

LPSD-1151

Comment ID	LPSD-1151
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.	RA2

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 state which Site ID/Reference this representation relates to.	Birkenhead Regeneration Framework

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Please state which Site ID/Reference this representation relates to.	RA6

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Please state which Site ID/Reference this representation relates to.	RA8

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
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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.	RA9

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-1157
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.	RA1

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.	
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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-1158

Comment ID	LPSD-1158
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.	RA3

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-1159
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.	RA4

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>	

LPSP-1160

Comment ID	LPSP-1160
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.	RA7

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.	
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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)	
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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-1161
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	
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Company / Organisation	
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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.	RA5

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>	

LPSP-1162

Comment ID	LPSP-1162
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.	MPA-RA11.1

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>	

LPSP-1163

Comment ID	LPSP-1163
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.	MPA-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	
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-1164
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.	MPA-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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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-1165
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.	MPA-SA6.1

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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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>
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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-1166
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.	MPA-RA9.1

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>

	<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-1167
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.	MPA-RA1.1

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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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>	

LPSD-1168

Comment ID	LPSD-1168
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.	MPA-RA10.1

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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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-1169
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.	MPA-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.	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>	

LPSP-1170

Comment ID	LPSP-1170
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.	MPA-RA4.2

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	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.	
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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-1171

Comment ID	LPSD-1171
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.	MPA-RA5.1

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>

	<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>	

Comment ID	LPSD-1172
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.	MPA-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.	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>	

LPSD-1173

Comment ID	LPSD-1173
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.	MPA-RA7.1

<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>

	<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)	
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-1174
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.	MPA-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>	

LPSP-1175

Comment ID	LPSP-1175
Person ID	1323975
Include files	LPSP-620, 622-627, 1175-1177-EM-Dennis-Attach 17 of 17_Redacted.pdf
Consultee Name	Mr Peter Carus
Position	
Company / Organisation	Miller Homes
Agent ID	1244620
Agent Name	Rebecca Dennis
Position	
Company / Organisation	Pegasus Group
Number	
Title	Vision
To which part of the Local Plan does this representation relate?	Policy
<ul style="list-style-type: none"> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment 	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	vision
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachments and consortium rep The Council have not provided any evidence to justify the small-scale incremental development envisioned within the towns and villages of the west of Wirral and that they will remain stable and thrive over the plan period, and thus that the Vision is sound. If found to be unsound, further consideration would need to be given to how the towns and villages of the west of Wirral can thrive over the plan period. This could include, for example, going beyond the envisaged small-scale incremental development in a way which is aspirational but deliverable to address the issues faced by these towns and villages over the plan period.

as precise as possible.	Also see attached document and to be read alongside consortium rep
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	If found to be unsound,further consideration would need to be given to how the towns and villages of the west of Wirral can thrive over the plan period. This could include, for example, going beyond the envisaged small-scale incremental development in a way which is aspirational but deliverable to address the issues faced by these towns and villages over the plan period.

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

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

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

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

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

LPSD-1176

Comment ID	LPSD-1176
Person ID	1323975
Include files	LPSD-620, 622-627, 1175-1177-EM-Dennis-Attach 17 of 17_Redacted.pdf
Consultee Name	Mr Peter Carus
Position	
Company / Organisation	Miller Homes
Agent ID	1244620
Agent Name	Rebecca Dennis
Position	
Company / Organisation	Pegasus Group
Number	Policy WS 5
Title	Strategy for Green and Blue Infrastructure, Open Space, Biodiversity, and Landscape Protection
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	3.122
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	<p>The status of the potential Hoylake Langfields Local Wildlife Site is ambiguous, and it serves no purpose since there are no policies in the Submission Draft Plan which refer to the potential Local Wildlife Sites. If the status and purpose of the potential Hoylake Langfields Local Wildlife Site is not clarified or justified, then it should be removed from this figure, as it has not been justified.</p> <p>Two potential Local Wildlife Sites are shown on Figure 3.8 of the Submission Draft Plan; one on the eastern part of the Borough and one in the western part of the Borough. The same comments made to Figure 2.6 Nature Conservation Designations above, apply here</p>

as precise as possible.	
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	If the status and purpose of the potential Hoylake Langfields Local Wildlife Site is not clarified or justified, then it should be removed from this figure, as it has not been justified.

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

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

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

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

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

LPSP-1177

Comment ID	LPSP-1177
Person ID	1323975
Include files	LPSP-620, 622-627, 1175-1177-EM-Dennis-Attach 17 of 17_Redacted.pdf
Consultee Name	Mr Peter Carus
Position	
Company / Organisation	Miller Homes
Agent ID	1244620
Agent Name	Rebecca Dennis
Position	
Company / Organisation	Pegasus Group
Number	Policy WS 1.1
Title	Homes
To which part of the Local Plan does this representation relate?	Site
* Paragraph(s)	
* Policy	
* Site	
* Policies Map	
* Sustainability Appraisal	
* Habitat Regulations Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this	omission sites GB south and east and north of Saughall Massie Road

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

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

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>	

LPSD-1178

Comment ID	LPSD-1178
Person ID	1248487
Include files	LPSD-653, 1178-1181 and 1183-1186-EM-Shuker Attach 3 of 3 2507_Redacted.pdf LPSD-653, 1178-1181 and 1183-1186-EM-Shuker Attach 1 of 3 2507_Redacted.pdf LPSD-653, 1178-1181 and 1183-1186-EM-Shuker Attach 2 of 3 2507_Redacted.pdf
Consultee Name	Mr Mark Turner
Position	
Company / Organisation	Birkenhead School
Agent ID	1248632
Agent Name	Mr Paul Shuker
Position	Director - Planning, Development and Regeneration
Company / Organisation	Lambert Smith Hampton
Number	Policy WS 3.1
Title	Housing Design Standards
To which part of the Local Plan does this representation relate?	Policy
* Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.1

Please state which Site ID/Reference this representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	The School fully supports the key drivers to housing design standards and the transition to zero carbon standards in new build dwellings.
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is	

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

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

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
 * No, I do not wish to participate in hearing session(s)
 * Yes, I wish to participate in hearing session(s)

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

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

The School has not been positively engaged with as part of the local plan process, and in their view the investment plans and positive development plans have been wholly disregarded by the LPA despite the plans contributing significantly to know actions in the PPOSS. As such the School would like to attend the hearing sessions.

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-1179

Comment ID	LPSD-1179
Person ID	1248487
Include files	LPSD-653, 1178-1181 and 1183-1186-EM-Shuker Attach 1 of 3 2507_Redacted.pdf LPSD-653, 1178-1181 and 1183-1186-EM-Shuker Attach 3 of 3 2507_Redacted.pdf LPSD-653, 1178-1181 and 1183-1186-EM-Shuker Attach 2 of 3 2507_Redacted.pdf
Consultee Name	Mr Mark Turner
Position	
Company / Organisation	Birkenhead School
Agent ID	1248632
Agent Name	Mr Paul Shuker
Position	Director - Planning, Development and Regeneration
Company / Organisation	Lambert Smith Hampton
Number	Policy WS 3.2
Title	Housing Density
To which part of the Local Plan does this representation relate?	Policy
* Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.2

Please state which Site ID/Reference this representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is	The Noctorum Field sits in the Zone 1 of the Noctorum Ridge residential zone area that has its own design criteria, which supports a housing density of just 10 dwellings per hectare. Extant Policy HS5 of the UDP covers this. The outline planning application (LPA Ref: OUT/21/01516)) was refused on the basis of having a housing density of 15 dwellings per hectare which was considered too high against the 10 dph aspiration in Policy HS5 and would therefore have an impact on the local character of the area. Therefore, the School welcomes the

<p>unsound. Please be as precise as possible.</p>	<p>policy change in terms of housing density and provides a range of minimum density across four residential density zones. The Noctorum Field site falls outside these zones and therefore must achieve efficient use of land having regard to the prevailing character of the area. Sites of an area of 1 ha should seek to achieve a minimum of 30 dwellings per hectare unless it can be demonstrated that it would not be appropriate having regard to site characteristics. The School still argue that a 10 dph density level is still low and the prevailing local character area in Noctorum Ridge is much higher than 10 dph prescribed and should be reviewed, therefore there needs to be a case by case analysis undertaken and this requirement is currently absent in the local plan.</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	

<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>If 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>The School has not been positively engaged with as part of the local plan process, and in their view the investment plans and positive development plans have been wholly disregarded by the LPA despite the plans contributing significantly to know actions in the PPOSS. As such the School would like to attend the hearing sessions.</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-1180

Comment ID	LPSD-1180
Person ID	1248487
Include files	LPSD-653, 1178-1181 and 1183-1186-EM-Shuker Attach 2 of 3 2507_Redacted.pdf LPSD-653, 1178-1181 and 1183-1186-EM-Shuker Attach 3 of 3 2507_Redacted.pdf LPSD-653, 1178-1181 and 1183-1186-EM-Shuker Attach 1 of 3 2507_Redacted.pdf
Consultee Name	Mr Mark Turner
Position	
Company / Organisation	Birkenhead School
Agent ID	1248632
Agent Name	Mr Paul Shuker
Position	Director - Planning, Development and Regeneration
Company / Organisation	Lambert Smith Hampton
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	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	The School welcomes a more tiered approach to affordable housing to that previously adopted in the UDP. The subject site is located in a Viability Zone 2 area that requires 10% affordable housing. The School also welcomes WS3.3 E, as the proposed phasing will allow market housing to be delivered first. In addition, the School supports WS 3.3 G that recognises that not all projects or cases can deliver affordable housing on site, therefore the proposed policy allows for off-site provision or equivalent payment in lieu of affordable housing and will be only be considered if it can be demonstrated that on site provision would not be practicable.
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is	

unsound. Please be as precise as possible.	
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary	The School would suggest that this needs to be revised to state suitable and practicable as from our experience there are some locations where affordable housing may not be suitable for a variety of reasons and the change in text will allow some flexible be had for each case.

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

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
 * No, I do not wish to participate in hearing session(s)
 * Yes, I wish to participate in hearing session(s)

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

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

The School has not been positively engaged with as part of the local plan process, and in their view the investment plans and positive development plans have been wholly disregarded by the LPA despite the plans contributing significantly to know actions in the PPOSS. As such the School would like to attend the hearing sessions.

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

LPSD-1181

Comment ID	LPSD-1181
Person ID	1248487
Include files	LPSD-653, 1178-1181 and 1183-1186-EM-Shuker Attach 1 of 3 2507_Redacted.pdf LPSD-653, 1178-1181 and 1183-1186-EM-Shuker Attach 3 of 3 2507_Redacted.pdf LPSD-653, 1178-1181 and 1183-1186-EM-Shuker Attach 2 of 3 2507_Redacted.pdf
Consultee Name	Mr Mark Turner
Position	
Company / Organisation	Birkenhead School
Agent ID	1248632
Agent Name	Mr Paul Shuker
Position	Director - Planning, Development and Regeneration
Company / Organisation	Lambert Smith Hampton
Number	Policy WS 3.4
Title	Housing Mix
To which part of the Local Plan does this representation relate?	Policy
* Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.4

Please state which Site ID/Reference this representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	The School fully supports the policy, and argue that WS3.4 (J) (2) of the local plan fully supports the School ambitions to release the Noctorum Field site. The release will allow the school to reinvest in sports facilities at the School but also at the two rugby clubs (Old Parkonians and Prenton) to provide quantitative and qualitative improvements to overall sport facilities and pitches that will bring significant social value to the Borough through improved sporting infrastructure
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is	

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

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

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

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

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

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

The School has not been positively engaged with as part of the local plan process, and in their view the investment plans and positive development plans have been wholly disregarded by the LPA despite the plans contributing significantly to know actions in the PPOSS. As such the School would like to attend the hearing sessions.

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-1183

Comment ID	LPSD-1183
Person ID	1248487
Include files	LPSD-653, 1178-1181 and 1183-1186-EM-Shuker Attach 2 of 3 2507_Redacted.pdf LPSD-653, 1178-1181 and 1183-1186-EM-Shuker Attach 3 of 3 2507_Redacted.pdf LPSD-653, 1178-1181 and 1183-1186-EM-Shuker Attach 1 of 3 2507_Redacted.pdf
Consultee Name	Mr Mark Turner
Position	
Company / Organisation	Birkenhead School
Agent ID	1248632
Agent Name	Mr Paul Shuker
Position	Director - Planning, Development and Regeneration
Company / Organisation	Lambert Smith Hampton
Number	Policy WS 5.1
Title	Green and Blue Infrastructure Networks
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 5.1

Please state which Site ID/Reference this representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is	Please refer to attachment. The School object to the draft allocation of the Noctorum Field site under LGS-SA3.3 which would allocate it as a Local Green Space under Policy WS5.1 As set out above there is no evidence to confirm that this site should be safeguarded for green infrastructure and therefore its draft allocation is unsound against the NPPF and the NPPG.

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

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

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
 * No, I do not wish to participate in hearing session(s)
 * Yes, I wish to participate in hearing session(s)

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

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

The School has not been positively engaged with as part of the local plan process, and in their view the investment plans and positive development plans have been wholly disregarded by the LPA despite the plans contributing significantly to know actions in the PPOSS. As such the School would like to attend the hearing sessions.

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

Comment ID	LPSD-1184
Person ID	1248487
Include files	LPSD-653, 1178-1181 and 1183-1186-EM-Shuker Attach 1 of 3 2507_Redacted.pdf LPSD-653, 1178-1181 and 1183-1186-EM-Shuker Attach 3 of 3 2507_Redacted.pdf LPSD-653, 1178-1181 and 1183-1186-EM-Shuker Attach 2 of 3 2507_Redacted.pdf
Consultee Name	Mr Mark Turner
Position	
Company / Organisation	Birkenhead School
Agent ID	1248632
Agent Name	Mr Paul Shuker
Position	Director - Planning, Development and Regeneration
Company / Organisation	Lambert Smith Hampton
Number	Appendix 13
Title	Local Green Space
To which part of the Local Plan does this representation relate?	Policy
* Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	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	
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	The school objects to the inclusion of site reference LGS-SA3.3 in Appendix, whereby Noctorum Lane Sports Ground is allocated as a Local Green Space.

<p>Local Plan is unsound. Please be as precise as possible.</p>	<p>The position is unclear from Wirral, the PPOSS (2016 and 2021) advises that Noctorum Field should be a playing pitch that is retained, given the deficiency of sports pitches in the local area, but the current local plan is removing it from such protection and then allocating it as green open space. This is in the context that Wirral Council sought to object to the loss of the sport pitch due to a known deficiency.</p> <p>The Planning Practice Guidance advises that land in private ownership can be considered for local green space designation, including land with no public access. Again, we consider that the proposed designation of the site in the Local Plan points to a misinterpretation of the national guidance in respect of land in private ownership. Whilst land in private ownership can be considered for local green space designation, this does not mean the private ownership of a site should be disregarded. We consider that land with no public access considered for designation would need to be of exceptional and demonstrable importance to the local community for designation to be appropriate. The private ownership and lack of public access was an important consideration in our assessment of whether the site meets the local green space criteria set out in the NPPF, that informed our conclusion that the amenity grassland/playing fields area of the site does not meet the NPPF criteria for Local Green Space designation.</p> <p>We consider that the Council has not engaged with Birkenhead School in any meaningful way with regards to the proposed designation of the site and in no way agreed a way forward as is recommended in the LGSD. Birkenhead School was not notified when the site was put forward for designation. The Council consulted on the LGSD and the draft assessment of the site in July 2021, which Birkenhead School responded to. We acknowledge that limited amendments to the final LGSD were subsequently made.</p> <p>The assessment of the site contained within the LGSD report is limited and a detailed site analysis was either not completed by the Council or was or not made available publicly or to Birkenhead School as part of the emerging Local Plan evidence base.</p> <p>We understand from the LGSD that the main thrust of the sites inclusion was pursued by the opposition group to the aforementioned planning application, commonly known as the NRRA. To note the NRRA are an active opposition group who object to any release of the Noctorum Field for development and want to see it preservation. Therefore it is very disappointing that the Council (and LUC as their consultant) actively ensued engagement with a third party group instead of proper and reasonable engagement with the landowner, who are very well respected education provided and stakeholder in the wider community .</p> <p>Birkenhead School has been afforded limited opportunity to inform and respond to the Council's assessment of the site, extending to this relatively late submission draft stage of the Local Plan preparation, and to challenge the proposed Local Green Space designation. We contend that the approach by the Council is seriously flawed and is unsound and requires fundamental review before the site can be considered for designation. The draft Local Green Space allocation would also inadvertently damage the future usability of the site in the future for sports use which could counter the recommendations in the PPOSS.</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</p>	

<p>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>As set out below the playing pitch is surplus to the School's requirement for academic purposes but should either be allocated under Appendix 12 as a sport pitch or as proposed by the School should be allocated under Policy WP3.3, The School suggest that if the pitch is to be retained as sport pitch then it should be referenced SR- SA3.15 under urban sports facilities (RH3) within SA3 (suburban Birkenhead). Alternatively under school playing fields.</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>The School has not been positively engaged with as part of the local plan process, and in their view the investment plans and positive development plans have been wholly disregarded by the LPA despite the plans contributing significantly to know actions in the PPOSS. As such the School would like to attend the hearing sessions.</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-1185

Comment ID	LPSD-1185
Person ID	1248487
Include files	LPSD-653, 1178-1181 and 1183-1186-EM-Shuker Attach 2 of 3 2507_Redacted.pdf LPSD-653, 1178-1181 and 1183-1186-EM-Shuker Attach 3 of 3 2507_Redacted.pdf LPSD-653, 1178-1181 and 1183-1186-EM-Shuker Attach 1 of 3 2507_Redacted.pdf
Consultee Name	Mr Mark Turner
Position	
Company / Organisation	Birkenhead School
Agent ID	1248632
Agent Name	Mr Paul Shuker
Position	Director - Planning, Development and Regeneration
Company / Organisation	Lambert Smith Hampton
Number	Policy WS 10.6
Title	Open Space
To which part of the Local Plan does this representation relate?	Policy
* Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 10.6

Please state which Site ID/Reference this representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	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	The School objects to Policy WS10.6 in that the wording is not consistent with paragraph 99 a, b and c of the NPFF and therefore is not sound.

Local Plan is unsound. Please be as precise as possible.	We also note that there is no reference to the need to improve rugby facilities in paragraph 3.225, the proposed release of Noctorum Field for development would allow significant investment in Prenton and Old Parkonians to be realised, and that which accords with key actions in the PPOSS, as well as new investment in a sports hall at Birkenhead school. These clear social infrastructure benefits have not been considered by Wirral Council despite being known about since 2019 through active development management engagement
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	The draft criteria of P and Q for policy WS10.6 needs to be amended to reflect the NPPF, as follows: 3. an up-to-date needs assessment demonstrates that the site is surplus to requirements for any alternative identified open space or recreational purpose

<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>The loss of grass sports pitches and facilities for outdoor sport or children's play will not be permitted unless they are replaced by equal or better provision of quality and quantity on an alternative and suitable location.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>If you wish to participate in the</p>	<p>The School has not been positively engaged with as part of the local plan process, and in their view the investment plans and positive development plans have been wholly disregarded by the LPA despite the plans contributing significantly to know actions in the PPOSS. As such the School would like to attend the hearing sessions.</p>

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-1186

Comment ID	LPSD-1186
Person ID	1248487
Include files	LPSD-653, 1178-1181 and 1183-1186-EM-Shuker Attach 1 of 3 2507_Redacted.pdf LPSD-653, 1178-1181 and 1183-1186-EM-Shuker Attach 3 of 3 2507_Redacted.pdf LPSD-653, 1178-1181 and 1183-1186-EM-Shuker Attach 2 of 3 2507_Redacted.pdf
Consultee Name	Mr Mark Turner
Position	
Company / Organisation	Birkenhead School
Agent ID	1248632
Agent Name	Mr Paul Shuker
Position	Director - Planning, Development and Regeneration
Company / Organisation	Lambert Smith Hampton
Number	Policy WP 3.3
Title	Residential Sites
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WP 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	The School objects to the current Table of allocated sites, notwithstanding there is a current appeal in relation to the Noctorum Field, the release of this site will deliver significant benefits to the wider community including sport investment in two established rugby clubs and the existing Sport Hall at the School. As confirmed early, the Council in its statement of case confirms

Local Plan is unsound. Please be as precise as possible.	that the site is in principle acceptable for residential purposes and the planning application has shown there are no know environment constraints to the release of the site for residential uses.
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	The School requests that the site is allocated in WP3.3 J, and that the following amendments are made to include the site as a future residential use. (see page 27 of attachment for table change)

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

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

The School has not been positively engaged with as part of the local plan process, and in their view the investment plans and positive development plans have been wholly disregarded by the LPA despite the plans contributing significantly to know actions in the PPOSS. As such the School would like to attend the hearing sessions.

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

Comment ID	LPSD-1187
Person ID	1277283
Include files	LPSD-754, 938,1187-1193, 1196, 1200-1202, 1338-1342, 1348-1360, 1365-1370, 1372, 1374-1375, 1377-1378, 1384-1386 & 1422-1424-EM-Harding Attach 2207_Redacted.pdf
Consultee Name	Mr Ross Harding
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Part 2
Title	The Places and Our Vision
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policies Map
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	Main
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>please refer to attachment</p> <p>The proposals map does not show proposed Local Wildlife Sites (LWS) and should do. This includes Hoylake Langfields (NIA-4), Ditton Lane Nature Area (NIA-4) and Bidston Moss Community Woodland (NIA-4). These are all shown on Fig 2.6.</p>

<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</p>	<p>The proposals map does not show proposed Local Wildlife Sites (LWS) and should do. This includes Hoylake Langfields (NIA-4), Ditton Lane Nature Area (NIA-4) and Bidston Moss Community Woodland (NIA-4). These are all shown on Fig 2.6.</p>

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

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

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

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

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

* **Yes**

* **No**

Comment ID	LPSD-1188
Person ID	1277283
Include files	LPSD-754, 938,1187-1193, 1196, 1200-1202, 1338-1342, 1348-1360, 1365-1370, 1372, 1374-1375, 1377-1378, 1384-1386 & 1422-1424-EM-Harding Attach 2207_Redacted.pdf
Consultee Name	Mr Ross Harding
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Part 1
Title	Introduction and Background
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	1.3 1.4 1.7, 1.29
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>please refer to attachment</p> <p>Para 1.7</p> <p>CWT welcomes the focus that is placed on tackling climate change and agrees that this is a cross cutting issue affecting different policy areas.</p> <p>Para 1.29- CWT has no objections to the inclusion of a user guide. However, there are inconsistencies in the information presented. For example, why is Policy WSS "Strategy for Green and Blue Infrastructure ... "</p>

	flagged up as being particularly relevant for housing development but not for commercial or mixed-use developments? It may be better to move the detail here into a Supplementary Planning Document whilst retaining a statement in the Plan stressing that all policies must be read together.
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	It may be better to move the detail of the User Guide here into a Supplementary Planning Document whilst retaining a statement in the Plan stressing that all policies must be read together.

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

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

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

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

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

Comment ID	LPSD-1189
Person ID	1277283
Include files	LPSD-754, 938,1187-1193, 1196, 1200-1202, 1338-1342, 1348-1360, 1365-1370, 1372, 1374-1375, 1377-1378, 1384-1386 & 1422-1424-EM-Harding Attach 2207_Redacted.pdf
Consultee Name	Mr Ross Harding
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 1
Title	The Development and Regeneration Strategy for Wirral 2021 - 2037
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer to attachment In order to provide greater clarity and to ensure that new developments include measures to address climate change wherever possible CWT recommend the following specific changes in this section: "A. Within the period 2021- 2037 the Local Plan strategy will move the Council toward a zero-carbon future with high quality urban regeneration, economic transformation and environmental protection and enhancement. Developments shall support Wirral becoming carbon neutral by 2041 through, wherever Feasible and practicable:"

<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</p>	<p>CWT recommend the following specific changes in this section: "A. Within the period 2021 – 2037 the Local Plan strategy will move the Council toward a zero-carbon future with high quality urban regeneration, economic transformation and environmental protection and enhancement. Developments shall support Wirral becoming carbon neutral by 2041 through, where relevant practicable:"</p>

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

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

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

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

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

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

Comment ID	LPSD-1190
Person ID	1277283
Include files	LPSD-754, 938,1187-1193, 1196, 1200-1202, 1338-1342, 1348-1360, 1365-1370, 1372, 1374-1375, 1377-1378, 1384-1386 & 1422-1424-EM-Harding Attach 2207_Redacted.pdf
Consultee Name	Mr Ross Harding
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 3.2
Title	Housing Density
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.2
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer to attachment Policy WS3.2 Housing Density CWT does not object in principle to the minimum housing densities proposed here but welcomes the qualification in clauses Band C that the proposed densities may not be appropriate on all sites in the relevant areas. This may be due for example to the need to protect and enhance biodiversity interests.

<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</p>	<p>apply "Any part of the allocation site found to meet Cheshire LWS criteria will be designated as a LWS, enhanced and retained (with an adequate buffer) within the allocation."</p>

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

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

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

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

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

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

Comment ID	LPSD-1191
Person ID	1277283
Include files	LPSD-754, 938,1187-1193, 1196, 1200-1202, 1338-1342, 1348-1360, 1365-1370, 1372, 1374-1375, 1377-1378, 1384-1386 & 1422-1424-EM-Harding Attach 2207_Redacted.pdf
Consultee Name	Mr Ross Harding
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 4.2
Title	Designated Employment Areas
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policies Map
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	main
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer to attachment WS 4.1 (think error should read 4.2) overlaps Prenton Dell and Claypit LWS (LWS-SA8.46) on the policies map. This must be amended to exclude the boundary of the LWS to ensure consistency with national policy

<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</p>	<p>WS 4.1 (think error should read 4.2) overlaps Prenton Dell and Claypit LWS (LWS-SA8.46) on the policies map. This must be amended to exclude the boundary of the LWS to ensure consistency with national policy</p>

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

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

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

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

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

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

Comment ID	LPSD-1192
Person ID	1277283
Include files	LPSD-754, 938,1187-1193, 1196, 1200-1202, 1338-1342, 1348-1360, 1365-1370, 1372, 1374-1375, 1377-1378, 1384-1386 & 1422-1424-EM-Harding Attach 2207_Redacted.pdf
Consultee Name	Mr Ross Harding
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 4.4
Title	Tourism
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 4.4
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer to attachment Policy WS 4.4 Tourism We consider that Policy WS 4.4 could result in tourism development of a scale that increases recreational pressure on the nearby internationally designated sites of nature conservation, thereby potentially causing significant harm. National legislation requires that new development must avoid causing harm to such sites: • In line with the biodiversity harm avoidance, mitigation and compensation hierarchy as required by national

	<p>planning policy (NPPF 2021 - Policy 180a), and;</p> <ul style="list-style-type: none"> • By maintaining the character of the undeveloped coast, while improving public access to it where appropriate (NPPF 2021- Policy 174c). <p>Therefore, to ensure compliance with national planning policy an additional policy is required in this section, we suggest:</p> <p>N. Proposals for coastal tourism will only be supported if:</p> <p>N.1 They can demonstrate there will be no adverse impact on designated European Sites of nature conservation or their supporting and functionally linked habitats, in line with the biodiversity harm avoidance. mitigation and compensation hierarchy:</p> <p>N.2 They are subject to the completion of additional project-level screening and assessment under the Habitats Regulations where appropriate:</p> <p>N.3 They maintain the character of the undeveloped coast, while improving public access to it where appropriate, and:</p> <p>N.4 They provide measurable net gains for biodiversity.</p>
<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	

<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Therefore, to ensure compliance with national planning policy an additional policy is required in this section, we suggest:</p> <p>N. Proposals for coastal tourism will only be supported if:</p> <p>N.1 They can demonstrate there will be no adverse impact on designated European Sites of nature conservation or their supporting and functionally linked habitats, in line with the biodiversity harm avoidance, mitigation and compensation hierarchy;</p> <p>N.2 They are subject to the completion of additional project-level screening and assessment under the Habitats Regulations where appropriate;</p> <p>N.3 They maintain the character of the undeveloped coast, while improving public access to it where appropriate, and;</p> <p>N.4 They provide measurable net gains for biodiversity.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to</p>	

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

Comment ID	LPSD-1193
Person ID	1277283
Include files	LPSD-754, 938,1187-1193, 1196, 1200-1202, 1338-1342, 1348-1360, 1365-1370, 1372, 1374-1375, 1377-1378, 1384-1386 & 1422-1424-EM-Harding Attach 2207_Redacted.pdf
Consultee Name	Mr Ross Harding
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 5.1
Title	Green and Blue Infrastructure Networks
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 5.1
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	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer to attachment Policy WS 5.1 Green and Blue Infrastructure Networks CWT supports this policy in principle. However, clause A1 should be changed to also prevent harm to green and blue infrastructure (at present it just refers to "loss of"). The cross reference to the mitigation hierarchy should more accurately refer to "national policy" rather than "national legislation". We suggest the following revised wording: "A. Development proposals will contribute to high quality, coherent and resilient networks of blue and green

	<p>infrastructure in Wirral. This will be achieved by:</p> <p>1. Protecting existing green and blue infrastructure and ecological assets and networks. The loss of or harm to green and blue infrastructure is unacceptable and would only be allowed in exceptional circumstances and where any harm would be mitigated or as a last resort compensated in line with national policy."</p>
<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	

<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>"A. Development proposals will contribute to high quality, coherent Development proposals must ensure that the biodiversity assets of the Borough are protected, enhanced and functionally connected within coherent and resilient ecological networks. Biodiversity Net Gain will be delivered appropriately in response to the site characteristics and location:"</p> <p>ent and resilient networks of blue and green infrastructure in Wirral. This will be achieved by:</p> <p>1. Protecting existing green and blue infrastructure and ecological assets and networks. The loss of or harm to green and blue infrastructure is unacceptable and would only be allowed in exceptional circumstances and where any harm would be mitigated or as a last resort compensated in line with national policy."</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	

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

LPSD-1194

Comment ID	LPSD-1194
Person ID	1324133
Include files	LPSD-718,1194-1195,1197,1199 and 1401-EM-Robinson Attach 1 of 2_2507_Redacted.pdf LPSD-718,1194-1195,1197,1199 and 1401-EM-Robinson Attach 2 of 2 2507_Redacted.pdf
Consultee Name	Mr John Jones
Position	
Company / Organisation	Port Dredging Ltd
Agent ID	1249017
Agent Name	Mr Phil Robinson
Position	Director
Company / Organisation	Pegasus Group
Number	Policy WS 3.1
Title	Housing Design Standards
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.1

Please state which Site ID/Reference this representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is	See para 4.12-4..16 (page 15) of attachment 1 {NDSS, Water Efficiency and accessibility standards not justified}

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

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

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

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

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

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

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

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-1195

Comment ID	LPSD-1195
Person ID	1324133
Include files	LPSD-718,1194-1195,1197,1199 and 1401-EM-Robinson Attach 2 of 2 2507_Redacted.pdf LPSD-718,1194-1195,1197,1199 and 1401-EM-Robinson Attach 1 of 2_2507_Redacted.pdf
Consultee Name	Mr John Jones
Position	
Company / Organisation	Port Dredging Ltd
Agent ID	1249017
Agent Name	Mr Phil Robinson
Position	Director
Company / Organisation	Pegasus Group
Number	Policy WS 3.2
Title	Housing Density
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.2

Please state which Site ID/Reference this representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is	It will be important to ensure that the prioritisation of higher density development and the use of brownfield land does not preclude the delivery of homes in sustainable locations to meet local needs.

<p>unsound. Please be as precise as possible.</p>	<p>the Wirral Density Study (February 2021) states that in developing the density policy, it will need to be accepted that some changes to local character will occur when implementing minimum densities, especially in the areas where a significant uplift may occur. A balance needs to be taken between these changes and establishing higher densities. There will be a need to ensure that the local character is not lost due to the emphasis on establishing higher densities. The Council will also need to give significant consideration to whether the need for greater density is sufficient to overlook the need to protect resident's amenity or provision of normal residential facilities.</p> <p>There is also limited evidence to suggest that the Council have given sufficient consideration to other policy requirements which may also impact on density and site layout including the use of the M4(2) and M4(3) standards, the nationally described space standards (NDSS), provision of cycle and bin storage, the mix of homes provided, the availability of EV Charging alongside parking, any implications of design coding and the provision of tree-lined streets, highways requirements, and the requirements in relation to biodiversity net gain, changes to the Building Regulations requirements in relation to heating and energy and the Future Homes Standard.</p> <p>There is a very real risk that to achieve the densities proposed the Council it may not be able to deliver on a number of these other policy requirements. It would therefore be beneficial to reconsider the reality of the density requirements alongside the impacts of all of the Council's policy requirements.</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the</p>	

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

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

Comment ID	LPSD-1196
Person ID	1277283
Include files	LPSD-754, 938,1187-1193, 1196, 1200-1202, 1338-1342, 1348-1360, 1365-1370, 1372, 1374-1375, 1377-1378, 1384-1386 & 1422-1424-EM-Harding Attach 2207_Redacted.pdf
Consultee Name	Mr Ross Harding
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 5.5
Title	Mitigating Recreational Disturbance on International Sites for Nature Conservation
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 5.5
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
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.	Comment. See our earlier comments regarding the Interim Approach. Generally, CWT supports the production of a LCR Recreational Disturbance and Avoidance Strategy and its inclusion in this policy, including the commitment to complete the full strategy early in the Plan period. CWT is however concerned that the government is considering changes to the regulatory regime affecting international sites. CWT considers it essential that, notwithstanding any changes to the legislation which may occur, there must be no weakening in the protection given to the European sites. We therefore consider it vital that the LCR Recreational Disturbance Avoidance and Mitigation Strategy (or something similar) is indeed finalised in an effective form early in the Plan period and adopted even if the national HRA regime which currently underpins it is removed or weakened.
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	

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

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

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

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

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

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

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

Comment ID	LPSD-1197
Person ID	1324133
Include files	LPSD-718,1194-1195,1197,1199 and 1401-EM-Robinson Attach 1 of 2_2507_Redacted.pdf LPSD-718,1194-1195,1197,1199 and 1401-EM-Robinson Attach 2 of 2 2507_Redacted.pdf
Consultee Name	Mr John Jones
Position	
Company / Organisation	Port Dredging Ltd
Agent ID	1249017
Agent Name	Mr Phil Robinson
Position	Director
Company / Organisation	Pegasus Group
Number	Policy WS 3.4
Title	Housing Mix
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.4

Please state which Site ID/Reference this representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is	Please refer to attachment This policy states (at Part I) that outside identified Regeneration Areas, a minimum of 70% of market dwellings will be developed for larger dwellings of three or more bedrooms, within Use Class C3. Within identified Regeneration Areas this should be a minimum of 30%.

<p>unsound. Please be as precise as possible.</p>	<p>Flexibility should be included within the policy as it may not be viable to achieve this requirement in all instances alongside other policy requirements and optional housing standards set out above. There will also be site-specific circumstances where this may not be achievable and housing mix matters are best considered on a case-by-case basis.</p> <p>This policy also highlights an issue with the Council's Development and Regeneration Strategy. Outside of identified Regeneration Areas, there is a desire to deliver larger properties to rectify the fact that within the Regeneration Areas, predominately smaller properties are to be delivered (dominated by apartment schemes)</p> <p>Given that the Development and Regeneration Strategy allows for limited housing growth outside of the Regeneration Areas, it is not clear how three bedroom and larger properties will be added to the housing stock of the Borough in any meaningful manner.</p> <p>This will result in further imbalance in the housing stock, which will be dominated by smaller properties. Whilst there is undoubtedly a need for such properties, it will not meet the housing needs of other housing groups (most notably family housing) at the scale required. This a particular concern given the 2021 SHMA Update concludes there to be strongest demand and need for three-bedroom properties</p> <p>A more balanced approach to housing delivery would result in the delivery of housing stock to meet a variety of housing mix needs and suitable development sites such as at Raby Hall Road, Raby Mere, Bromborough, which provides the opportunity to provide family housing and larger properties.</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in</p>	

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

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

LPSD-1198

Comment ID	LPSD-1198
Person ID	1248567
Include files	LPSD-1198, 1206-1226, 1229, 1231-1255, 1263 and 1264-EM-Hrycan Attach 2 of 2 2107_Redacted.pdf
Consultee Name	Emily Hrycan
Position	
Company / Organisation	Historic England
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	
Title	Overview of the Borough
To which part of the Local Plan does this representation relate?	Paragraph(s)
<ul style="list-style-type: none"> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment 	
Please state which paragraph number(s) this representation relates to.	2.14
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	There is no content within the overview of the Borough which sets out the historic environment of the Wirral and how it contributes to its special character and identity. This paragraph just states that the Borough has a rich heritage.

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

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-1199
Person ID	1324133
Include files	LPSD-718,1194-1195,1197,1199 and 1401-EM-Robinson Attach 1 of 2_2507_Redacted.pdf LPSD-718,1194-1195,1197,1199 and 1401-EM-Robinson Attach 2 of 2 2507_Redacted.pdf
Consultee Name	Mr John Jones
Position	
Company / Organisation	Port Dredging Ltd
Agent ID	1249017
Agent Name	Mr Phil Robinson
Position	Director
Company / Organisation	Pegasus Group
Number	Policy WS 12
Title	Monitoring and Review
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 12

Please state which Site ID/Reference this representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
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	para 4.28-4.33 (page 17) attachment 1

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

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

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

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

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

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

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

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

Comment ID	LPSD-1200
Person ID	1277283
Include files	LPSD-754, 938,1187-1193, 1196, 1200-1202, 1338-1342, 1348-1360, 1365-1370, 1372, 1374-1375, 1377-1378, 1384-1386 & 1422-1424-EM-Harding Attach 2207_Redacted.pdf
Consultee Name	Mr Ross Harding
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 6.3
Title	Masterplan 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.	WS 6.3
Please state which Site ID/Reference this representation relates to.	

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

<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</p>	<p>Comment. CWT supports the provision of master plans to ensure a comprehensive approach to development. However, clauses E and F should also be amended to include green and blue infrastructure alongside the other elements already listed.</p>

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

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

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

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

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