

LPSD-1101

Comment ID	LPSD-1101
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	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.	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 * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>On-Site Sewer Flood Risk</p> <p>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>

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LPSP-1102

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Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	MUA-RA7.2

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
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LPSP-1103

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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.	
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Please state which Site ID/Reference this representation relates to.	MUA-RA7.1

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Legally compliant * Yes * No	
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LPSD-1105

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Comment ID	LPSD-1106
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	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.	MUA-RA7.3

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	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.	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.

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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>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-1107
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	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.	MUA-RA2.1

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
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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>	
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<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-1108

Comment ID	LPSP-1108
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 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	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.	EMP-SA4.3

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	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	
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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>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-1109
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	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.	EMP-SA4.4

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

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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.	
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<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>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>	

LPSD-1110

Comment ID	LPSD-1110
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	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.	EMP-SA4.2

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.	
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Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
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<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>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>	

LPSD-1111

Comment ID	LPSD-1111
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	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.	EMP-SA4.1

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

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complies 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. 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<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-1112
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	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.	EMP-SA5.1

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
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complies 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>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-1113

Comment ID	LPSP-1113
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 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	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.	EMP-SA5.4

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

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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.	
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<p>Assessment, please make them here.</p>	
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Comment ID	LPSD-1114
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	
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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	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.	EMP-SA5.3

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	No
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<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-1115

Comment ID	LPSP-1115
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
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Title	Coastal Protection, Flood Risk, Sustainable Drainage & Natural Water Management
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Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	EMP-SA5.2

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.	
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If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations	

<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>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>	

LPSD-1116

Comment ID	LPSD-1116
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	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.	EMP-RA6.4

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
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>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-1117
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	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.	EMP-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	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.	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 given 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>
complies 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>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>	

LPSD-1118

Comment ID	LPSD-1118
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	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.	EMP-RA6.1

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	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>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-1119
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	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.	EMP-RA6.2

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

	<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.	
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<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>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-1120
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	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.	EMP-RA7.1

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	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.	
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If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying 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>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>	

LPSD-1121

Comment ID	LPSD-1121
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	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.	EMP-RA8.1

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	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>
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hearing session(s)	
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:	
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	

Comment ID	LPSD-1122
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	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.	EMP-SA2.1

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

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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.	
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<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>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>	

LPSD-1123

Comment ID	LPSD-1123
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	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.	EMP-SA2.2

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

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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>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-1124
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	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	RES-SA4.11

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

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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.	
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<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>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>	

LPSD-1125

Comment ID	LPSD-1125
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	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-RA11.4

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
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Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
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If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying 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>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-1126
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	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-RA11.2

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	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>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-1127
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	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-RA11.5

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>On-Site Sewer Flood Risk</p> <p>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>

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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.	
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<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>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>	

LPSD-1128

Comment ID	LPSD-1128
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	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	RES-SA3.3

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	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.	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.

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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.	
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<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>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-1129
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	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	RES-SA4.6

<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>On-Site Sewer Flood Risk</p> <p>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>

	<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.	
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<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>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)	
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>	

LPSD-1130

Comment ID	LPSD-1130
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	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	RES-SA4.2

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	
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Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
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If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations	

<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>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>	

LPSD-1131

Comment ID	LPSD-1131
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	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	RES-SA4.7

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

	<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>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-1132
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	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	RES-SA6.4

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

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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.	
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<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>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>	

LPSD-1133

Comment ID	LPSD-1133
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	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	RES-SA6.7

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

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

Comment ID	LPSD-1134
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	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	RES-SA5.8

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

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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.	
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<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>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>	

LPSD-1135

Comment ID	LPSD-1135
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	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	RES-SA5.4

<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>On-Site Sewer Flood Risk</p> <p>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>

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Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
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If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying 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>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>	

LPSD-1136

Comment ID	LPSD-1136
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	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	RES-SA1.3

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	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.	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.	
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<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>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-1137
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	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	RES-SA5.2

<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>On-Site Sewer Flood Risk</p> <p>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>

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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.	
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<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>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>	

LPSD-1138

Comment ID	LPSD-1138
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	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-RA10.2

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

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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>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)	
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<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-1139
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	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-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 * Not Consistent with National Policy	
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	<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.	
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<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>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>	

LPSD-1140

Comment ID	LPSD-1140
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	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-RA5.1

<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>On-Site Sewer Flood Risk</p> <p>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>

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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>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>	

LPSD-1141

Comment ID	LPSD-1141
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	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-RA4.2

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	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>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-1142
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	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-RA4.3

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	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.	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>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-1143

Comment ID	LPSP-1143
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 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	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.	RA11

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.	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>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-1144

Comment ID	LPSP-1144
Person ID	1324011
Include files	LPSP-630,1144-1147-EM-Conroy Attach 1 of 2 25072507_Redacted.pdf LPSP-630, 1144-1147-EM-Conroy Attach 2 of 2 2507_Redacted.pdf
Consultee Name	Mr Ian Simpson
Position	
Company / Organisation	Countryside Properties
Agent ID	1324008
Agent Name	Mr Michael Conroy
Position	
Company / Organisation	Barton Willmore (Santec)
Number	Policy WS 3.2
Title	Housing Density
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.2

Please state which Site ID/Reference this representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the	Please refer to attachment (para 4.3 - 4.11) and Consortium representation.

<p>Local Plan is unsound. Please be as precise as possible.</p>	<p>Based on the above, Countryside Properties consider Policy WS3.2 will fail to meet the tests of soundness because it will fail to deliver family housing in line with the identified need established in the SHMA Update. It also does not provide an objective assessment of the deliverable and developable sites in Wirral and disregards the viability challenges of achieving the prescribed policy densities.</p> <p>It is clear the densities proposed by Policy WS3.2 are not viable for the sites identified in the Council's housing land supply and as set out below, will not deliver the housing mix set out in Policy WS3.4.</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	

<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>The Council must, therefore, reconsider the densities proposed in Policy WS3.2 and identify additional viable sites that can deliver the required housing mix in Wirral. This includes sites such as Countryside Properties site at Marsh Lane, Bebington. This can viably meet the identified need for family housing in the Borough in the first five years of the plan period.</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>Countryside Properties (UK) PLC representations raise serious concerns with the proposed housing requirement, spatial strategy, housing land supply and policies related to housing mix and density and affordable housing. It is important that we can explore these elements in person with the Inspector given they are fundamental to the Local Plan being found sound in accordance with national policy.</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-1145

Comment ID	LPSP-1145
Person ID	1324011
Include files	LPSP-630, 1144-1147-EM-Conroy Attach 2 of 2 2507_Redacted.pdf LPSP-630,1144-1147-EM-Conroy Attach 1 of 2 25072507_Redacted.pdf
Consultee Name	Mr Ian Simpson
Position	
Company / Organisation	Countryside Properties
Agent ID	1324008
Agent Name	Mr Michael Conroy
Position	
Company / Organisation	Barton Willmore (Santec)
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	Please refer to attachment (para 4.12-4.26) and Consortium representation.

Local Plan is unsound. Please be as precise as possible.	Based on the above and the assessment work prepared by Lichfield and Roger Hannah, we consider Policy WS3.3 fails to meet the tests of soundness. This is because based on the Council's claimed housing land supply, which is predominantly in Viability Zones 1 and 2 where affordable housing is not viable, it will fail to provide an appropriate mechanism and strategy to meet Wirral's objectively assessed affordable housing needs. It is clear the quantum of affordable housing required in Wirral cannot be addressed by the Council's urban intensification approach.
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	This level of affordable housing need coupled with the lack of deliverable and developable sites to meet the Borough's future housing needs represents exceptional circumstances to justify the release Green Belt sites, such as Countryside Properties site at Marsh Lane, Bebington, which are not subject to viability pressures to ensure affordable housing can be delivered.

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

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

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

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

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

<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>Countryside Properties (UK) PLC representations raise serious concerns with the proposed housing requirement, spatial strategy, housing land supply and policies related to housing mix and density and affordable housing. It is important that we can explore these elements in person with the Inspector given they are fundamental to the Local Plan being found sound in accordance with national policy.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

LPSD-1146

Comment ID	LPSD-1146
Person ID	1324011
Include files	LPSD-630,1144-1147-EM-Conroy Attach 1 of 2 25072507_Redacted.pdf LPSD-630, 1144-1147-EM-Conroy Attach 2 of 2 2507_Redacted.pdf
Consultee Name	Mr Ian Simpson
Position	
Company / Organisation	Countryside Properties
Agent ID	1324008
Agent Name	Mr Michael Conroy
Position	
Company / Organisation	Barton Willmore (Santec)
Number	Policy WS 3.4
Title	Housing Mix
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.4

Please state which Site ID/Reference this representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is	Please refer to attachment (para 4.27-4.40) and Consortium representation. As drafted, Policy WS3.4 does not reflect, and is unable to meet the identified need for three-or-more-bedroom properties identified–SHMA Update (65%) or Lichfields evidence (68%). Consequently, the policy fails to meet the tests of soundness because it does not meet the preferred mix of housing for Wirral and will not deliver sufficient family housing over the plan

unsound. Please be as precise as possible.	period based on the supply set out in Policy WS1.1. The policy is also not based on proportionate evidence and fails to demonstrate a mechanism for delivering 30% family housing in regeneration areas.
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 address this issue the Council must look to allocate additional sites outside of Regeneration Areas which are can viably deliver family housing to ensure the right homes are provided in the right locations across the Borough.

<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.</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),</p>	<p>Countryside Properties (UK) PLC representations raise serious concerns with the proposed housing requirement, spatial strategy, housing land supply and policies related to housing mix and density and affordable housing. It is important that we can explore these elements in person with the Inspector given they are fundamental to the Local Plan being found sound in accordance with national policy.</p>

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>

LPSD-1147

Comment ID	LPSD-1147
Person ID	1324011
Include files	LPSD-630, 1144-1147-EM-Conroy Attach 2 of 2 2507_Redacted.pdf LPSD-630,1144-1147-EM-Conroy Attach 1 of 2 25072507_Redacted.pdf
Consultee Name	Mr Ian Simpson
Position	
Company / Organisation	Countryside Properties
Agent ID	1324008
Agent Name	Mr Michael Conroy
Position	
Company / Organisation	Barton Willmore (Santec)
Number	Policy WP 8.1
Title	Green Belt
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 8.1

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	Please refer to attachment (para 5.4-5.38) and Consortium response.

Local Plan is unsound. Please be as precise as possible.	It is our view that rather than ensuring there is a sufficient variety of land available to meet the needs of different groups, the Council's spatial strategy is seeking to direct development to where there are available brownfield sites. This is a fundamentally flawed, unsound approach and completely undermines its ability to meet its housing need. There can therefore be no doubt that exceptional circumstances exist for Green Belt release.
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	Green Belt sites that are considered to perform poorly against the Green Belt purposes defined in the NPPF provide an obvious and necessary solution to meeting housing needs and should be prioritised for release for housing.

<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>We have demonstrated that the Site performs a weak contribution to the Green Belt and given the need to identify land which can realistically deliver family and affordable housing the Site should be considered suitable for release from the Green Belt.</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>Countryside Properties (UK) PLC representations raise serious concerns with the proposed housing requirement, spatial strategy, housing land supply and policies related to housing mix and density and affordable housing. It is important that we can explore these elements in person with the Inspector given they are fundamental to the Local Plan being found sound in accordance with national policy.</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-1148

Comment ID	LPSP-1148
Person ID	1245159
Include files	LPSP-1148-1149-EM-Harrison_Redacted.pdf
Consultee Name	Mrs Sue Harrison
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WP 6.1
Title	Conservation Areas
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 6.1
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>Yes</p>
<p>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</p>	<p>I support the proposals for Conservation Areas across the Wirral as outlined in Policy WP 6.1 Conservation Areas.</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>	<p>Yes</p>
<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>	

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

<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-1149
Person ID	1245159
Include files	LPSD-1148-1149-EM-Harrison_Redacted.pdf
Consultee Name	Mrs Sue Harrison
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Appendix 13
Title	Local Green Space
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	Appendix 13
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	I suggest all the proposals for Local Green Space including:- Ashton Park Rectory Road Paddocks Greenfield Estate St Bridget's Primary Field I propose a further additional Local Green Space to be designated in place of the housing development proposal for 35 houses on Land at Grange Hill Farm, West Kirby and the housing development at Grange Hill Farm (W.P. 6.3) be deleted.
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the	

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

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 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

LPSD-1150

Comment ID	LPSD-1150
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	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.	RA11

<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>On-Site Sewer Flood Risk</p> <p>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>

	<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>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>	