

LPSP-1051

Comment ID	LPSP-1051
Person ID	1237833
Include files	LPSP-1048-61-EM-Harding Attach 2507_Redacted.pdf
Consultee Name	Joanne Harding
Position	Planning Manager – Local Plans North
Company / Organisation	Home Builders Federation
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 3.2
Title	Housing Density
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.2
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>Please refer to attachment.</p> <p>The HBF generally supports the Council in setting a density policy, making efficient use of land and making as much use as possible of previously developed land (PDL) in accordance with NPPF13. However, the HBF considers that it is important to ensure that the prioritisation of higher density development and the use of PDL does not preclude the delivery of homes in sustainable locations to meet local needs.</p> <p>The Wirral Density Study states that in developing the density policy , it will need to be accepted that some changes to local character will occur when implementing minimum densities, especially in the areas where a significant uplift may occur. A balance needs to be taken between these changes and establishing higher densities. The HBF considers that there will be a need to ensure that the local character is not lost due to the emphasis on establishing higher densities</p>

	<p>Traditional policy approaches to parking, open space and even amenity may need to be considered in a different way on some of the higher density developments. The HBF is concerned that these key elements of a successful and sustainable development are potentially going to be overlooked in order to provide a denser development. The Council will need to give significant consideration to whether this need for greater density is sufficient to overlook the need to protect resident's amenity or provision of normal residential facilities</p> <p>The HBF is concerned that sufficient consideration has not been given to other policy requirements which may also impact on density and site layout including the use of the M4(2) and M4(3) standards, the nationally described space standards (NDSS) (although briefly mentioned in the Study the potential impact on density is not evidenced), provision of cycle and bin storage, the mix of homes provided, the availability of EV Charging alongside parking, any implications of design coding and the provision of tree-lined streets, highways requirements, and the requirements in relation to Biodiversity Net Gain, changes to the Building Regulations requirements in relation to heating and energy and the Future Homes Standard. The HBF is concerned that in order to achieve the densities proposed the Council may not be able to deliver on a number of these other policy requirements. The HBF considers that it would be beneficial to reconsider the reality of the density requirements alongside the impacts of all of the Council's policy requirements and Government policy</p> <p>The HBF is also concerned that the use of higher densities has implications for the type, size and tenure of the homes provided and may mean that the Council is not always able to provide an appropriate housing mix across the Council area. This may mean that the homes delivered do not meet the housing needs of the local community or the market demand in the area.</p>
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the	

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

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

Comment ID	LPSD-1052
Person ID	1237833
Include files	LPSD-1048-61-EM-Harding Attach 2507_Redacted.pdf
Consultee Name	Joanne Harding
Position	Planning Manager – Local Plans North
Company / Organisation	Home Builders Federation
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 3.3
Title	Affordable Housing Requirements
To which part of the Local Plan does this representation relate?	Policy
* Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.3
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>Please refer to attachment</p> <p>the HBF supports the need to address the affordable housing requirements of the borough. The NPPF is, however, clear that the derivation of affordable housing policies must not only take account of need but also viability and deliverability.</p> <p>The HBF is concerned that the schemes that are being identified as not viable are those where the Council is seeking to focus its development.</p> <p>The Council should be mindful that it is unrealistic to negotiate every site on a one-by-one basis because the base-line aspiration of a policy or combination of policies is set too high as this will jeopardise future housing delivery. The HBF considers it will be important for the Council to consider all the potential options for delivering affordable housing, not just through market developments.</p>

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

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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LPSP-1053

Comment ID	LPSP-1053
Person ID	1237833
Include files	LPSP-1048-61-EM-Harding Attach 2507_Redacted.pdf
Consultee Name	Joanne Harding
Position	Planning Manager – Local Plans North
Company / Organisation	Home Builders Federation
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 3.4
Title	Housing Mix
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.4
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>The HBF recommends a flexible approach is taken regarding housing mix which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location. However, it is not clear from this policy how all new residential developments will be able to address the mix of housing particularly where this is a small site for example. It is also not clear how the needs for older people or specialist housing can be addressed on all sites or how it will be determined whether it is appropriate</p> <p>The HBF considers that flexibility in this policy will be important, as there are some concerns how this policy will sit alongside other policy requirements such as the housing density requirements, which may be difficult to achieve with significant numbers of larger homes, and the optional housing standards which may lead to viability issues where significant numbers of 3-bed or more homes are provided</p>

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

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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LPSD-1054

Comment ID	LPSD-1054
Person ID	1237833
Include files	LPSD-1048-61-EM-Harding Attach 2507_Redacted.pdf
Consultee Name	Joanne Harding
Position	Planning Manager – Local Plans North
Company / Organisation	Home Builders Federation
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 3.5
Title	Self-Build and Custom Build Housing
To which part of the Local Plan does this representation relate?	Policy
* Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.5
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	The HBF would be keen to understand the evidence to support the need for custom and self-build housing in Wirral, and how it has informed the requirements of Policy WS3.5. The HBF does not consider that the Council has appropriate evidence to support the requirement for developers on sites of more than 50 dwellings to provide service plots for custom or self-build housing. The HBF is concerned that as currently proposed this policy will not assist in boosting the supply of housing and may even limit the deliverability of some sites and homes. The HBF is also not clear whether there is even a demand from custom and self-builders to live on sites within a larger residential development scheme.

<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
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<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</p>	<p>The HBF considers that alternative policy mechanisms could be used to ensure a reliable and sufficient provision of self & custom build opportunities across the Borough including allocation of small and medium scale sites specifically for self & custom build housing and permitting self & custom build outside but adjacent to settlement boundaries on sustainable sites especially if the proposal would round off the developed form.</p>

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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LPSP-1055

Comment ID	LPSP-1055
Person ID	1237833
Include files	LPSP-1048-61-EM-Harding Attach 2507_Redacted.pdf
Consultee Name	Joanne Harding
Position	Planning Manager – Local Plans North
Company / Organisation	Home Builders Federation
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 5.4
Title	Ecological Networks
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 5.4
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>Please refer to attachment</p> <p>The HBF considers that the Council should not deviate from the Government's proposals on biodiversity gain as set out in the Environment Act and the emerging regulations. This legislation and accompanying regulations will require development to achieve a net gain for biodiversity. This nationally required gain provides certainty in achieving environmental outcomes, deliverability of development and costs for developers. The mandatory national requirement will not be a cap on the aspirations of developers who want to voluntarily go further. The mandatory requirement offers developers a level playing field nationally and reduced risks of unexpected costs and delays</p> <p>The requirement for a 20% net gain in biodiversity on Council owned land is not sound. No robust justification has been provided as to why these parts of the Wirral are any different to the rest of the country and should set a higher requirement for net biodiversity gains from new development. If Government considers 10% sufficient to mitigate the impact of new</p>

	<p>development in future, then this should also be an appropriate level of net gain for the Wirral. It is important to recognise that the Environment Act does not set this as a minimum and at present there is no suggestion that in future policy will allow for a higher requirement to be set in local plans.</p> <p>The HBF also has concerns that the impact of a 20% requirement has not been fully considered. A 20% requirement will have a more considerable cost impact than is suggested in the CIL and Viability Assessment Study and one that could impact on the deliverability of some sites. The Viability Assessment only includes a cost of £244 per unit for brownfield sites and £1,027 per unit for greenfield sites.</p> <p>The HBF considers that the costs should be updated to reflect current costs, and that the policy will need to consider whether these assumptions are correct given the other policies included within the Plan such as the density requirements, and the increased requirement for 20% net gain on Council owned land. The Government biodiversity net gain impact assessment identifies considerably higher costs for net gain if Scenario C is used, this scenario considers the use of biodiversity credits and off-site provisions.</p>
<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations</p>	

<p>Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>The HBF considers that this element in relation to the biodiversity net gain requirements is not necessary and provides unnecessary duplication. If the policy is to be retained, then the HBF recommends that the policy is amended to ensure that it reflects the 10% net gain approach established in the Environment Act, not 20% for Council owned land.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in</p>	<p>Yes, I wish to participate in hearing session(s)</p>

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

Comment ID	LPSD-1056
Person ID	1237833
Include files	LPSD-1048-61-EM-Harding Attach 2507_Redacted.pdf
Consultee Name	Joanne Harding
Position	Planning Manager – Local Plans North
Company / Organisation	Home Builders Federation
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 8.2
Title	Sustainable Construction – Energy Efficiency, Overheating and Cooling, and Water Usage
To which part of the Local Plan does this representation relate?	Policy
* Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 8.2
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>Please refer to attachment.</p> <p>Whilst the Council's policy approach in WS8.2 is commendable, it should not undermine the Government's intention to set energy efficiency standards through the Building Regulations. ... inclusion of Passivhaus standards is unsound and reference to it should be deleted.....certification is not necessary and ineffective...If the Council, consider it necessary to refer to the Passivhaus standard it should do so in terms of providing encouragement for those developers that wish to build to this standard in the supporting text.</p> <p>This policy goes on to state that all development should seek to identify water usage efficiencies, including consideration of rainwater harvesting and water recycling systems. The HBF considers that this policy has potential implications in terms of space that may be required to allow for harvesting and this will need to be considered in relation to other policies requirements.</p>

	The HBF considers that this policy could support the provision of water harvesting and use of grey water rather than making any requirements, allowing for flexibility in provision depending on circumstances
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	requiring development to be certified to Passivhaus standards is not necessary and is ineffective and should be deleted. The HBF considers the inclusion of the Passivhaus standards within this policy to be unsound and reference to it should be deleted. policy could support the provision of water harvesting and use of grey water rather than making any requirements, allowing for flexibility in provision depending on circumstances.

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

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

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

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

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

Comment ID	LPSD-1057
Person ID	1237833
Include files	LPSD-1048-61-EM-Harding Attach 2507_Redacted.pdf
Consultee Name	Joanne Harding
Position	Planning Manager – Local Plans North
Company / Organisation	Home Builders Federation
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 8.6
Title	Heat and Power Networks
To which part of the Local Plan does this representation relate?	Policy
* Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS8.6
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>Please refer to attachment</p> <p>The Council should consider the Department for Business, Energy and Industrial Strategy consultation on Heat Networks: Building A Market Framework (ended on 1st June 2020). To meet the Government's legal commitment on reducing greenhouse gas emissions virtually all heat in buildings will require decarbonising. Heat networks are one aspect of the path towards decarbonising heat, however currently the predominant technology for district-sized communal heating networks is gas combined heat and power (CHP) plants. Over 90% of district networks are gas fired. As 2050 approaches, meeting the Government's climate target of reducing greenhouse gas emissions to net zero will require a transition from gas-fired networks to renewable or low carbon alternatives such as large heat pumps, hydrogen or waste-heat recovery but at the moment one of the major reasons why heat network projects do not install</p>

	<p>such technologies is because of the up-front capital cost. The Council should be aware that for the foreseeable future it will remain uneconomic for most heat networks to install low carbon technologies.</p> <p>some heat network consumers do not have comparable levels of satisfaction as consumers on gas and electricity networks, and they pay a higher price. Currently, there are no sector specific protections for heat network consumers, unlike for people on other utilities such as gas, electricity or water. A consumer living in a building serviced by a heat network does not have the same opportunities to switch supplier as they would for most gas and electricity supplies. All heat network domestic consumers should have ready access to information about their heat network, a good quality of service, fair and transparently priced heating and a redress option should things go wrong. Research by the Competition and Markets Authority (CMA) found that a significant proportion of suppliers and managing agents do not provide pre-transaction documents, or what is provided contains limited information, particularly on the on-going costs of heat networks and poor transparency regarding heating bills, including their calculation, limits consumers' ability to challenge their heat suppliers reinforcing a perception that prices are unjustified. The monopolistic nature of heat networks means that future price regulation is required to protect domestic consumers. The CMA have concluded that "a statutory framework should be set up that underpins the regulation of all heat networks." They recommended that "the regulatory framework should be designed to ensure that all heat network customers are adequately protected. At a minimum, they should be given a comparable level of protection to gas and electricity in the regulated energy sector." The Government's latest consultation on heating networks proposes a regulatory framework that would give Ofgem oversight and enforcement powers across quality of service, provision of information and pricing arrangements for all domestic heat network consumers.</p>
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the	

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

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

LPSP-1058

Comment ID	LPSP-1058
Person ID	1237833
Include files	LPSP-1048-61-EM-Harding Attach 2507_Redacted.pdf
Consultee Name	Joanne Harding
Position	Planning Manager – Local Plans North
Company / Organisation	Home Builders Federation
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 8.8
Title	Climate Change and Energy Statement
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 8.8
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer to attachment. The HBF considers that requirements for an Energy and Climate Statement including Whole Life Cycle Carbon Emission Assessment are unnecessary. The HBF would query the need to consider the whole life cycle emissions. These emissions are related to the materials and products that go into making our buildings and infrastructure and are likely to include emissions caused by: extraction, processing and manufacture; transport, assembly and installation on site; replacement, refurbishment and maintenance; demolition and disposal. Therefore, they are much wider than just the development industry and are not under the control of the applicant and may be difficult to detail or to influence, or for either the applicant or the Council to monitor

<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</p>	<p>if the Council does decide to go ahead with this requirement it should ensure that the requirement is not overly onerous and is proportionate to the scale of the development for example, the smallest companies may not have the in-house resources to carry out assessments, and it is important that there is a diverse range of companies operating within the house building industry. The HBF considers that a transitional period prior to introducing any policy in relation to the whole life cycle would be necessary to give the industry time to consider how assessment would be undertaken and how data would be collected and collated.</p>

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-1059
Person ID	1237833
Include files	LPSD-1048-61-EM-Harding Attach 2507_Redacted.pdf
Consultee Name	Joanne Harding
Position	Planning Manager – Local Plans North
Company / Organisation	Home Builders Federation
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 9.3
Title	Servicing Development
To which part of the Local Plan does this representation relate?	Policy
<ul style="list-style-type: none"> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment 	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 9.3
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer to Attachment The HBF considers that now that the Building Regulations are in place in relation to charging points the Council does not need to introduce their own alternative requirements which are over and above these which may create confusion and unnecessary duplication of requirements

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

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-1060
Person ID	1237833
Include files	LPSD-1048-61-EM-Harding Attach 2507_Redacted.pdf
Consultee Name	Joanne Harding
Position	Planning Manager – Local Plans North
Company / Organisation	Home Builders Federation
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 10.2
Title	District Heat 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 10.2
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>Please refer to attachment</p> <p>The HBF does not consider it is necessary to make more connections to the heat network. Heat networks are one aspect of the path towards decarbonising heat, however currently the predominant technology for district-sized communal heating networks is gas combined heat and power (CHP) plants. Over 90% of district networks are gas fired. As 2050 approaches, meeting the Government's climate target of reducing greenhouse gas emissions to net zero will require a transition from gas-fired networks to renewable or low carbon alternatives such as large heat pumps, hydrogen or waste-heat recovery but at the moment one of the major reasons why heat network projects do not install such technologies is because of the up-front capital cost. The Council should be aware that for the foreseeable future it will remain uneconomic for most heat networks to install</p>

	<p>low-carbon technologies.</p> <p>Furthermore, some heat network consumers do not have comparable levels of satisfaction as consumers on gas and electricity networks, and they pay a higher price. Currently, there are no sector specific protections for heat network consumers, unlike for people on other utilities such as gas, electricity or water. A consumer living in a building serviced by a heat network does not have the same opportunities to switch supplier as they would for most gas and electricity supplies. All heat network domestic consumers should have ready access to information about their heat network, a good quality of service, fair and transparently priced heating and a redress option should things go wrong. Research by the Competition and Markets Authority (CMA) found that a significant proportion of suppliers and managing agents do not provide pre-transaction documents, or what is provided contains limited information, particularly on the on-going costs of heat networks and poor transparency regarding heating bills, including their calculation, limits consumers' ability to challenge their heat suppliers reinforcing a perception that prices are unjustified. The monopolistic nature of heat networks means that future price regulation is required to protect domestic consumers. The CMA have concluded that "a statutory framework should be set up that underpins the regulation of all heat networks." They recommended that "the regulatory framework should be designed to ensure that all heat network customers are adequately protected. At a minimum, they should be given a comparable level of protection to gas and electricity in the regulated energy sector." The Government's latest consultation on heating networks proposes a regulatory framework that would give Ofgem oversight and enforcement powers across quality of service, provision of information and pricing arrangements for all domestic heat network consumers</p>
<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in</p>	

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

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

Comment ID	LPSD-1061
Person ID	1237833
Include files	LPSD-1048-61-EM-Harding Attach 2507_Redacted.pdf
Consultee Name	Joanne Harding
Position	Planning Manager – Local Plans North
Company / Organisation	Home Builders Federation
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WD 18
Title	Health Impact 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.	WD18
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer to attachment The requirement for all major residential developments of 10 or more dwellings to undertake a Health Impact Assessment (HIA) is unnecessary and an additional burden on applicants. the HBF recognises the importance of ensuring new development supports the wider aims of local authorities and their partners to improve the health and well-being of their residents and workforce. However, the requirement for all major residential developments of 10 or more dwellings to undertake a Health Impact Assessment (HIA) is unnecessary and an additional burden on applicants.

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

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-1063
Person ID	1248833
Include files	LPSD-628, 1063-1065 and 1408-EM-Storey Attach 3 of 8 2507_Redacted.pdf
Consultee Name	Mr Philip Galvin
Position	
Company / Organisation	
Agent ID	1248751
Agent Name	Mr Jonathan Storey
Position	Senior Planner
Company / Organisation	Pegasus Group
Number	Policy WS 1
Title	The Development and Regeneration Strategy for Wirral 2021 - 2037
To which part of the Local Plan does this representation relate? * 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
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment The Council have not provided any evidence to justify the quantity of development that can be delivered in Regeneration Areas along with associated infrastructure within the Plan period. The delivery strategy does not take a realistic view on the economic viability issues that are present on the majority of allocated sites. Insufficient evidence has been supplied to prove the viability of these major regeneration sites be it through grant funding or otherwise. If found to be unsound, further consideration would need to be given to housing growth on viable and deliverable sites elsewhere in the Borough. This would act as an exceptional circumstance to justify Green Belt Release

<p>as precise as possible.</p>	<p>Council have not provided any evidence to justify the spatial distribution of homes and the negligible number of homes directed to Settlement Area 7, and thus that the spatial distribution of homes is sound – the resulting claim that exceptional circumstances do not exist to alter the Green Belt boundaries has not been justified. If found to be unsound, further consideration would need to be given to the planned number of homes in Settlement Area 7, to ensure that they address the needs of this area over the plan period. This would be an exceptional circumstance to amend the extent of the Settlement Area boundary to encompass land otherwise within the Green Belt.</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in</p>	

<p>relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>If found to be unsound, further consideration would need to be given to housing growth on viable and deliverable sites elsewhere in the Borough. This would act as an exceptional circumstance to justify Green Belt land release.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? * No, I do not wish to participate in</p>	

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-1064
Person ID	1248833
Include files	LPSD-628, 1063-1065 and 1408-EM-Storey Attach 3 of 8 2507_Redacted.pdf
Consultee Name	Mr Philip Galvin
Position	
Company / Organisation	
Agent ID	1248751
Agent Name	Mr Jonathan Storey
Position	Senior Planner
Company / Organisation	Pegasus Group
Number	Policy WP 7.2
Title	Residential Sites
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WP7.2
Please state which Site ID/Reference this	

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

<p>as precise as possible.</p>	<p>If found to be unsound, more sites would be required in the housing supply to address housing needs, including affordable housing needs which could be delivered during the middle and latter end of the plan period. This is an exceptional circumstance to alter Green Belt boundaries in this area and identify sites which currently lie on the edge of the Settlement Area to boost the supply of homes. The Council have not provided any evidence to justify the limited housing growth planned in Settlement Area 7, and thus that the Development and Regeneration Strategy is not sound –the resulting claim that exceptional circumstances do not exist to alter the Green Belt boundaries has not been justified. If found to be unsound, further consideration would need to be given to housing growth needed within Settlement Area 7, to ensure the Development and Regeneration Strategy is sound. If more housing growth is required, this would be an exceptional circumstance to amend the extent of the Settlement Area boundary to encompass land otherwise within the Green Belt.</p> <p>The Council have not provided any evidence to justify the spatial distribution of homes and the negligible number of homes directed to SettlementArea7, and thus that the spatial distribution of homes is sound –the resulting claim that exceptional circumstances do not exist to alter the Green Belt boundaries has not been justified. If found to be unsound, further consideration would need to be given to the planned number of homes in Settlement Area 7, to ensure that they address the needs of this area over the plan period. This would be an exceptional circumstance to amend the extent of the Settlement Area boundary to encompass land otherwise within the Green Belt.</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying</p>	

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

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

Comment ID	LPSD-1065
Person ID	1248833
Include files	LPSD-628, 1063-1065 and 1408-EM-Storey Attach 3 of 8 2507_Redacted.pdf
Consultee Name	Mr Philip Galvin
Position	
Company / Organisation	
Agent ID	1248751
Agent Name	Mr Jonathan Storey
Position	Senior Planner
Company / Organisation	Pegasus Group
Number	Policy WS 3
Title	Strategy for Housing
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	see attached WS 3.1 justification for NDSS needed & viability testing floorspace assumptions dont match, insufficient evidence for accessibility standard, and viability assessment concerns WS 3.2 The Council have not provided any evidence to justify how the housing density

<p>as precise as possible.</p>	<p>requirements respond to the needs of the Borough and how this will deliver the quantum of larger family housing required.</p> <p>If found to be unsound, further consideration would need to be given to new residential allocations that are viable and can deliver lower density schemes and provide for larger family housing and affordable housing.</p> <p>WS 3.3 The Council have not provided any evidence to justify how they will deliver the quantum of affordable housing required. There is reference to the need for a 'robust' affordable housing policy which has not been forthcoming. This will further lead to a greater undersupply of affordable homes and inequalities across the Borough.</p> <p>If found to be unsound, further consideration would need to be given to new residential allocations that are viable and can deliver affordable housing to respond to the needs of the Borough</p> <p>WS 3.4 not clear how all new residential development will be able to meet the mix</p> <p>WS 3.5 do not consider evidence is appropriate</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	

<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>If found to be unsound, further consideration would need to be given to new residential allocations that are viable and can deliver lower density schemes and provide for larger family housing and affordable housing.</p> <p>flexibility in WS 3.4</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to</p>	

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

Comment ID	LPSD-1066
Person ID	1250722
Include files	LPSD-1066 and 1411-EM-Jones 2407_Redacted.pdf
Consultee Name	Ms. Marilyn Jones
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 8.2
Title	Sustainable Construction – Energy Efficiency, Overheating and Cooling, and Water Usage
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 8.2
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	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.	<p>Government are putting pressure on councils to build new housing - and on Wirral they are insisting our Council builds 800 homes every year up to 2032. Liz Truss and other Tory ministers have written on their belief that building on Green Belts should be supported by their party members. On the map, remaining Green Belt is earmarked for development around: - Greasby / Saughall Massie / Pensby / Heswall / Irby / Thingwall / Storeton / Clatterbridge / Eastham / Upton / West Kirby / Thurstaston.</p> <p>My response to the Local Plan is primarily & principally to do with Climate Change. It is unfortunate that we have a Tory government which simply is not interested in the environment nor the existential threat of Climate Change upon it.</p> <p>New homes need to be built :-</p> <p>* Based on more credible census population numbers, reflecting a shrinking population.</p>

	<p>* On legitimate brownfield sites, where low-cost housing is actually needed & where existing local infrastructure / shops / schools can be regenerated where it is needed.</p> <p>* The housing & infrastructure itself needs to be sustainable & future-proofed, with built-in insulation / solar power.</p> <p>Housing is STILL being built with gas boilers & no provision for present & future needs re. Climate Change.</p> <p>Many people feel an increasing level of stress, insecurity & anxiety for our world & its climate, especially for our future generations - its a pity that so many of our politicians & councillors don't feel the same.</p> <p>We need action - & our Local Plan needs to put Climate Change right at the top of the agenda.</p> <p>If the recent horrendous temperatures felt in the UK and wild-fires around the entire world don't wake people up to act, then nothing will.</p>
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations	

<p>Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<ul style="list-style-type: none"> • The housing & infrastructure itself needs to be sustainable & future-proofed, with built-in insulation / solar power. <p>Housing is STILL being built with gas boilers & no provision for present & future needs re. Climate Change.</p> <p>As to retro-fitting of insulation in our current housing stock, insulation which is so badly needed - there is on Wirral only enough funding for 500 homes for grants through the Sustainable Warmth Fund.</p> <p>Local Plan needs to put Climate Change right at the top of the agenda.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in</p>	

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

LPSP-1067

Comment ID	LPSP-1067
Person ID	1323868
Include files	LPSP-1067-1068-1069-EM-Thomas Attach 1 of 2 2407_Redacted.pdf LPSP-1067-EM-Thomas Attach 2 of 2 2407_Redacted.pdf
Consultee Name	Churchill Retirement Living
Position	
Company / Organisation	
Agent ID	1323866
Agent Name	Mr Ziyad Thomas
Position	Associate Director
Company / Organisation	Planning Issues Ltd
Number	Policy WS 3.3
Title	Affordable Housing Requirements
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.3
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective
Please give details of why you consider the Local Plan is unsound. Please be	Our concerns are that the Viability Assessment may have overplayed the viability of older persons' housing. See attachment for results of viability modelling. It concluded that elderly persons' housing can deliver policy compliant levels for affordable housing and CIL contributions well in excess of those proposed 'standard' affordable housing. The respondents' do however have significant reservations over both the methodology and assumptions used in the Local Plan Viability Assessment which is substantially overstates the viability of these forms of accommodation.

<p>as precise as possible.</p>	<p>We consider the Wirral Local Plan 202 to 2037 CIL & Viability assessment has significantly downplayed several viability assumptions in order to generate the level of surplus shown in the Viability assessment. Most pertinently they have not applied the BCIS building costs for supported housing.</p> <p>The Local Plan is therefore considered to be unsound on the grounds the affordable housing targets are not justified, positively prepared or effective.</p> <p>Council members, officers and the general public will assume that applications for sheltered or extra care housing will be able to support a policy compliant level of affordable housing. This would however be at odds with the viability evidence underpinning the Local Plan. Furthermore, no reference is made to the inability of older persons' housing typologies providing policy compliant levels of affordable housing in either the test of Policy WS3.3 or its justification.</p> <p>It would be more appropriate to set a nil affordable housing target for sheltered and extra care development, at the very least in urban areas.</p> <p>Please see attachment to see Para 5.33 of Policy HP5 in the emerging Fareham Borough Local Plan. A nil affordable housing rate could facilitate a step change in the delivery of older person's housing in the Wirral helping to meet the diverse housing needs of the elderly as detailed in Policy WS 3.6.</p> <p>McCarthy Stone and Churchill Retirement Living consider the Wirral Local Plan 2021 to 2037 CIL and Viability Assessment does not in our view provide a credible basis for determining affordable housing rates for specialist older persons' housing across the authority. Aspects of the methodology and level of detail provided are a significant cause for concern, we would respectfully as that these are revisited prior to submission of the Plan to Examination in Public.</p> <p>If the Council does not revise its position on affordable housing contributions from specialist older persons' housing the respondent would like to participate in Examination in Public.</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	<p>Burdening specialist forms of accommodation with an unrealistic affordable housing requirement on the presumption that viability will be considered on a site-specific basis, but not making this clear to either developers or Council Officers in the wording of the policy creates both uncertainty and a significant opportunity for conflict. This is particularly concerning as the NPPF and the PPG both make it clear that the weight attributed to the viability assessment is at the discretion of the decision maker.</p>
<p>If you wish to make a separate representation, relating to legal</p>	

<p>compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Viability value areas in Appendix 5 do not follow settlement area boundaries and requires a clearer map to help developers understand the required level of affordable housing contributions</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p>	

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

Comment ID	LPSD-1068
Person ID	1323868
Include files	LPSD-1067-1068-1069-EM-Thomas Attach 1 of 2 2407_Redacted.pdf
Consultee Name	Churchill Retirement Living
Position	
Company / Organisation	
Agent ID	1323866
Agent Name	Mr Ziyad Thomas
Position	Associate Director
Company / Organisation	Planning Issues Ltd
Number	Policy WS 3.6
Title	Specialist Housing
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.6
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	Please see attachment. In the first instance, we commend the Council for taking active steps to increase the delivery of specialist older person's housing.
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.	

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

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

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

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

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

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

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

Comment ID	LPSD-1069
Person ID	1323868
Include files	LPSD-1067-1068-1069-EM-Thomas Attach 1 of 2 2407_Redacted.pdf
Consultee Name	Churchill Retirement Living
Position	
Company / Organisation	
Agent ID	1323866
Agent Name	Mr Ziyad Thomas
Position	Associate Director
Company / Organisation	Planning Issues Ltd
Number	Policy WS 8.2
Title	Sustainable Construction – Energy Efficiency, Overheating and Cooling, and Water Usage
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 8.2
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>The wording of the policy encourages developers to maximise opportunities to reduce greenhouse gas emissions and encourages all developments to be 'zero carbon by design' and where possible built to Passivhaus standards.</p> <p>The wording of the policy is however unclear as to whether there is a mandatory requirement for all new major development to achieve net zero from the point of adoption of the Local Plan, or whether this requirement will be 'stepped' in line with Government Targets.</p> <p>It is our view that the stepped approach to net zero is more pragmatic, as it allows developers appropriate time to suitably amend their designs and specifications in an efficient way and for the cost of energy efficiency technologies to fall.</p>

	<p>Were the Council seek net zero from new development from the point of the Local Plan's adoption then we would respectfully remind the Council that the PPG states that "The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the Plan" (Para: 002 Ref ID 10-002-20190509)</p> <p>Appropriate uplift to build costs for delivering net zero embodied carbon should be allowed for in the forthcoming Local Plan Viability Assessment</p>
<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you</p>	<p>Take a stepped approach to delivering net zero carbon dwellings from the adoption of the Local Plan.</p>

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

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

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

If you wish to participate in the

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

LPSD-1070

Comment ID	LPSD-1070
Person ID	1324126
Include files	LPSD-1070-1071 and 1426-EM-Riley Attach 2507_Redacted.pdf
Consultee Name	Mr John Riley
Position	Principal Planning Officer
Company / Organisation	
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.	2.22
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	Please refer to attachment LCC welcomes the provision in the Local Plan for Wirral to meet its housing and employment needs within its boundaries(paragraph 2.22).LCC have previously provided comments to Wirral confirming that any unmet need would not be able to be met by LCC and this has been confirmed by Wirral that there was no expectation on Liverpool to take any of Wirral's housing numbers. LCC considers that Wirral meeting it's housing and employment needs will not adversely affect Liverpool and Wirral has fulfilled its duty to co-operate in relation to the Local Plan LCC supports Wirral's Local Plan in recognition of Liverpool City Centre as the Regional Centre(paragraph 3.233)within the retail hierarchy of town centres and Birkenhead being a Sub-Regional Centre.
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be	

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

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

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

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

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

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

LPSD-1071

Comment ID	LPSD-1071
Person ID	1324126
Include files	LPSD-1070-1071 and 1426-EM-Riley Attach 2507_Redacted.pdf
Consultee Name	Mr John Riley
Position	Principal Planning Officer
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy RA 6
Title	Wirral Waters Regeneration Area
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	Bidston Dock Masterplan Area (MPA-RA6.3)

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	LCC would like to see a reference stating any development proposals within the Bidston Dock Masterplan Area must not adversely impact Liverpool and the Regional Centre.
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.	

<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</p>	<p>LCC would like to see a reference stating any development proposals within the Bidston Dock Masterplan Area must not adversely impact Liverpool and the Regional Centre.</p>

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

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

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

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	
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Comment ID	LPSD-1072
Person ID	1248347
Include files	
Consultee Name	Dr Ruth Chadwick
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	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	3.15 - 3.18
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	Not Justified
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>While there is much to be commended in the Wirral Local Plan Submission Draft, I have significant concerns about the ways in which housing need has been estimated (paras 3.15 - 3.18) and the housing trajectory set (Appendix 4). In my view, the Plan is unsound in relation to these matters for the reason that they are unjustified.</p> <p>Estimation of housing need: The Wirral Local Plan states at para 3.15 that "the total need identified is 13,360 dwellings but it is necessary to identify a larger supply to make allowances for the potential that sites may not come forward at the pace expected. This Local Plan therefore makes provision for the delivery of approximately 17,750 dwellings."</p> <p>No clear evidence is presented to justify the target delivery figure of 17,750 dwellings. The government's standard methodology for estimation of housing need indicates a far lower figure. It makes questionable sense to plan for a larger housing supply in order to redress a deficit in site supply, and how this will be done is not clarified. No clear evidence is presented on the likely downward pressure of Brexit, Covid-19 and new economic pressures on estimated housing need.</p>

	<p>Setting of housing trajectory: The Wirral Plan includes at Appendix 4 a housing trajectory showing annualised targets for housing supply over the life of the Plan. No clear evidence is presented to justify what appear to be targets for housing supply well in excess of annualised requirements. It is not clear in the Plan how and when achievement of housing supply targets will be formally reviewed.</p> <p>There is concern that over-estimation of housing need and housing supply targets well in excess of annualised requirements, together with a lack of clarity in the timing and approach to formal review of housing delivery, work together to increase substantially the longstanding pressure to release Green Belt land. The immediate effect is to incentivise development proposals to build on Green Belt land rather than brownfield sites - as evidenced by the current planning applications by Leverhulme Estate to build over 800 houses across multiple sites on valued Green Belt land. The overall effect will be to undermine the strategic aims of the Plan in relation to climate change and protection of the environment and Green Belt, leading to policy inconsistency in the Plan, and flying in the face of the overwhelming public opposition in Wirral to building on Green Belt land.</p>
<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations</p>	

<p>Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Estimates of housing need and housing planning trajectories: The approaches to estimation of housing need and the setting of annualised targets for housing delivery need to be fully justified, and driven clearly by evidence not politics. More transparency is needed in the use of best available evidence and planning assumptions. The potential impacts of Brexit, the Covid-19 pandemic and new economic pressures on future housing need should be taken into account through further expert modelling to identify alternative future scenarios.</p> <p>Formal review of delivery against housing supply targets: A justified approach and timeline for formal review of housing supply against evidence-based targets should be clarified. An approach and timeline for strengthening incentives for the identification and appropriate development of brownfield sites in the event that the pace of housing delivery is below justifiable targets, should be clarified.</p> <p>Policy on protection of Green Belt land: The Plan should present a coherent policy position and clearer policy commitment in relation to the protection of Green Belt land and green spaces. A moratorium on planning applications for housing and related developments on Green Belt land pending formal review of delivery against housing targets, and a clear commitment to further incentivise brownfield site development in the event that housing delivery is slower than expected, are needed.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in</p>	

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

Comment ID	LPSD-1073
Person ID	1248347
Include files	
Consultee Name	Dr Ruth Chadwick
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	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	3.15 - 3.18
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	Not Justified
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>While there is much to be commended in the Wirral Local Plan Submission Draft, I have significant concerns about the ways in which housing need has been estimated (paras 3.15 - 3.18) and the housing trajectory set (Appendix 4). In my view, the Plan is unsound in relation to these matters for the reason that they are unjustified.</p> <p>Estimation of housing need: The Wirral Local Plan states at para 3.15 that "the total need identified is 13,360 dwellings but it is necessary to identify a larger supply to make allowances for the potential that sites may not come forward at the pace expected. This Local Plan therefore makes provision for the delivery of approximately 17,750 dwellings."</p> <p>No clear evidence is presented to justify the target delivery figure of 17,750 dwellings. The government's standard methodology for estimation of housing need indicates a far lower figure. It makes questionable sense to plan for a larger housing supply in order to redress a deficit in site supply, and how this will be done is not clarified. No clear evidence is presented on the likely downward pressure of Brexit, Covid-19 and new economic pressures on estimated housing need.</p>

	<p>Setting of housing trajectory: The Wirral Plan includes at Appendix 4 a housing trajectory showing annualised targets for housing supply over the life of the Plan. No clear evidence is presented to justify what appear to be targets for housing supply well in excess of annualised requirements. It is not clear in the Plan how and when achievement of housing supply targets will be formally reviewed.</p> <p>There is concern that over-estimation of housing need and housing supply targets well in excess of annualised requirements, together with a lack of clarity in the timing and approach to formal review of housing delivery, work together to increase substantially the longstanding pressure to release Green Belt land. The immediate effect is to incentivise development proposals to build on Green Belt land rather than brownfield sites - as evidenced by the current planning applications by Leverhulme Estate to build over 800 houses across multiple sites on valued Green Belt land.</p> <p>The overall effect will be to undermine the strategic aims of the Plan in relation to climate change and protection of the environment and Green Belt, leading to policy inconsistency in the Plan, and flying in the face of the overwhelming public opposition in Wirral to building on Green Belt land</p>
<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying</p>	

Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>Estimates of housing need and housing planning trajectories: The approaches to estimation of housing need and the setting of annualised targets for housing delivery need to be fully justified, and driven clearly by evidence not politics. More transparency is needed in the use of best available evidence and planning assumptions. The potential impacts of Brexit, the Covid-19 pandemic and new economic pressures on future housing need should be taken into account through further expert modelling to identify alternative future scenarios.</p> <p>Formal review of delivery against housing supply targets: A justified approach and timeline for formal review of housing supply against evidence-based targets should be clarified. An approach and timeline for strengthening incentives for the identification and appropriate development of brownfield sites in the event that the pace of housing delivery is below justifiable targets, should be clarified.</p> <p>Policy on protection of Green Belt land: The Plan should present a coherent policy position and clearer policy commitment in relation to the protection of Green Belt land and green spaces. A moratorium on planning applications for housing and related developments on Green Belt land pending formal review of delivery against housing targets, and a clear commitment to further incentivise brownfield site development in the event that housing delivery is slower than expected, are needed.</p>
If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? * No, I do not wish to participate in hearing session(s)	<p>No, I do not wish to participate in hearing session(s)</p>

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

Comment ID	LPSD-1074
Person ID	1248347
Include files	
Consultee Name	Dr Ruth Chadwick
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Appendix 4
Title	Housing Trajectory
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.	Appendix 4 - Housing Trajectory
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>While there is much to be commended in the Wirral Local Plan Submission Draft, I have significant concerns about the ways in which housing need has been estimated (paras 3.15 - 3.18) and the housing trajectory set (Appendix 4). In my view, the Plan is unsound in relation to these matters for the reason that they are unjustified.</p> <p>Setting of housing trajectory: The Wirral Plan includes at Appendix 4 a housing trajectory showing annualised targets for housing supply over the life of the Plan. No clear evidence is presented to justify what appear to be targets for housing supply well in excess of annualised requirements. It is not clear in the Plan how and when achievement of housing supply targets will be formally reviewed.</p> <p>There is concern that over-estimation of housing need and housing supply targets well in excess of annualised requirements, together with a lack of clarity in the timing and approach to formal review of housing delivery, work together to increase substantially the longstanding pressure to release Green Belt land. The immediate effect is to incentivise development proposals</p>

	<p>to build on Green Belt land rather than brownfield sites - as evidenced by the current planning applications by Leverhulme Estate to build over 800 houses across multiple sites on valued Green Belt land.</p> <p>The overall effect will be to undermine the strategic aims of the Plan in relation to climate change and protection of the environment and Green Belt, leading to policy inconsistency in the Plan, and flying in the face of the overwhelming public opposition in Wirral to building on Green Belt land</p>
<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	

<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Estimates of housing need and housing planning trajectories: The approaches to estimation of housing need and the setting of annualised targets for housing delivery need to be fully justified, and driven clearly by evidence not politics. More transparency is needed in the use of best available evidence and planning assumptions. The potential impacts of Brexit, the Covid-19 pandemic and new economic pressures on future housing need should be taken into account through further expert modelling to identify alternative future scenarios.</p> <p>Formal review of delivery against housing supply targets: A justified approach and timeline for formal review of housing supply against evidence-based targets should be clarified. An approach and timeline for strengthening incentives for the identification and appropriate development of brownfield sites in the event that the pace of housing delivery is below justifiable targets, should be clarified.</p> <p>Policy on protection of Green Belt land: The Plan should present a coherent policy position and clearer policy commitment in relation to the protection of Green Belt land and green spaces. A moratorium on planning applications for housing and related developments on Green Belt land pending formal review of delivery against housing targets, and a clear commitment to further incentivise brownfield site development in the event that housing delivery is slower than expected, are needed.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>No, I do not wish to participate in hearing session(s)</p>

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

LPSD-1075

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

Please state which Policy Number this representation relates to.	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	

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

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

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

LPSD-1076

Comment ID	LPSD-1076
Person ID	1324015
Include files	LPSD-985,991-993, 995, 1002, 1011-1014, 1026, 1030, 1031, 1075-1080,1100-1143,1150-1174, 1425-EM-Leyssens Attach 2 of 9 2507_Redacted.pdf LPSD-993,1026,1030,1031,1075,1076,1425-EM-Leyssens Attach 4 of 9 2507_Redacted.pdf LPSD-993,1026,1030,1031,1075,1076,1425-EM-Leyssens Attach 7 of 9 2507_Redacted.pdf LPSD-993,1026,1030,1031,1075,1076,1425-EM-Leyssens Attach 9 of 9 2507_Redacted.pdf LPSD-993,1026,1030,1031,1075,1076,1425-EM-Leyssens Attach 6 of 9 2507_Redacted.pdf LPSD-993,1026,1030,1031,1075,1076,1425-EM-Leyssens Attach 1 of 9 2507_Redacted.pdf LPSD-993,1026,1030,1031,1075,1076,1425-EM-Leyssens Attach 3 of 9 2507_Redacted.pdf LPSD-993,1026,1030,1031,1075,1076,1425-EM-Leyssens Attach 8 of 9 2507_Redacted.pdf LPSD-993,1026,1030,1031,1075,1076,1425-EM-Leyssens Attach 5 of 9 2507_Redacted.pdf
Consultee Name	Mr Andrew Leyssens
Position	
Company / Organisation	United Utilities
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy RA 4
Title	Central Birkenhead Regeneration Area
To which part of the Local Plan does this representation relate?	Site
<ul style="list-style-type: none"> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment 	
Please state which paragraph number(s) this representation relates to.	

Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	MUA-RA4.1
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective	

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

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

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

Comment ID	LPSD-1077
Person ID	1324015
Include files	LPSD-985,991-993, 995, 1002, 1011-1014, 1026, 1030, 1031, 1075-1080,1100-1143,1150-1174, 1425-EM-Leyssens Attach 2 of 9 2507_Redacted.pdf
Consultee Name	Mr Andrew Leyssens
Position	
Company / Organisation	United Utilities
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 10
Title	Infrastructure Delivery
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 10
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.	Investment in Future Infrastructure United Utilities requests the council's support for future investment in infrastructure in order to be able to expediently respond to the needs of the borough.

<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</p>	<p>The following policy wording is recommended for inclusion in the local plan:</p> <p><i>The council will support the principle of investment in infrastructure to respond to the needs of the borough. Infrastructure is key to the delivery of sustainable development and economic growth and meeting development needs. The council will be supportive of infrastructure investment which facilitates the delivery of wider sustainable development and the meeting of environmental objectives by water and sewerage providers.</i></p>

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

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

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

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

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

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

LPSP-1078

Comment ID	LPSP-1078
Person ID	1324015
Include files	LPSP-985,991-993, 995, 1002, 1011-1014, 1026, 1030, 1031, 1075-1080,1100-1143,1150-1174, 1425-EM-Leyssens Attach 2 of 9 2507_Redacted.pdf
Consultee Name	Mr Andrew Leyssens
Position	
Company / Organisation	United Utilities
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WP 8
Title	Policy for the Rural 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.	WP 8
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 Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>United Utilities wishes to highlight that it owns assets which are currently situated in the Green Belt / Open Countryside on the adopted proposals map. Upgrades to these assets may be required in the near future, and it is important to ensure that any required upgrades and expansions to these sites can be made in order for us to meet the infrastructure requirements of proposed future development in the borough and future environmental drivers. United Utilities requests support for any consequential investment which will be necessary as a result of the growth or environmental drivers.</p> <p>With regard to those sites situated in the Green Belt, National policy within the NPPF allows for:</p> <ul style="list-style-type: none"> • the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building; and

	<ul style="list-style-type: none"> • limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. <p>On this basis, we are of the opinion that National Policy is broadly supportive of expansion of our key sites of operational infrastructure in the Green Belt \ Open Countryside.</p>
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary	<p>It is therefore requested that local policy is worded to recognise that utility sites, located within the green belt or open countryside, are appropriate for development for operational purposes. Our preference would be for this principle to be reflected on the proposals map and in development plan policy.</p>

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

However, we ask for this to be specifically referred to in your future planning policies, and reflected on your proposals map. We recommend a policy based on the following wording for inclusion in the local plan.

Development proposals at existing utility sites in the green belt or open countryside either in the form of infilling or redevelopment, will be supported where they are needed to respond to future growth and environmental needs.

These policies would enable us to ensure we can continue to meet the growth and development aspirations of the borough, by ensuring that the fundamental infrastructure requirements of these future developments can be achieved.

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),

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

Comment ID	LPSD-1079
Person ID	1324015
Include files	LPSD-985,991-993, 995, 1002, 1011-1014, 1026, 1030, 1031, 1075-1080,1100-1143,1150-1174, 1425-EM-Leyssens Attach 2 of 9 2507_Redacted.pdf
Consultee Name	Mr Andrew Leyssens
Position	
Company / Organisation	United Utilities
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WD 5
Title	Residential Extensions
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 5
Please state which Site ID/Reference this representation relates to.	

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

<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</p>	<p>We request that this policy or the associated explanatory text makes reference to the need for applicants to fully understand site constraints prior to pursuing the design of a residential extension. It will be particularly important for the applicant to review the extract of maps for public sewers and water mains to understand if a proposal is deliverable and to review the planning history to establish of permitted development rights have been removed as a result of asset protection concerns. The text should state that applicants will not be allowed to build over public waters or pressurised sewers and may not be allowed to build over gravity sewers.</p>

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

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

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

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	
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Comment ID	LPSD-1080
Person ID	1324015
Include files	LPSD-985,991-993, 995, 1002, 1011-1014, 1026, 1030, 1031, 1075-1080,1100-1143,1150-1174, 1425-EM-Leyssens Attach 2 of 9 2507_Redacted.pdf
Consultee Name	Mr Andrew Leyssens
Position	
Company / Organisation	United Utilities
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy 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	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WD 3
Please state which Site ID/Reference this representation relates to.	

<p>Please state which Policies Map (Inset Map number(s)) this representation relates to.</p>	
<p>Legally compliant * Yes * No</p>	
<p>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</p>	
<p>Sound * Yes * No</p>	No
<p>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</p>	
<p>If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy</p>	
<p>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</p>	<p>Please refer to attachment.</p> <p>On a more general point, as part of our response to the Environment Act and in preparation for the future delivery of BNG, we are currently reaching out to local authorities to ensure we develop a BNG strategy that, wherever possible, supports local biodiversity and nature recovery needs. We are currently evaluating all land owned by United Utilities within local authorities that could be used for habitat creation or enhancement works and developing a list of candidate sites. In identifying land, we clearly recognise the strategic importance of aligning our site selection process with local, regional and national policies and objectives on biodiversity and nature recover</p>

omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of	<p>Whilst recognising the benefit of on-site delivery of BNG in many circumstances, we wish to highlight the need for flexibility to the delivery of BNG. In many instances, off-site delivery may be more appropriate. For example, off-site delivery in a strategic location that has been identified through a Local Nature Recovery Strategy where there are opportunities to pool the benefits of BNG from many small development proposals. We therefore request flexibility to the policy on biodiversity to facilitate off-site delivery in appropriate circumstances.</p> <p>We also request that the policy on BNG reflects the unique circumstances of infrastructure providers. We are keen to ensure that BNG is delivered in the most appropriate locations however, this should be carefully considered in the context of ensuring key infrastructure is not constrained by on-site provision of BNG, which could be to the detriment of responding to future growth and environmental needs. Key operational infrastructure is often very geographically restricted and cannot be easily moved. Therefore off-site provision of BNG may be in the best interests of good long term planning and environmental needs to ensure that there is space around infrastructure for future expansion. This should be reflected in Policy WD 3.</p>

<p>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>As part of the preparation of your new local plan, we would welcome the opportunity to further discuss your approach to the delivery of BNG and the identification of strategic opportunities to support local nature recovery.</p> <p>UU is supportive of any approach to the planting of new trees and woodland and would encourage the council to consider this in the context of flood risk management and opportunities to 'slow the flow' reflecting our wider comments relating to flood and surface water management.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	

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-1081
Person ID	1241096
Include files	LPSD-513 & 1081-EM-Darwent Form 2407_Redacted.pdf
Consultee Name	Mrs Sue Darwent
Position	Secretary
Company / Organisation	Rectory Road Field Community Group
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	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	LGS-SA6.2
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.	<p>Reference to Policy WS 10.6 Open Space (LGS – SA 6.2)</p> <p>I have done my best to support the designation of Rectory Road paddocks (Title No. MS665009) (OS Map Reference: SJ2186SE) as Local Green Space (LGS). I believe that the designation process has been sound and effectively taken forward by Wirral Borough Council, giving the local community the opportunity to be involved in deciding what is important for the area, consistent with national policy.</p> <p>The Local Plan emphasises the importance of greenspace (Policy WS 5.1), protecting and enhancing the quality of existing green infrastructure and specifically states that 'the loss of green infrastructure is unacceptable.'</p> <p>Designating the paddocks as LGS directly supports the overall Local Plan and the specific objectives for West Kirby (p.226, 5.51). Designation will preserve and enhance West Kirby (Old Village) Conservation Area. It also helps to address the local shortfall in amenity greenspace.</p> <p>I'm pleased that WBC agrees that this small area fulfils the criteria for designation:</p> <ul style="list-style-type: none"> • It is close to the community it serves. • It is an essential part of the local landscape, a tranquil green space and wooded area which together with the school playing fields, create a semi-rural appearance to the setting of the church, rectory and Ring o' Bells. • It lies within West Kirby Old Village Conservation Area. 'The red sandstone walls, woodland areas, adjacent unmade paths and lanes, and open aspect of remnant fields indicate the original character of the village which should be preserved, retained and enhanced.' (Insall, D. 2007, 2009). • Being glebe land, it has a unique heritage, and contains one of the oldest buildings in West Kirby, the tithe barn (c1712). • The beauty, history and tranquillity of the area attracts visitors, supporting the local tourist economy. • The glebe forms part of a network of greenspaces and undeveloped sites passing from Grange Hill to the north, down to Ashton Park to the west and across to Caldly Hill. Such an undisturbed habitat helps to preserve biodiversity on a local scale. <p>The original LGS application (2019) was supported by many local residents and groups including three ward councillors, our MP, members of St. Bridget's Parochial Church Council, and St Bridget's Church Centre, West Kirby Museum Chairperson, Elizabeth Davey and local historians, representatives of St. Bridget's Pre-school Committee and Trustees, and of St. Bridget's School Governors and Parents Association, Derek Longman Chair of Friends of Grange Hill, the Friends of Ashton Park, Friends of Coronation Gardens, Friends of Sandlea Park, Transition Town West Kirby, and Conservation Wirral.</p> <p>Please refer to attachment for names of members of the Rectory Road Field Community Group, consisting of 20 households who also support LGS designation:</p> <p>A Facebook group aiming to publicise and protect this green space for the future attracted over 950 members within three weeks of being set up. It currently has over 1,200 members. A petition to protect the paddocks from development was signed by over 3,000 people.</p>
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.	
<p>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</p> <ul style="list-style-type: none"> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy 	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	
<p>omplies with the Duty to co-operate</p> <ul style="list-style-type: none"> * 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 that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
If your representation is seeking a	

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

LPSP-1082

Comment ID	LPSP-1082
Person ID	1324064
Include files	LPSP-659, 1082-89-EM-Holding Attach 3 of 9 2507_Redacted.pdf
Consultee Name	Mr Paul Murray
Position	
Company / Organisation	Redrow Homes
Agent ID	1323678
Agent Name	Dominic Holding
Position	Senior Planner
Company / Organisation	Lichfields
Number	Policy WS 3.1
Title	Housing Design Standards
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.1
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment The requirement for all dwellings to accord with the nationally described space standard (or any successor standard) has not been justified. Furthermore, Redrow considers that the implementation of the nationally described space standards will not be achievable with the minimum densities prescribed by Policy WS 3.2, and will have implications for viability and the delivery of affordable housing. No assessment of the interrelationship between these considerations and how they affect one another has been provided by the Council within its

<p>as precise as possible.</p>	<p>evidence base.</p> <p>4.4 Similarly, the Council's evidence base does not robustly justify the need for introducing the water efficiency standards at the levels proposed, or the requirement to be the carbon ready by design. Although Redrow is not against sustainability objectives in principle, it considers that these requirements will have an impact on viability and affordable housing delivery.</p> <p>4.5 In addition, the Future Homes Standard will require new build homes to be future proofed with low carbon heating and a high-level of energy efficiency by 2025. There has been no allowance for this in the Local Plan CIL & Viability Assessment 2022 [2022 LPCVA]. The Consortium's Viability Technical Paper sets out that that based on specialist QS advice, the costs associated with Future Homes Standards are estimated to be £8,000 per dwelling.</p> <p>The omission of this cost in the 2022 LPCVA results in an exaggeration of site viability, which will result in a significantly worsened viability position across all sites when factored into the appraisals. Redrow considers that this oversight will have a significant impact on the deliverability and developability of sites. The 2022 LPCVA already concludes that certain sites are unviable on a policy compliant basis. This additional cost will generate an even greater viability deficit.</p> <p>4.6 It is Redrow's view that once the Council correctly assesses viability, it will inevitably need to release appropriate and sustainable Green Belt sites in order to deliver a sufficient number of high-quality family and affordable homes. Storeton Garden Village is well situated in this regard.</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance,</p>	

<p>soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>4.8 Redrow suggests that the requirement to adhere to nationally described space standards is removed, or the policy is fully justified and the wording updated to allow appropriate flexibility. The Council must then consider what bearing this has on proposed densities, viability, and affordable housing delivery.</p> <p>4.9 The 2022 LPCVA should also be updated to take account of the costs of Future Homes Standard so that the viability of sites is not overstated.</p> <p>4.10 The Council must then identify residential sites that can viably meet the requirements of Policy WS 3.1. It is Redrow's suggestion that Storeton Garden Village is released from the Green Belt and allocated for residential development, as a scheme which can viably deliver an appropriate mix of homes, community facilities and affordable housing.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? * No, I do not wish to</p>	<p>Yes, I wish to participate in hearing session(s)</p>

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

LPSP-1083

Comment ID	LPSP-1083
Person ID	1324064
Include files	LPSP-659, 1082-89-EM-Holding Attach 3 of 9 2507_Redacted.pdf
Consultee Name	Mr Paul Murray
Position	
Company / Organisation	Redrow Homes
Agent ID	1323678
Agent Name	Dominic Holding
Position	Senior Planner
Company / Organisation	Lichfields
Number	Policy WS 3.3
Title	Affordable Housing Requirements
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.3
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment 5.15 Redrow considers that Policy WS 3.3 will fail to meet the tests of soundness for the following reasons: 1 It is not positively prepared: The Council's methodology in calculating affordable housing need is flawed, and derives a suppressed figure. Based on the claimed supply identified in the Local Plan, the Council will fail to meet the Borough's affordable housing needs. As such, it is not consistent with achieving sustainable development.

<p>as precise as possible.</p>	<p>2 It is not justified: arc4's methodology to calculate affordable housing need is flawed and has generated a suppressed the affordable housing need figure. Additionally, given the high quantum of the Council's supply in Viability Zones 1 & 2, the policy is not an appropriate strategy to deliver the identified affordable housing need.</p> <p>3 It is not effective: By only requiring 10% affordable dwellings from market developments in Viability Zones 1 & 2, despite the evidence indicating they are unviable, (and allowing these affordable dwellings to be deferred), the policy does not deliver a mechanism for meeting the Borough's affordable housing needs. In addition, a prescriptive approach to affordable housing requirements impacts upon viability, and jeopardises the potential to meet the actual need at the time of delivery.</p> <p>4 It is not consistent with national policy: The policy does not reflect the need for affordable homes identified in the Council's evidence (2021 SHMA), as required by the Framework [§62].</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	

<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>5.16 The Council needs to identify and release sustainable and suitable sites in Wirral which can viably deliver at least 20% affordable housing.</p> <p>5.17 Redrow considers that the quantum of affordable housing need required in Wirral cannot be addressed by the Council's urban intensification approach. The level of affordable housing need alone in Wirral represents exceptional circumstances to justify changes to the Green Belt boundaries to allocate sites capable of viably delivering affordable housing</p> <p>5.19 As the fundamental issues with Policy WS 3.3 relate to the Council's urban intensification strategy, it will not be possible to address these soundness issues through the main modifications process</p> <p>5.20 In addition, Redrow considers sufficient flexibility should be provided to allow the split of affordable housing tenure should be agreed on a case-by-case basis, and to be based on the actual need at that time (having regard to input from Registered Providers).</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>

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

Comment ID	LPSD-1084
Person ID	1324064
Include files	LPSD-659, 1082-89-EM-Holding Attach 3 of 9 2507_Redacted.pdf
Consultee Name	Mr Paul Murray
Position	
Company / Organisation	Redrow Homes
Agent ID	1323678
Agent Name	Dominic Holding
Position	Senior Planner
Company / Organisation	Lichfields
Number	Policy WS 3.4
Title	Housing Mix
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.4
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment 3.14 The work undertaken by the Consortium (see LPSD 408) (set out within Consortium's Technical Papers 2 – Assessing the Housing Mix and 4 – Assessing the Affordable Housing Need) has demonstrated that there is a considerable need for all types of housing in Wirral, particularly larger family housing and affordable housing. The Consortium's analysis of the housing mix (set out in Section 5 of Technical Paper 2 - Assessing the Housing Mix) that would be delivered from the residential supply set out in the Local Plan shows that, based on the

as precise as possible.	requirements of emerging Policy WS 3.4, only 38% would be delivered as 3 or more bedroom properties. This highlights the mismatch between the Council's SHMA evidence (prepared by arc4) which recommended that 65% of housing is be delivered as 3 or more bedroom properties. This recommendation has been disregarded by the Council.
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	Identify housing needs. Release Green Belt land for development in the Plan to meet assessed need.

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

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

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

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

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

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

LPSP-1085

Comment ID	LPSP-1085
Person ID	1324064
Include files	LPSP-659, 1082-89-EM-Holding Attach 3 of 9 2507_Redacted.pdf
Consultee Name	Mr Paul Murray
Position	
Company / Organisation	Redrow Homes
Agent ID	1323678
Agent Name	Dominic Holding
Position	Senior Planner
Company / Organisation	Lichfields
Number	Policy WS 3.5
Title	Self-Build and Custom Build Housing
To which part of the Local Plan does this representation relate?	Policy
<ul style="list-style-type: none"> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment 	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.5
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment 6.3 The Council has not provided evidence to demonstrate that there is a sufficient demand for self-build units, and it is not clear how the Council intends that a "need is identified" for such a requirement. This creates ambiguity as to how this policy should be applied.

as precise as possible.	<p>6.4 Furthermore, it does not appear that the implications of requiring plots to be set aside and marketed for self-build purposes has been factored into the Council's viability assessment, or into the Council's proposed housing densities.</p> <p>6.5 In particular, Redrow does not consider that self-build and custom-build should be required on large-scale strategic sites, which are generally brought forward in accordance with a comprehensive masterplan.</p>
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you	6.7 In order to address the conflicts above, it is requested that the Council:

<p>consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>1 Considers if the requirement for provision of self and custom build housing is necessary and justified and whether the requirement is based on robust and sound evidence. The delivery of self-build plots on sites within the brownfield register is a more appropriate strategy rather than on strategic sites which require extensive masterplanning and comprehensive delivery strategies.</p> <p>2 Provide further evidence which considers the financial/viability implications of this policy requirement, as well as impact on densities.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>If you wish to participate in the</p>	

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

Comment ID	LPSD-1086
Person ID	1324064
Include files	LPSD-659, 1082-89-EM-Holding Attach 3 of 9 2507_Redacted.pdf
Consultee Name	Mr Paul Murray
Position	
Company / Organisation	Redrow Homes
Agent ID	1323678
Agent Name	Dominic Holding
Position	Senior Planner
Company / Organisation	Lichfields
Number	Policy WP 8
Title	Policy for the Rural Area
To which part of the Local Plan does this representation relate?	Policies Map
* Paragraph(s)	
* Policy	
* Site	
* Policies Map	
* Sustainability Appraisal	
* Habitat Regulations Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	Bebington SE Map 4 of 4
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.	
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.	Please refer to attachment For the avoidance of doubt, it should be noted that Redrow objects to the Proposal Map which includes the site within the Green Belt, and considers that the site should be released from the Green Belt and allocated for residential-led development. Redrow objects to the overall spatial strategy and spatial distribution as illustrated in the Proposals Map.
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	Release Green Belt land for development in the Local Plan, including Storeton Garden Village.

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

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

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

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

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

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

Comment ID	LPSD-1087
Person ID	1324064
Include files	LPSD-659, 1082-89-EM-Holding Attach 3 of 9 2507_Redacted.pdf
Consultee Name	Mr Paul Murray
Position	
Company / Organisation	Redrow Homes
Agent ID	1323678
Agent Name	Dominic Holding
Position	Senior Planner
Company / Organisation	Lichfields
Number	Policy WS 3.6
Title	Specialist Housing
To which part of the Local Plan does this representation relate?	Policy
* Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.6
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment Furthermore, despite the 2021 SHMA identifying a significant unmet need for older persons accommodation in the Borough, no provision is made to meet this need. This need should be over and above LHN. The Consortium would be concerned if the Council were to seek to 'net off' any Older Persons and Specialist Housing Needs from the 835 dpa housing target.

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	Increase the housing requirement to deliver housing for older people.

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

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

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

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

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

LPSP-1088

Comment ID	LPSP-1088
Person ID	1324064
Include files	LPSP-659, 1082-89-EM-Holding Attach 3 of 9 2507_Redacted.pdf
Consultee Name	Mr Paul Murray
Position	
Company / Organisation	Redrow Homes
Agent ID	1323678
Agent Name	Dominic Holding
Position	Senior Planner
Company / Organisation	Lichfields
Number	Policy WS 7.1
Title	Design Principles
To which part of the Local Plan does this representation relate?	Policy
* Paragraph(s)	
* Policy	
* Site	
* Policies Map	
* Sustainability Appraisal	
* Habitat Regulations Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 7.1
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be	please refer to attachment 7.2 Redrow does not have any substantive concerns with the general objectives of WS 7.1 and welcomes the inbuilt flexibility in the application of Policy WS 7.1 through the inclusion of "where appropriate" in the Policy wording.

<p>as precise as possible.</p>	<p>7.4 There are however specific aspects of Policy WS 7.1 which are vague, and do not provide applicants with sufficient clarity as to how these policy tests can be met. For example, in respect of Part 1, besides from typical accessibility considerations, it is not clear from the policy wording how development would meet this criteria, and demonstrate (for example) that enables use by all ages and genders.</p> <p>7.5 In respect of Part 2, “visually attractive” is a highly subjective term which is likely to result in a disagreement between applicants and the Council. Part 4 requires the use of “high quality materials” albeit it is not clear what this means or how this would be applied. Part 11 does not specify (for example) appropriate levels of electric car charging infrastructure. In respect of Part 14, it is not clear what level of internal or external space is appropriate for “lifetime needs”.</p> <p>7.6 In general, Redrow is concerned that WS 7.1 is too vague, and would provide uncertainty for both applicants and decision-makers.</p>
<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations</p>	

<p>Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>7.1 In order to address the conflict above and ensure the Policy is sound, it is requested that the Council:</p> <p>1 Reconsiders the detailed wording of the Policy and provides a clear strategy as to how developers are to demonstrate compliance.</p> <p>2 Factors in any requirements (for example Part 11) into its viability evidence.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in</p>	<p>Yes, I wish to participate in hearing session(s)</p>

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

Comment ID	LPSD-1089
Person ID	1324064
Include files	LPSD-659, 1082-89-EM-Holding Attach 3 of 9 2507_Redacted.pdf
Consultee Name	Mr Paul Murray
Position	
Company / Organisation	Redrow Homes
Agent ID	1323678
Agent Name	Dominic Holding
Position	Senior Planner
Company / Organisation	Lichfields
Number	Policy WS 8.1
Title	Energy Hierarchy
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 8.1
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment 8.2 Redrow does not have fundamental concerns with the principle of Policy 8.1 and recognises the importance of minimising energy demand. 8.3 Redrow's key concern is that the financial cost of implementing the requirements set out within the policy have not been factored into the Council's viability evidence. Therefore, this miscalculation is likely to further impact on the delivery of affordable housing.

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	8.5 In order to ensure that Policy WS 8.1 is sound it is recommended that the Council considers the costs of implementing the policy within its viability evidence.

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

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

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

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

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

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

LPSP-1090

Comment ID	LPSP-1090
Person ID	1241337
Include files	LPSP-1090-1094-EM-Jenner 2507_Redacted.pdf
Consultee Name	Mrs Katherine Jenner
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	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	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	fully support the submission of the Heswall Society earlier this month in relation to new housing requirements and green space. It is unbelievable that building of new homes is required to be based on a (high) out of date housing need figure. Why has the Council not produced its own 'Objectively Assessed Need' given that the 2014 figures have been widely discredited? The pressures to build more than needed is both wasteful of precious resources and a waste of money, and poor use of land that could otherwise be part of our much needed farmland, green space and woodland – particularly in some of the brown field sites in our built up areas. Our built up areas need more community green space and tree planting, for environmental, climate change and well-being reasons. Our farmland is needed for food production. Please can the housing need figure be updated.

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

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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LPSP-1091

Comment ID	LPSP-1091
Person ID	1241337
Include files	LPSP-1090-1094-EM-Jenner 2507_Redacted.pdf
Consultee Name	Mrs Katherine Jenner
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 8.7
Title	Stand-alone Renewable and Low Carbon Energy Schemes
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 8.7
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.	Please refer to attachment Community green energy schemes. Please can we have some onshore wind turbines that link in to local homes, so people have a vested interest in having their own, cheaper, energy sources in their own communities. I am sure this would breakdown some of the barriers to onshore wind turbines. I would also like to see Wirral leading the way in getting homes insulated – a retrofitting policy should be top priority if we are to conserve our energy use and keep our homes warm – and cool – as recent events have emphasised.

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

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

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

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

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-1092
Person ID	1241337
Include files	LPSD-1090-1094-EM-Jenner 2507_Redacted.pdf
Consultee Name	Mrs Katherine Jenner
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 9.1
Title	Transport Schemes
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 9.1
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>please refer to attachment</p> <p>as well as opening up cycling and walking options on Wirral (I both cycle and walk), it is vital that a better public transport system is provided that would get more people out of cars. It is really difficult to cross Wirral east to west (rather than going in to Birkenhead or Liverpool) on public transport without changing buses and waiting for (late) connections.</p>

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

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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LPSP-1093

Comment ID	LPSP-1093
Person ID	1241337
Include files	LPSP-1090-1094-EM-Jenner 2507_Redacted.pdf
Consultee Name	Mrs Katherine Jenner
Position	
Company / Organisation	
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	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 10.6
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	the area between Thurstaston Road and Telegraph Road in Heswall designated as green space. It has had trees planted there in recent years and could be a great space for further tree planting and wildflower planting and encouragement of pollinators and other wildlife.

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

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-1094
Person ID	1241337
Include files	LPSD-1090-1094-EM-Jenner 2507_Redacted.pdf
Consultee Name	Mrs Katherine Jenner
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 8.8
Title	Climate Change and Energy Statement
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 8.8
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	despite a good climate emergency policy, action is not speedy and climate issues are still too far down the priority considerations when decisions are being reached

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

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-1095
Person ID	1324021
Include files	LPSD-1045 and 1095-EM-Evans Attach 2507_Redacted.pdf
Consultee Name	Ms Kate McClean
Position	
Company / Organisation	Bloor Homes North West
Agent ID	1248824
Agent Name	Mr Lewis Evans
Position	Associate Director
Company / Organisation	Turley
Number	Policy WS 1
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	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment he proposed spatial distribution is flawed and contrary to the LP Vision and Strategic Objectives which seek to inter alia enable the provision of sufficient housing to meet identified local housing needs and choice.

as precise as possible.	<p>The proposed DWLP approach will fail to capitalise on the opportunities Resented beyond the RAs such as the existing housing areas of West Wirral, Which offer the potential to support Wirral's economic growth and ambition.</p> <p>Furthermore, the lack of diversity in the supply - with an emphasis on high density urban schemes - poses a significant risk that Wirral's housing needs will not be met both in terms of the overall amount but also the type of housing, with the Council's evidence demonstrating a need for c. two-thirds 3+ bedroomed Dwellings.</p> <p>West Wirral represents c.50% of the population in some of the least deprived areas in Wirral. Delivering new housing in these locations has the potential to significantly contribute towards the Vision and SOs, in a way that the RAs cannot. Principally, these areas offer the potential to support the economic competitiveness of Wirral in the short term and over the remainder of the plan period. Sites such as Bloor's site to the west of Greasby can accommodate high-quality family housing in an attractive landscaped setting, in a Sustainable location. The ability to deliver Bloor's site is not dependent on public sector funding or significant infrastructure requirements. It is a low-risk site capable of making an important contribution to Wirral's success and Delivery of the DWLP.</p> <p>Wirral's Green Belt forms part of the wider Merseyside Green Belt, with just under half (45%) of the land area of Wirral designated as Green Belt. As part of the DWLP preparation, a Green Belt Review2 (GBR) was undertaken in 2019 to provide an objective, evidence-based and independent assessment of how the Green Belt contributes to the give purposes of Green Belt set out in national policy3 . The site lies within Parcel 5.11 which the GBR considers4 to make an overall weak contribution to the Green Belt. Bloor generally agrees with its conclusions, although would question whether the contribution to Purpose 3 (which the GBR assesses as moderate) has been overstated. The entire assessment parcel has defensible boundaries on all sides, contrary to the view of the Green Belt Review: the northern and western boundaries are defined by existing highway infrastructure and whilst the landscape is generally flat in this location, the settlement provides an urbanising backdrop and contains views. The site (and wider parcel) is therefore well contained and would be capable of ensuring that further encroachment beyond the parcel boundary does not happen in the future. Having identified that the Site makes a weak contribution to the Green Belt, this should be given appropriate weight as part of a site selection process. The site selection should consider sites within the Green Belt – it presently does not – and should take into account the opportunity to accommodate development in a form that would align with national policy requirements for meeting identified requirements for sustainable development and the revised spatial strategy as advocated above.</p>
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	

<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>better balanced distribution including site at Saughall Massie Road, Greasby</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to</p>	<p>Yes, I wish to participate in hearing session(s)</p>

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

Comment ID	LPSD-1097
Person ID	1248448
Include files	LPSD-573-579, 778-9, 1097-9-EM-Harris Attach 2507_Redacted.pdf
Consultee Name	Wain Homes North West Ltd
Position	
Company / Organisation	Wain Homes North West
Agent ID	1248449
Agent Name	Mr Stephen Harris
Position	
Company / Organisation	Emery Planning
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	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WP 5.1
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>Moreton Family Centre - No clear evidence has been provided to demonstrate that the site will deliver in the five year period. In any event, 1.8 C2 ratio should be applied, i.e., 75-bed care home equates to 42 dwellings.</p> <p>East of Typhoo, Reeds Lane - No clear evidence has been provided to demonstrate that the site will deliver in the five year period.</p> <p>Former Foxfield School, Douglas Drive - No clear evidence has been provided to demonstrate that the site will deliver in the five year period.</p> <p>Former Stirrup PH, Arrowe Park Road - Not assessed in the SHLAA.</p> <p>Land at Knutsford Road - No clear evidence has been provided to demonstrate that the site will deliver in the five year period.</p>

	<p>Former Dodd's Builders Merchants, Bermuda Road - Not assessed in the SHLAA.</p> <p>3.12 As shown in the table above, for the majority of the sites included in years 1 – 5 of the Council's trajectory, there is no clear evidence to demonstrate their deliverability as required by the Framework. In the absence of such evidence, these sites such be excluded from the five year supply.</p>
<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary</p>	<p>Exclude the majority of the sites from the five year supply.</p>

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

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

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

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

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

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

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

Comment ID	LPSD-1098
Person ID	1248448
Include files	LPSD-573-579, 778-9, 1097-9-EM-Harris Attach 2507_Redacted.pdf
Consultee Name	Wain Homes North West Ltd
Position	
Company / Organisation	Wain Homes North West
Agent ID	1248449
Agent Name	Mr Stephen Harris
Position	
Company / Organisation	Emery Planning
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	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	RES SA7.2
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Land at Grange Hill Far, Grange Old Road. No clear evidence has been provided to demonstrate that the site will deliver in the five year period.

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

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	
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Comment ID	LPSD-1099
Person ID	1248448
Include files	LPSD-573-579, 778-9, 1097-9-EM-Harris Attach 2507_Redacted.pdf
Consultee Name	Wain Homes North West Ltd
Position	
Company / Organisation	Wain Homes North West
Agent ID	1248449
Agent Name	Mr Stephen Harris
Position	
Company / Organisation	Emery Planning
Number	Policy WP 7.2
Title	Residential Sites
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	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 SA7.2

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Former Heswall Gospel Hall, Pensby Road - Not assessed in the SHLAA. 3.12 As shown in the table above, for the majority of the sites included in years 1 – 5 of the Council's trajectory, there is no clear evidence to demonstrate their deliverability as required by the Framework. In the absence of such evidence, these sites such be excluded from the five year supply.

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

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

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**

LPSD-1100

Comment ID	LPSD-1100
Person ID	1324015
Include files	LPSD-985,991-993, 995, 1002, 1011-1014, 1026, 1030, 1031, 1075-1080,1100-1143,1150-1174, 1425-EM-Leyssens Attach 2 of 9 2507_Redacted.pdf
Consultee Name	Mr Andrew Leyssens
Position	
Company / Organisation	United Utilities
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WD 4
Title	Coastal Protection, Flood Risk, Sustainable Drainage & Natural Water Management
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 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 Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	On-Site Sewer Flood Risk With respect to the proposed allocations, we have enclosed a series of tables which identify sites where we have a record of on-site modelled sewer flood risk. Please note that this list may not be wholly accurate as the site boundaries on the GIS data which you have sent to us is inconsistent with the boundaries of the allocations in your local plan. Noting that there are thousands of manholes that cover the allocated sites, this review needs to be undertaken using accurate GIS data which is not currently available to us. In the interim, we have provided you with an initial list of sites where flood risk affects the site based on the data that the Council has provided to us. We wish to work with the council on this matter further and once more accurate GIS information has been provided.

	<p>With respect to the interim data, we have provided a list of sites where modelled sewer flood risk affects the sites to differing degrees. Not all the sites will be significantly affected by this flood risk, however, some sites may be materially affected and therefore we wish to liaise with you to provide more information on this flood risk so that this can be reflected in your site selection process, an updated strategic flood risk assessment, any masterplanning of these sites and the detail of any site specific policy to guide development at these sites. This information will be important so that you can give consideration to the application of the 'sequential approach' in accordance with national planning policy and guidance. It is clearly our preference that sites that are at risk of flooding are not allocated if there are alternative and sequentially preferable sites that are available which are not affected by flood risk.</p> <p>The proposed site allocations could also be affected by overland flow from nearby off-site public sewers which means we need to interrogate the proposed site allocations in more detail. This may not be possible give the limited information available on the sites at the current time, for example, topographic details. Policy should be clear that this risk needs to be considered early in the design and development process and should not be displaced.</p>
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations	

<p>Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>In instances where sites are affected by sewer flood risk and it is your decision to continue to allocate the site, we suggest the following additional policy wording for each site:</p> <p><i>Existing public sewers pass through / near to this site which modelling data identifies as being at higher risk of sewer surcharge. These represent a higher risk of public sewer flooding and will need to be carefully considered in the design and masterplanning process for any development at this site. The applicant will be required to engage with United Utilities prior to any masterplanning process to ensure development is not located in an area at risk of flooding. Applicants should consider site topography and any exceedance flow paths. Resultant layouts and levels should take account of such existing circumstances to ensure the most flood resilient solution is achieved. Applicants must demonstrate that the proposed development would be safe and not lead to increased flood risk elsewhere e.g. through careful masterplanning of a site. Applicants should not assume that changes in levels or any proposed diversion of the public sewerage system will be acceptable as such proposals could increase / displace flood risk. It may be necessary to apply the sequential approach subject to the detail of the development proposal.</i></p> <p>On-Site Modelled Sewer Flood Risk – DRAFT DUE TO INACCURATE GIS INFORMATION</p> <p>Mixed Use</p> <ul style="list-style-type: none"> • MUA-RA3.1 - Morpeth Dock Mixed Use Area • MUA-RA4.1 – Hamilton Square Mixed Use Area • MUA-RA7.2 - Duke Street Mixed Use Area • MUA-RA4.2 - Claughton Road Mixed Use Area • MUA-RA7.1 - Hamilton Park Mixed Use Area • MUA-RA3.2 - Priory Village Mixed Use Area • MUA-RA7.3 - Park Street Mixed Use Area • MUA-RA2.1 - Kelvin Road Mixed Use Area <p>Employment</p> <ul style="list-style-type: none"> • EMP-SA4.3 - Former Spectrum, Caldbeck Road, Bromborough • EMP-SA4.4 - Tulip Expansion, Plantation Road, Bromborough • EMP-SA4.2 - Former Tank Farm, Commercial Road, Bromborough • EMP-SA4.1 - Former Builders Yard, Riverbank Road, Bromborough • EMP-SA5.1 - Peninsula Business Park, Reeds Lane, Moreton • EMP-SA5.4 - Tarran Way North, Moreton • EMP-SA5.3 - West of Reeds Lane - South of Access Road • EMP-SA5.2 - West of Reeds Lane - North of Access Road • EMP-RA6.4 - MEA Park Phase 2, Beaufort Road, Birkenhead • EMP-RA6.3 - MEA Park East, Beaufort Road, Birkenhead • EMP-RA6.1 - North of Beaufort Road, Birkenhead • EMP-RA6.2 - MEA Park West, Wallasey Bridge Road, Birkenhead • EMP-RA7.1 - Kern's Warehouse, Cleveland Street, Birkenhead • EMP-RA8.1 - Northside West, Dock Road, Poulton • EMP-SA2.1 - Cammell Laird South, Tranmere • EMP-SA2.2 - Tower Wharf, Birkenhead <p>Housing</p> <ul style="list-style-type: none"> • RES-SA4.11 - Unilever Research, Quarry Road East, Port Sunlight • RES-RA11.4 - 78, 78A and 82 Bebington Road, New Ferry • RES-RA11.2 - Woodhead Street Car Park, New Ferry • RES-RA11.5 - 100 New Chester Road, New Ferry • RES-SA3.3 - Sevenoaks Ph 2, Chatham Road, Rock Ferry • RES-SA4.6 - Former Croda, Prices Way, Bromborough Pool • RES-SA4.2 - Former MOD, Old Hall Road, Bromborough • RES-SA4.7 - Former D1 Oils, Dock Road South, Bromborough • RES-SA6.4 - Land at Grange Hill Farm, West Kirby • RES-SA6.7 - 2 Sherwood Grove, Meols • RES-SA5.8 - Former Dodds Builders Merchants, Moreton

- RES-SA5.4 - Former Foxfield School, Douglas Drive, Moreton
- RES-SA1.3 - Rear of Gibson House, Maddock Road, Egremont
- RES-SA5.2 - Former Moreton Municipal Building, Knutsford Road
- RES-RA10.2 - Egerton Street Playground, New Brighton
- RES-RA4.1 - WGC Town Centre Plot E, Birkenhead
- RES-RA5.1 - Hind Street, Tranmere
- RES-RA4.2 - WGC Town Centre Plot G, Birkenhead
- RES-RA4.3 - WGC Town Centre Plots I and J, Birkenhead

Regeneration Areas

- RA11 - New Ferry Regeneration Area
- RA2 - Scotts Quay Regeneration Area
- 0 - Birkenhead Regeneration Framework Area
- RA6 - Wirral Waters Regeneration Area
- RA8 - Northside Regeneration Area
- RA10 - New Brighton Regeneration Area
- RA9 - Liscard Regeneration Area
- RA1 - Seacombe Riverside Regeneration Area
- RA3 - Birkenhead Waterfront Regeneration Area
- RA4 - Central Birkenhead Regeneration Area
- RA7 - Hamilton Park Regeneration Area
- RA5 - Hind Street & St Werburghs Regeneration Area

Masterplan Areas

- MPA-RA11.1 - New Ferry
- MPA-SA4.2 - Former MOD, and Riverside Park
- MPA-SA4.1 - Former D1 Oils
- MPA-SA6.1 - West Kirby Concourse
- MPA-RA9.1 - Liscard Town Centre
- MPA-RA1.1 - Wallasey Town Hall Quarter, Toronto/Demesne Street and Borough Road East
- MPA-RA10.1 - Marine Promenade New Brighton
- MPA-RA6.2 - MEA Park
- MPA-RA4.2 - Charing Cross Quarter
- MPA-RA5.1 - Hind Street Urban Garden Village
- MPA-RA4.1 - Birkenhead Commercial Mixed Use Quarter
- MPA-RA7.1 - Britannia Residential Neighbourhood
- MPA-RA6.1 - East Float

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