range of sports. The developers in the best position to assist are Peel Holdings. They are known to be keen on developing links with existing cycle routes and Bidston Moss. Their plans for Wirral Waters also include provision of leisure facilities which could accommodate a snow-sports facility.

#### Snow-sports

Merseyside is second only to London as a large conurbation without an adequate snow-sport facility. In the absence of natural snow, a good artificial facility is required. One way in which this might be achieved, in pursuance of WS 5.3 is shown in the attached discussion paper, D New Snowsport Facility Wirral.docx.

The Consultants should have referred to Snowsport England and GB Snowsport to assess the needs of the various snow-sport disciplines.

#### Cycling

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As far as I know, there is little provision for off-road cycling, in its various forms, in Wirral. Whilst there is a rather poor cycle and walking circuit at Bidston Moss, the nearest good closed-circuit cycle track is at UCLAN, Preston. These circuits are also of interest to cross country skiers as they practice on roller skis when snow is not available (which it rarely is in Wirral).

There is a network of designated cycle routes in Wirral, the main one of which is Route 56 which extends to Chester and beyond. Unfortunately, these are not all off-road.

The consultants should have referred to British Cycling to assess all the diverse needs of the sport.

#### Mountaineering

As this includes rambling, the strategy should assess the network of public pathways in Wirral. The Ramblers' Association could probably assist with this.

Whilst there are no mountains in Wirral, there are a number of disused quarries where rock climbing techniques can be practiced. These should be reviewed to ensure access is maintained. These days, there is also a demand for artificial climbing walls.

The consultants should have referred to British Mountaineering Council (BMC) to assess all the diverse needs of mountaineers which should be taken into account in Wirral's planning.

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	

1	
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	In order to make the plan 'Sound', if will be necessary to engage new consultants to reassess the needs of all sports in consultation with the Governing Bodies of each sport for inclusion in GI 1.1 and GI 1.2. A firm of Sports Consultants would be more appropriate than a firm of Management Consultants.
compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note thatnon-compliance with the duty to co-operate is incapable of modification at examination). You will need to saywhy each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessement 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	No, I do not wish to participate in hearing session(s)

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	Yes