

LPSD-1251

Comment ID	LPSD-1251
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	Policy WP 8.4
Title	Conservation Areas
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.	WP 8.4
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.	<p>Historic England welcomes the inclusion of this policy. Development proposals whilst they are expected to preserve elements that positively contribute to a conservation area's significance there is also a need to enhance a conservation area through new development or improvements to existing characteristics such as those identified within the policy. This is in line with national policy requirements. The Policy as drafted does not always encourage enhancement in all areas of the policy and focuses heavily on preserve. Why would opportunities to enhance these not be supported as well?</p> <p>Therefore, in order to strengthen the policy, it needs to be amended to include references to 'enhance', so that it is in line with the NPPF.</p> <p>In addition, to support the implementation of this policy there should be a conservation area appraisal. The policy would benefit from providing reference to this, as this would reinforce the specific characteristics that the policy mentions. Otherwise, there is no evidence to endorse these requirements and also require applicants to refer to this source of information.</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 policy should be expanded to include reference to 'enhance' as well as the conservation area appraisal.</p> <p>In addition, to support the implementation of this policy there should be a conservation area appraisal. The policy would benefit from providing reference to this, as this would reinforce the specific characteristics that the policy mentions. Otherwise, there is no evidence to endorse these requirements and also require applicants to refer to this source of information.</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-1252
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	Policy WD 2.1
Title	Protecting Heritage Assets
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.	WD 2.1
Please state which Site ID/Reference this representation relates to.	

<p>Please state which Policies Map (Inset Map number(s)) this representation relates to.</p>	
<p>Legally compliant * Yes * No</p>	
<p>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>	Not Consistent with National Policy
<p>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</p>	The NPPF encourages proposals that both sustain and where appropriate, enhances heritage assets and Council's should support proposals that do so. In view of this and to ensure consistency with the approach to conservation areas in Policy WD 2.2 and Archaeological Assets (WD Policy 2.3) the title should be amended to just read heritage assets (without protecting).

<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 title be amended to read '<i>Heritage Assets</i>'.</p>

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

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

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

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

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

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

LPSP-1253

Comment ID	LPSP-1253
Person ID	1248567
Include files	LPSP-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	Policy WD 2.1
Title	Protecting Heritage Assets
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WD 2.1
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 Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>Historic England is concerned about the lack of a strategic historic environment policy within the Wirral Local Plan. The NPPF requires that Plans set out a positive strategy for the historic environment.</p> <p>We consider that the lack of a locally specific detailed policy to set out the strategy for the historic environment across the Wirral to be a serious omission.</p> <p>The NPPF requires that Plans set out a positive strategy for the historic environment, this includes strategic policies to deliver the conservation and enhancement of the historic environment at a local level.</p>

	<p>The drafted Policy WD2.1, only presents a framework for managing proposals affecting heritage assets. It does not set out spatially the elements that contribute to Wirral's unique character and provide detail on how this is going to be managed through a strategy and also wider proactive functions such as local lists, conservation area appraisals, heritage led regeneration etc.</p> <p>Without this, the Plan does not meet the requirements of the NPPF and therefore needs to be amended.</p>
<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you</p>	<p>The policy needs to be amended to ensure that it provides a strategic framework, that is locally specific to the Wirral. Historic England would be happy to provide additional support on this.</p>

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

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

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

If you wish to participate in the

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

LPSP-1254

Comment ID	LPSP-1254
Person ID	1248567
Include files	LPSP-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	Policy WD 2.2
Title	Conservation Areas
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.	WD 2.2
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	Historic England welcomes the inclusion of this policy. However, the policy would benefit through references to the specific area policies contained in the plan.
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	

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

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

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

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

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

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

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

LPSP-1255

Comment ID	LPSP-1255
Person ID	1248567
Include files	LPSP-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	Appendix 18
Title	Housing Allocations of 1-9 Units
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.	RES-SA4.16
Please state which Site ID/Reference this representation relates to.	

<p>Please state which Policies Map (Inset Map number(s)) this representation relates to.</p>	
<p>Legally compliant * Yes * No</p>	
<p>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</p>	
<p>Sound * Yes * No</p>	No
<p>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</p>	
<p>If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy</p>	Not Consistent with National Policy
<p>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</p>	<p>The Council has undertaken a heritage impact assessment to support the inclusion of this site in the plan which includes mitigation measures in relation to identified harm. As drafted, the Local Plan does not ensure that this essential element of the evidence base is incorporated within the individual site policies. This would provide guidance for those submitting applications for this allocation and would ensure that proposals conserve and enhance the historic environment, heritage assets and their setting in line with the requirements of the NPPF.</p> <p>Without this, the Plan cannot demonstrate that the site can be developed without harm to the historic environment.</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 policy be expanded to include reference to the need for proposals to take into account the heritage impact assessment and/or specific mitigation/enhancement measures.</p>

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

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

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

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

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

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

LPSP-1256

Comment ID	LPSP-1256
Person ID	1247777
Include files	LPSP-673,1230,1256, 1258-1260-EM-Smedley-Attachment 1 of 2_ 2507_Redacted LPSP-673,1230,1256, 1258-1260-EM-Smedley Attachment 2 of 2 2507_Redacted.pdf
Consultee Name	D Morgan Plc
Position	
Company / Organisation	
Agent ID	1324074
Agent Name	Ms Sarah Smedley
Position	Senior Planner
Company / Organisation	Peacock + Smith
Number	Policy WP 4.2
Title	Residential Sites
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WP 4.2
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment. A Local Wildlife Site designation should not be a determining factor as to whether a site is considered suitable for development or not. Site ref: 503, Former Goods Yard, Bebington – beside Bebington Station, beside the Merseyrail “gateway” Bebington station, should be allocated for residential development of “between 78-130 dwellings”.

as precise as possible.

- The Merseyrail “gateway” Bebington station is advertised by Merseyrail as the access point for tourists from Liverpool City Centre and wider Liverpool Region to access “globally influential” Port Sunlight Village and the pedestrian access to/from the station should be improved as part of the Visitor Economy Strategy aimed at regeneration
- Located within a 400m Transit Zone, the development of the site would bring about Transport Orientated Development (TOD).
- A Local Wildlife Site and Urban Open Space designations do not preclude development, as per NPPF Para 180(a) which supports development and our client is willing to collaborate with the Council in accordance with this Policy.
- The Council should adopt the approach at Para 3.10 of the Density Study which supports contributions to open space improvements rather than additional provision: “...Additionally, these sites are all within 10 minutes’ walk of a large public open space, recreational area or similar and as such there is some benefit to considering a contribution to these rather than further provision.”
- The Local Plan should follow the approach of Para 3.10 of the Density Study with respect to accessing “a large public open space, recreational area or similar” in utilising Open Spaces (New Ferry Park (6ha), Port Sunlight River Park (28ha), Port Sunlight Village (52ha) and the Oval Leisure Centre playing fields (8ha) and considering a contribution to these rather than further provision. This approach is entirely consistent with NPPF Para 180(a): “if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused”
- There are several opportunities in surrounding areas of Public Open Space accessing by walking/cycling proving for healthy lifestyles, well-being including mental health to enjoy these interconnected green space networks and relocate the butterfly habitat, including at the following: New Ferry Park (6ha), Port Sunlight River Park (28ha), Port Sunlight Village (52ha) and the Oval Leisure Centre playing fields (8ha) which all offer opportunities for urban greening/tree planting and rewilding. Considered together for an ‘urban forest’, they amount to 94ha, far larger than the 50ha “globally influential” Birkenhead Park. The immediately adjoining rail cutting of the Merseyrail line also provides opportunities for biodiversity enhancement as already achieved by Network Rail between the stations of Bebington and Port Sunlight.
- The emphasis on utilising and accessing nearby Public Open Spaces, recreational areas or similar in conjunction with the site’s location beside a Bebington “gateway” Merseyrail station, would satisfy NPPF Para 104(c) which seeks to ensure: “opportunities to promote walking, cycling and public transport use are identified and pursued...”

Site ref: 650 should be released from the Green Belt and allocated for residential development.

- A TPO does not preclude development.
- It should be acknowledged that the promoted site is within a Transit Zone, within 100m of a bus/rail interchange with the Merseyrail network. It is ideally located to deliver Transport Orientated Development (TOD).
- It should be acknowledged that NPPF Para 180(a) supports development and that our client remains committed to collaborating with the Council in satisfying this policy in relation to the trees present on the site: if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
- Any impacts to biodiversity can be off-set, either through the: o relocation of habitat on an alternative site o adequately mitigated, or o as a last resort, compensated for.
- Para 3.10 of the Density Study is supportive of NPPF Para 180(a), and confirms that contributions can be sought to enhancing off-site open space, recreational area or similar, rather than additional provision: “...Additionally, these sites are all within 10 minutes’ walk of a large public open space, recreational area or similar and as such there is some benefit to considering a contribution to these rather than further provision.”
- On the other side of the railway, there is a managed woodland (Lowfields Woodland) that is publicly accessible. Our client is supportive of further enhancement and management of this woodland and is open to collaborating with the Council on this matter.
- Located within 100m of Eastham Rake Merseyrail station, and close to many green infrastructure links for walking/cycling, allocation would satisfy NPPF Para 104 which requires the identification and pursual of sustainable transport means: “104. Transport issues should be considered from the earliest stages of plan-making and development proposals, so that: c) opportunities to promote walking, cycling and public transport use are identified and pursued...”
- Wirral’s own consultant at para 14.12 of the Environmental Sensitivity Study also emphasised this approach: “Access to public transport - any consideration of sites within the Green Belt would need to demonstrate, in accordance with Paragraph 142 of the NPPF, that all efforts have been made to prioritise sites that have the best access to public transport”

Site ref: 650 should be prioritised as it falls within a 400m Transit Zone, and is well-served by public transport, in accordance with NPPF Para 142: “Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and/or is well-served by public transport....

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	<p>Site ref: 503 [Former Goods Yard, Bebington – beside Bebington Station], beside the Merseyrail “gateway” Bebington station, should be allocated for residential development of “between 78-130 dwellings”.</p> <p>Site ref: 650 [Former Hooton Brick Works, Eastham Rake] should be released from the Green Belt and allocated for residential development.</p>

<p>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>Our client is a significant landholder on the Wirral and has submitted sites via the Call for Sites process for consideration in the Local Plan. Participation in the hearing sessions would allow us to take part in discussions surrounding the Council's Strategy, which, in its current form, we consider to be flawed. Presence at the hearings would also allow us to provide additional detail in relation to our client's omission sites and convey the considerable benefits they can offer.</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</p>	<p>Yes</p>

<p>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-1258

Comment ID	LPSP-1258
Person ID	1247777
Include files	LPSP-673,1230,1256, 1258-1260-EM-Smedley Attachment 2 of 2 2507_Redacted.pdf LPSP-673,1230,1256, 1258-1260-EM-Smedley-Attachment 1 of 2_ 2507_Redacted
Consultee Name	D Morgan Plc
Position	
Company / Organisation	
Agent ID	1324074
Agent Name	Ms Sarah Smedley
Position	Senior Planner
Company / Organisation	Peacock + Smith
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 Local Plan is unsound. Please be	Please refer to attachment. Site ref: 1949 Former Brick and Tile Works and disused Quarry, Prenton Dell on the urban edge has been promoted by our client throughout the Local Plan process but remains unallocated as it lies in the Green Belt although it is within a Transit Zone where higher density development can be accommodated. We recognise that the wider Prenton Dell area, comprising a valley and stream, is a feature which brings nature and recreational benefits to the community, and it is proposed to retain this area for continued use and enjoyment for healthy lifestyles and well-being benefitting mental health.

<p>as precise as possible.</p>	<p>The Council's strategy has been to promote development "east of the M53 motorway", where this former Brick and Tile Works is located.</p> <p>NPPF Para 180(a) supports development and does not preclude development at such a location; any impacts to biodiversity can be off-set.</p> <p>Para 3.10 of the Density Study confirms that contributions to public open space, recreational land or similar can be secured rather than necessarily further provision:</p> <p>"...Additionally, these sites are all within 10 minutes' walk of a large public open space, recreational area or similar and as such there is some benefit to considering a contribution to these rather than further provision."</p> <p>Prenton Dell comprising a valley and stream is within a two minute walk.</p> <p>A wide range of shopping, services and facilities exist within nearby Prenton Town Centre, within walking distance and along the high-frequency bus route along the A552.</p> <p>The high-frequency bus route accesses the Merseyrail Birkenhead-Chester line at Birkenhead Central, Hamilton Square and Green Lane stations. • Allocation of the site would satisfy NPPF Para 142 which requires sites in the Green Belt well served by public transport to be given first consideration. The site is located a short distance away from a high-frequency bus route, where buses run as frequently as every 4 minutes as they converge on the A552 "east of the M53 motorway". The site will deliver Transit Orientated Development (TOD):</p> <p>142. "Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and/or is well-served by public transport..."</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,</p>	

<p>soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>We would wish to see the Local Wildlife Site/Site of Biological Importance reduced to exclude that small part of the former quarry land</p> <ul style="list-style-type: none"> • Site ref: 1949 should be released from the Green Belt and allocated for residential development.
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? * No, I do not wish to</p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>Our client is a significant landholder on the Wirral and has submitted sites via the Call for Sites process for consideration in the Local Plan. Participation in the hearing sessions would allow us to take part in discussions surrounding the Council's Strategy, which, in its current form, we consider to be flawed. Presence at the hearings would also allow us to provide additional detail in relation to our client's omission sites and convey the considerable benefits they can offer.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

LPSP-1259

Comment ID	LPSP-1259
Person ID	1247777
Include files	LPSP-673,1230,1256, 1258-1260-EM-Smedley-Attachment 1 of 2_ 2507_Redacted LPSP-673,1230,1256, 1258-1260-EM-Smedley Attachment 2 of 2 2507_Redacted.pdf
Consultee Name	D Morgan Plc
Position	
Company / Organisation	
Agent ID	1324074
Agent Name	Ms Sarah Smedley
Position	Senior Planner
Company / Organisation	Peacock + Smith
Number	Policy WP 8
Title	Policy for the Rural Area
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WP 8
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment. • Site ref: 1950 should be released from the Green Belt and allocated for residential development. The site includes the former brick works “industrial” land that is no longer operational, but retains its “industrial” status and retains the approved existing perimeter landscape screen mounds which are permanent and the plan should recognise these features.

<p>as precise as possible.</p>	<ul style="list-style-type: none"> • Flood Zone 2 does not preclude development, as evidenced above when approval was granted for 257 dwellings on the Burton Biscuits site as recently as March 2020. Nothing has changed in terms of how a Flood Risk Area should be treated. • Our client's site is identified in Appendix C, page C-7 of the Environmental Sensitivity Study as being of "lower sensitivity to development": "there are areas of industrial and commercial developments on the urban edge in the north east of the LCA including landfill, mineral extraction, water treatment works and commercial units along the A553 Hoylake Road. These reduce tranquility and signal lower sensitivity to development". • Access to the former brick works "industrial" land is from Carr Lane of between 7-8m width which would be diverted into the proposed housing development and beyond this Carr Lane access to the "industrial" site the single-track Carr Lane would be stopped up for vehicular traffic to become a pedestrian/cycle -route over the Merseyrail level crossing, passing alongside the "Water Treatment Works" connected to Park Road and Bennetts Lane, connecting to the North Wirral Coastal Park in the vicinity of Hoylake Coastguard Station, improving lifestyles, well-being and mental health. • Located within the 400m Transit Zone of the proposed Town Meadow Merseyrail station, and close to many green infrastructure links for walking/cycling, including to the North Wirral Coastal Park and the Hoylake/Meols promenade, allocation would satisfy NPPF Para 104 which requires the identification and pursual of walking, cycling and public transport means: "104. Transport issues should be considered from the earliest stages of plan-making and development proposals, so that: c) opportunities to promote walking, cycling and public transport use are identified and pursued..." • Site ref: 1950 should be prioritised and pursued as it falls within a 400m Transit Zone of a (proposed) Merseyrail station, well-served by public transport, where Transit Orientated Development (TOD) should be supported, in accordance with NPPF Para 142: "Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and/or is well-served by public transport..." • Wirral's own consultant at para 14.12 of the Environmental Sensitivity Study also emphasised this approach: "Access to public transport - any consideration of sites within the Green Belt would need to demonstrate, in accordance with Paragraph 142 of the NPPF, that all efforts have been made to prioritise sites that have the best access to public transport".
<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>Site ref: 1950 [Former Brick Works, Carr Lane] should be released from the Green Belt and allocated for residential development.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to</p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>Our client is a significant landholder on the Wirral and has submitted sites via the Call for Sites process for consideration in the Local Plan. Participation in the hearing sessions would allow us to take part in discussions surrounding the Council's Strategy, which, in its current form, we consider to be flawed. Presence at the hearings would also allow us to provide additional detail in relation to our client's omission sites and convey the considerable benefits they can offer.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

LPSP-1260

Comment ID	LPSP-1260
Person ID	1247777
Include files	LPSP-673,1230,1256, 1258-1260-EM-Smedley Attachment 2 of 2 2507_Redacted.pdf LPSP-673,1230,1256, 1258-1260-EM-Smedley-Attachment 1 of 2_ 2507_Redacted
Consultee Name	D Morgan Plc
Position	
Company / Organisation	
Agent ID	1324074
Agent Name	Ms Sarah Smedley
Position	Senior Planner
Company / Organisation	Peacock + Smith
Number	Policy WM 3
Title	Safeguarding mineral reserves and infrastructure
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.	WM 3
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachments. Site ref: 1950 Former Brick Works, Carr Lane is safeguarded in the Local Plan for brick clay extraction (MSA-SA8.1). However, brick clay extraction ceased many years ago when the Brick Works ceased to manufacture bricks and closed. The area of the brickworks buildings is referred to as "industrial" in the Environmental Sensitivity Study and they have in the past decade had an "industrial" use.

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	<ul style="list-style-type: none"> For all the reasons outlined above a mineral extraction safeguarded area is no longer required and the designation should be removed, with the site used as a fishery with three lakes (Nordic Tarn, Dawpool, Rhuddlan Water) and with the remaining site allocated for housing within the Transit Zone of Town Meadow station for Transport Orientated Development (TOD). The Mineral Safeguarding Area should be removed from the site.

<p>Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<ul style="list-style-type: none"> • There is no prospect of mineral extraction restarting because there is no longer a brickworks and because clay is no longer of any economic value or potential use. The “industrial” former brickworks is incapable of restarting production and clay is incapable of being extracted where the three lakes (Nordic Tarn, Dawpool, Rhuddlan Water) have been created. • The Minerals Report (January 2022) and Merseyside Mineral Resource Study (MMRS, August 2008, 14 years old) should use the most up-to-date information to ensure designations are made on a sound basis, and to take account of Appendix 4 which sets out that the mineral is no longer of any economic value or potential use and Appendix 7 (Restoration and Aftercare Scheme). • The implementation of the approved Restoration and Aftercare scheme is substantially complete over the larger area of the former quarry, evidenced by the creation of three water lakes (Nordic Tarn, Dawpool, Rhuddlan Water) which are in use as a fishery, and this should be recognised as a valuable blue infrastructure asset with fishing benefiting well-being and mental health. • A small area of unrestored quarry remains. It is included in the promoted site ref: 1950 for a housing allocation together with the “industrial” former Brickworks and adjoining Grade 4 agricultural land. • Located within 400m Transit Zone of the proposed Town Meadow Merseyrail station, and close to many green infrastructure links for walking/cycling including to the North Wirral Coastal Park, allocation would satisfy NPPF Para 104 which requires the identification and pursuit of walking, cycling and public transport: “104. Transport issues should be considered from the earliest stages of plan-making and development proposals, so that: c) opportunities to promote walking, cycling and public transport use are identified and pursued...” • Site ref: 1950 should be prioritised as it falls within a 400m Transit Zone of a (proposed) Merseyrail station, well-served by public transport, where Transit Orientated Development (TOD) should be supported, in accordance with NPPF Para 142: “Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and/or is well-served by public transport...” • Wirral's own consultant at para 14.12 of the Environmental Sensitivity Study also emphasised this approach: “Access to public transport - any consideration of sites within the Green Belt would need to demonstrate, in accordance with Paragraph 142 of the NPPF, that all efforts have been made to prioritise sites that have the best access to public transport”
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s), please outline why</p>	

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-1261
Person ID	1323731
Include files	LPSD-471-490 and 1261-EM-Barton Attach 12 of 12 2207_Redacted.PDF
Consultee Name	Mrs Brigid Edwards
Position	
Company / Organisation	Taylor Wimpey
Agent ID	1323730
Agent Name	Mr Richard Barton
Position	
Company / Organisation	Avison Young
Number	Policy WS 10.4
Title	Facilities for Education, Health and Emergency Services
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 10.4
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	No
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please see submitted representations prepared by Avison Young on behalf of Taylor Wimpey UK Limited for comments on the soundness of the Local Plan and specific comments on the draft policy. Refer to Consortium response and attachment (Land at Barnston Rd).

as precise as possible.	<p>With regards to viability, Technical Paper 5: A Critique of the Viability Evidence (prepared by Roger Hannah) (enclosed at Appendix V) addresses contributions towards education and health. The representation states that the range of S106 assumptions made by the Council excludes any contribution towards health and education and the Council wishes to concentrate the vast majority of new development in Birkenhead where there will be a need for significant investment in local infrastructure, transport, schools, healthcare and public realm which are currently not included in any S106 contributions in the appraisals undertaken. As such, it is believed that the expected S106 contributions are being understated, resulting in an overestimation of Local Plan viability. This being the case, where an individual application is subsequently found to require significant additional contributions beyond those tested there will remain a need to complete site-specific viability appraisals to fully assess the impact of any additional obligations.</p> <p>Draft Policy WS 10.3 is not considered to be sound as it is not positively prepared, justified, effective or consistent with national policy for the reasons set out above and expanded in the Consortium Representations.</p> <p>The flaws of draft Policy WS 10.1 relate to the inconsistencies and miscalculations between the Infrastructure Delivery Plan and the CIL and Viability Assessment which is a fundamental issue with the whole Local Plan viability and therefore it will not be possible to rectify these soundness issues through the main modifications process.</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.	N/A
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the	N/A

<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>Please see submitted representations prepared by Avison Young on behalf of Taylor Wimpey UK Limited for comments on the soundness of the Local Plan and specific comments on the draft policy.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? * No, I do not wish to participate in 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>It is necessary for Avison Young to attend and participate in the examination, on behalf of Taylor Wimpey UK Limited, in order to discuss the technical evidence and strategy in relation to housing requirement and delivery and the need for Green Belt release.</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-1262
Person ID	1277274
Include files	LPSD-1262, 1265, 1268-1270 and 1390-EM-Leigh Attach 2507_Redacted.pdf
Consultee Name	Ms Angela Leigh
Position	Planning & Development Lead Adviser
Company / Organisation	Natural England (Coast and Marine Team)
Agent ID	
Agent Name	
Position	
Company / Organisation	
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.	3.126
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

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

<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>Biodiversity Networks and Net Gain (3.126)</p> <p>We advise amendments are made to the supporting text as follows:’</p> <p>Developers and land owners will need on site ecological assessments combined with a completed Defra Biodiversity Metric in order to identify how measurable net gains will be provided on site alongside development. The Council will prepare and contribute to the Liverpool City Regions Local Nature Recovery Strategy (LNRS) and Nature Recovery Networks with partners. The core purpose of LNRS is to help reverse the ongoing decline of biodiversity and nature. LNRS aims to help restore and link up habitats so that species can thrive; the process ensures local partners collaborate to agree the best places to help local nature recovery. The strategies are designed as a tool to drive more coordinated, practical and focused action to deliver a</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>bigger, better and more joined up Nature Recovery Network across the whole of England, delivered at County / Combined Authority level in most areas. LNRS became mandatory in April 2022 and the aim is to have LNRS ready for 2023 to inform roll out of Biodiversity Net Gain. Regulations and Guidance for LNRS are due out later this year so it is not yet clear if and how LNRS will be addressed by Local Plans .In the interim, prior to the requirements of the Environment Act being in place, net gains in biodiversity will still be sought under the NPPF, and Policy WS 5 identifies priority areas for improvement.'</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	

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

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

LPSP-1263

Comment ID	LPSP-1263
Person ID	1248567
Include files	LPSP-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	Part 3
Title	Strategic Policies
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	3.10
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

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

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

LPSP-1264

Comment ID	LPSP-1264
Person ID	1248567
Include files	LPSP-1264-EM-Hrycan Attach 1 of 2 2107_Redacted.pdf
Consultee Name	Emily Hrycan
Position	
Company / Organisation	Historic England
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WD 2
Title	Heritage Assets
To which part of the Local Plan does this representation relate?	Sustainability Appraisal
<ul style="list-style-type: none"> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment 	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

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	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	

<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>In view of our comments on the local plan, we disagree with the content and approach of the Sustainability Appraisal (SA) with regards to the sustainability topic on Heritage. Local Authorities are required to follow the legislation and guidance regarding Sustainability Appraisals such as the Environmental Assessment of Plans and Programmes Regulations 2004 and the Planning Practice Guidance which has its own sections on SEAs and SAs. We are concerned that the SA does not provide an appropriate level of detail as required by the Regulations. This is because it does not demonstrate that the each of the policies and proposals have been fully assessed which is necessary in order to Page 2 of 3 determine their likely significant effects on heritage. Whilst there are obvious exclusions from the need to do the assessment, there would be an expectation for this to be clearly explained and supported by robust evidence. In the absence of an explanation of why the Local Authority have not assessed each of the policies and proposals, together with the lack of detail, it does not give confidence that the conclusions reached can be relied on in relation to heritage. We consider at this point that the local plan would not meet the legal tests given the lack of a suitable SA. Historic England would welcome the opportunity to work with you to resolve the matters raised prior to examination.</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>as above</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>
--	------------

Comment ID	LPSD-1265
Person ID	1277274
Include files	LPSD-1262, 1265, 1268-1270 and 1390-EM-Leigh Attach 2507_Redacted.pdf
Consultee Name	Ms Angela Leigh
Position	Planning & Development Lead Adviser
Company / Organisation	Natural England (Coast and Marine Team)
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.	Please refer to attachment Policy WS 5.5 Mitigating recreational disturbance on International Sites for Nature Conservation, Policy We welcome this policy and the inclusion of wording regarding the Information and Guidance Note: Approach to Avoid and Mitigate Recreational Pressure in Wirral which is to be put in place prior to the RMS. Natural England reviewed and gave advice on an early working draft version of the guidance note and would be happy to provide further comments as the guidance note is developed further.
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be	

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

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

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

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

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

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-1267
Person ID	1248438
Include files	LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf
Consultee Name	Country and Coastal Development Ltd
Position	
Company / Organisation	
Agent ID	1248451
Agent Name	Mr Steve Grimster
Position	Director
Company / Organisation	Grimster Planning
Number	Policy WS 1
Title	The Development and Regeneration Strategy for Wirral 2021 - 2037
To which part of the Local Plan does this representation relate?	Policy
<ul style="list-style-type: none"> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment 	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment Our Client welcomes the opportunity to submit this Representation in response to the Submission Document of the Council's emerging new Local Plan. 11.2. Given its strategic location, the Wirral has the potential to realise significant economic growth over the next 16 years provided that positive decisions are made during the preparation of the emerging Local Plan. 11.3. This will require a pro-active approach from the Council in order to meet housing needs across the Wirral, and to ensure a balanced approach to housing delivery which delivers the

as precise as possible.	<p>right houses in the right place at the right time. 11.4. It remains our Client's firm position that this can only be achieved through greenfield land release, including the release of land in the Green Belt in west Wirral. This includes our Client's land interests at Sandy Lane in Irby, the allocation of which (Site Ref. 8) was identified in the Council's earlier Issues and Options consultation document. 11.5. The Council needs to adopt an aspirational approach to housing and economic growth, directing new development to the most sustainable locations in the Wirral and specifically sites which are free of any significant constraints, including sites outside flood zones 2 and 3. 11.6. Based on the SD, our Client has the following objections: Ø The development and spatial strategy to meet the Borough's housing needs would see new development directed predominantly towards east and north-east Wirral, resulting in a significant housing imbalance, with very limited housing growth in west Wirral which will remain subject to widespread Green Belt constraints precluding any housing growth in these locations for the next 16 years; Ø The needs of people living in west Wirral will only be met in east Wirral, requiring the relocation of people to other parts of the Borough. This in turn will increase pressure on the infrastructure and services in east Wirral, whilst causing continued issues of a lack of affordability in west Wirral and a lack of investment to maintain and enhance the vitality and viability of towns and villages; Ø The 2021 SHMA Update shows the largest need being for 3 and 4 bedroom houses (60% of all new housing stock across all tenures), with a lower combined demand for 1 and 2 bedroom properties overall. The Council's spatial strategy and distribution, and sources of supply, will not deliver the type and size of properties to align with and meet this need over the Plan period, nor will it meet the affordable housing needs identified in the SHMA by virtue of directing the majority of new development to lower value brownfield sites in less viable locations within the Wirral; Ø The continued reliance on brownfield sites is reflective of the failures of the past dating back to 2005 at the time of the Council's Interim Housing Policy. This resulted in a significant shortfall in housing delivery across the Wirral, a position from which it is still to recover to this present day. There is no certainty that the housing needs of the Borough can be met from non-Green Belt sites alone; as a minimum, safeguarded land needs to be identified as part of the Local Plan to ensure that Green Belt boundaries can endure beyond the Plan period through to 2037. As it stands, Green Belt boundaries would have to be altered as part of the next Local Plan; safeguarded land now would alleviate that need, whilst also providing a contingency basis for the release of safeguarded land during the Plan period in the event that Wirral sees a continued housing shortfall as it has done so historically; Ø It will result in a very marginal five-year housing land supply upon adoption, based on the Council's own figures with an over-reliance on the delivery of housing from the Regeneration Areas and Broad Locations of Growth which are faced with considerable lead-in times and issues (i.e masterplans, upfront infrastructure works) and, in some cases, where no specific land allocations are proposed; Ø There is a great deal of uncertainty over the supply of sites which form the "other developable areas" within the Regeneration Areas and Broad Locations for Growth, and a lack of information in relation to which sites the Council considers will come forward and when, and how constraints will be adequately addressed whilst ensuring that development would remain viable; Ø There is still a large amount of gap funding for key infrastructure projects which are required to support the level of growth planned in east and north-east Wirral; Ø The housing trajectory illustrates a shortage of housing land in the first three years of the Plan period. This can be avoided through a positive approach to the plan-making process. Accordingly, there are exceptional circumstances to justify Green Belt release having considered the requirements of paragraph 140 of the NPPF; Ø There is a large reliance on allowances to make a contribution to meeting the housing requirement. The contribution from allowances is not infinite, and a more positive approach towards ensuring housing growth and delivery should be adopted; and Ø The level of growth directed towards Settlement Area 7 is minimal over the Plan period. It will not respond to identified housing needs, nor allow for the majority of the priorities for this Settlement Area to be realised in an area with a population of 28,500 people. 11.7. To make the Plan 'sound,' one of the main modifications required is the release and allocation of land in the Green Belt for housing, and a revision to the spatial strategy and distribution; our Client's land interests west of Sandy Lane in Irby should be allocated in the SD for the development of c. 95 no. dwellings, as previously identified in the I&O consultation document. 11.8. For the reasons set out above, it is our Client's position that the Council's proposed development and spatial strategy will not result in the emerging Local Plan being found 'sound' as it is not positively prepared, justified, effective and consistent with national planning policy. Accordingly, they object to the SD as drafted for the reasons set out in this Representation. 11.9. Our Client looks forward to continuing to engage in the ongoing preparation of the emerging Local Plan as it progress towards Examination. 11.10. Should you have any queries on any of the information contained within this Representation, or require any further information on our Client's land interests at Sandy Lane in Irby, then we would be happy to assist.</p>
omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	

<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.</p>	<p>Green Belt Land release required - omission site Sandy Lane in Irby</p>

<p>It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	
<p>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-1268

Comment ID	LPSD-1268
Person ID	1277274
Include files	LPSD-1262, 1265, 1268-1270 and 1390-EM-Leigh Attach 2507_Redacted.pdf
Consultee Name	Ms Angela Leigh
Position	Planning & Development Lead Adviser
Company / Organisation	Natural England (Coast and Marine Team)
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Appendix 15
Title	Monitoring Framework
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.	10.58
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

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

<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</p>	<p>We advise the text here is updated to make reference to biodiversity net gains both on site and off site, as below.</p> <p>'The Defra Biodiversity Metric will be used to identify the net gains that will be provided both on site and off site with development. Local Nature Recovery Strategies and Nature Recovery Networks will identify the recipient sites for off site Biodiversity Net Gain provision where on site provision is not possible. Refer Policies WS 5 and WD 3.</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-1269
Person ID	1277274
Include files	LPSD-1262, 1265, 1268-1270 and 1390-EM-Leigh Attach 2507_Redacted.pdf
Consultee Name	Ms Angela Leigh
Position	Planning & Development Lead Adviser
Company / Organisation	Natural England (Coast and Marine Team)
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	Habitat Regulations Assessment
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
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 overall satisfied with HRA few comments

<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>3.42 & 3.43 Visual and Noise Disturbance from Construction Works There is reference in the text here to Portsmouth/Portsmouth SPAs, we advise this is updated to reflect the appropriate designated sites and area. 4.29 Water quality It is not clear how impacts have been ruled out on the Sefton Coast SAC with the site overlapping in area with the Ribble & Alt Estuaries SPA/Ramsar which has been carried forward in the assessment, we advise further justification is added here.</p> <p>Table 7 Housing and employment sites allocated in the emerging Wirral Local Plan . We note that all brownfield sites have been screened out within Table 7, however it should be noted that all Wirral Waters developments have the potential to impact on functionally linked habitat, and this has been noted elsewhere within the HRA we therefore advise the assessment needs to consider both brownfield and greenfield sites.</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>	
--	--

LPSD-1270

Comment ID	LPSD-1270
Person ID	1277274
Include files	LPSD-1262, 1265, 1268-1270 and 1390-EM-Leigh Attach 2507_Redacted.pdf
Consultee Name	Ms Angela Leigh
Position	Planning & Development Lead Adviser
Company / Organisation	Natural England (Coast and Marine Team)
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	Sustainability Appraisal
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.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	

<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	<p>Please refer to attachment SA generally satisfied, incorrect referencing see below</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>incorrect referencing of designated sites within 8.3.1 (River Mersey SSSI) and we advise this is updated.</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**

LPSD-1271

Comment ID	LPSD-1271
Person ID	1248438
Include files	LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf
Consultee Name	Country and Coastal Development Ltd
Position	
Company / Organisation	
Agent ID	1248451
Agent Name	Mr Steve Grimster
Position	Director
Company / Organisation	Grimster Planning
Number	
Title	Vision
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.	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	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment 2.2. Our Client supports the aspiration for Wirral to offer its residents a high-quality of life, providing the opportunity to live and work in the Borough. This will require new investment in homes, employment, retail and leisure facilities across the whole of Wirral to ensure a well-balanced approach to delivery and growth. Investment in sustainable travel also has a key role to play in delivering and securing environmental improvements. 2.3. As drafted, our Client is concerned that the Local Plan Vision is overly focused on the regeneration and growth of

<p>as precise as possible.</p>	<p>Birkenhead, Wirral Waters, New Ferry and Liscard (in east and north-east Wirral). Indeed, between them these are referenced in 8 of the 13 parts to the Local Plan Vision. 2.4. In contrast, passing reference is made to the other commuter towns and villages in the Wirral, in part H. The vision for the “commuter towns and villages of the west of Wirral” up to 2037 is to experience “small scale incremental development” in a landscape “protected by Green Belt designation.” In effect, this is the same development and strategic approach to growth which the towns and villages in the west of Wirral have experienced since and before the adoption of the Wirral Unitary Development Plan in 2000. This vision does not provide for a balanced distribution of new housing and employment growth across the Wirral to meet local needs, with the Local Plan heavily weighted towards development in the east and north-east of Wirral. Indeed, Part L even suggests that Birkenhead will be the focus to meet the housing needs of the Wirral, rather than adopting a balanced spatial distribution. Moreover, it is unclear why the Council is of the view that a large majority of people would wish to reside in Birkenhead, as opposed to the many other sustainable built-up areas and towns/villages across the Wirral. No doubt some people will have a preference to do so; however, such a strategy does not account for and meet all housing needs and aspirations. 2.5. It appears to be the Council's strategy that the commuter town and villages in the west of Wirral will support limited growth for the next 15 years, and that the housing needs of those villages will be met in the east of north-east of Wirral, rather than locally where the need exists. There will be little to no investment to the west of the M53 motorway, covering a number of key towns and villages in the Wirral. As outlined above, this very approach has already been adopted by the Council, and has failed, for the reasons that we come on to later in this Representation. It cannot be pursued again if the Borough wants to achieve the social, economic and environmental dimensions of sustainable development set out in the NPPF, nor indeed Part A of the Local Plan Vision itself. It is disappointing that the Council has continued to pursue this approach, despite the concerns and objections that were raised by our Client in response to the earlier I&O consultation document. It appears that the Council is determined to pursue this approach again at all costs, regardless of concern and objection based on a demonstrable historic failure. Our Client does not object to the redevelopment of brownfield land in the Borough; this aligns with Government policy. But that alone is not a sound strategy by which to deliver growth up to 2037, as previous failures demonstrate. Viability will continue to remain a constraint, particularly at a time of rising costs making such schemes more and more marginal. Adopting a brownfield only approach simply does not offer sufficient flexibility to respond to changing market conditions in times of economic uncertainty. 2.6. Instead, there remains a clear need to pursue a balanced development and spatial strategy across the whole of Wirral up to 2037, including the sustainable release of greenfield land in the Green Belt to meet local housing needs (C2 and C3). 2.7. Accordingly, whilst our Client supports some elements of the Local Plan Vision, they object to the fact that, based on the Council's strategic approach, almost half of the Borough will play little to no role in facilitating and benefiting from economic investment in the Borough. This does not constitute a sustainable development and spatial strategy for growth.</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	<p>Yes</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>pursue a balanced development and spatial strategy across the whole of Wirral- including release of green belt land</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to</p>	<p>Yes, I wish to participate in hearing session(s)</p>

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

LPSPD-1272

Comment ID	LPSPD-1272
Person ID	1248438
Include files	LPSPD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf LPSPD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf
Consultee Name	Country and Coastal Development Ltd
Position	
Company / Organisation	
Agent ID	1248451
Agent Name	Mr Steve Grimster
Position	Director
Company / Organisation	Grimster Planning
Number	
Title	The Strategic Objectives of the Local Plan
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	2.39
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment The SD contains 12 Strategic Objectives, consistent with the earlier I&O consultation document. 2.9. As before, our Client is generally supportive of the Strategic Objectives, which are broadly consistent with the themes set out in the NPPF with a view to capturing the economic, social and environmental objectives of sustainable development. This includes sustainable methods of construction, the development of previously developed land, sustainable travel, protection and enhancement of the natural and historic environment wherever possible,

as precise as possible.	adaptation to climate change, flood-risk mitigation, high-quality design, infrastructure investment, meeting housing needs, and economic investment. 2.10. Strategic Objective 1 refers to supporting sustainable development in sustainable locations. For the reasons set out above, the Local Plan Vision does not set out to deliver this, with the west of Wirral (which comprises a number of sustainable towns and villages) identified as accommodating little to no growth. That is not a sustainable spatial strategy. 2.11. Strategic Objective 7 focuses specifically on housing delivery and the need to provide sufficient housing to meet identified local housing needs and providing a choice of housing for people at all stages of life and incomes. However, the spatial strategy that the Council is pursuing will not enable this to be realised, with housing needs failing to be met locally – instead, they will only be provided for in east and north-east Wirral. There is a need to deliver a mix of market and affordable housing across the Wirral over the emerging Local Plan period, with a balanced approach to housing delivery as outlined previously. 2.12. The housing needs of people in west Wirral should not need to be met in east Wirral and vice versa. Whilst development in the west of Wirral will inevitably require the release of Green Belt land, the emerging Local Plan is the platform through which to undertake these policy changes. By trying to avoid making difficult decisions, namely the release of Green Belt land, it is our Client's position that the Council's preferred approach will fail to deliver the sufficient housing which is needed to meet identified local needs and will fail to provide a choice of housing for people at all stages of life and incomes. 2.13. Accordingly, whilst our Client supports the principle of what Strategic Objective 7 seeks to achieve, this will only be achieved through a change to the Council's spatial strategy and a much more balanced approach to housing and economic growth across the whole of Wirral.
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	

<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>spatial strategy should fulfil SO 7 with a more balanced approach to housing and economic growth across the whole of Wirral.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? * No, I do not wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>

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

LPSPD-1273

Comment ID	LPSPD-1273
Person ID	1248438
Include files	LPSPD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf LPSPD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf
Consultee Name	Country and Coastal Development Ltd
Position	
Company / Organisation	
Agent ID	1248451
Agent Name	Mr Steve Grimster
Position	Director
Company / Organisation	Grimster Planning
Number	Policy WS 1
Title	The Development and Regeneration Strategy for Wirral 2021 - 2037
To which part of the Local Plan does this representation relate?	Policy
<ul style="list-style-type: none"> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment 	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Pleaser refer to attachment It is noted that Table 3.1 of the SD identifies eight settlement areas across the Wirral (SA1 to SA8). SA1 to SA4 comprise those areas in the east of the Wirral, with SA5 to SA8 largely covering the west of the Wirral. Figure 3.3 of the SD shows the extent of these settlement areas; in doing so, it is clear that there is significant existing development in the west of Wirral, and each settlement area is effectively capable of accommodating further growth. There is no reason for these areas to stagnate, and to not support any new housing and economic

as precise as possible.	<p>growth. Existing policy designations are not a reason to inform an unbalanced spatial distribution of growth; instead, the plan-making process provides the appropriate mechanism by which to realise growth through a policy change. Not least, this includes the release of some parcels of land from the extensive area of Green Belt to accommodate new development, as illustrated on the Key Diagram provided on page 51 of the SD. 3.3. Paragraph 3.13 of the SD also refers to the need for masterplans to ensure a comprehensive and co-ordinated approach to the delivery of key sites. Indeed, Policy WS6.3 identifies the need for masterplans in 19 areas. This is far from a quick process, requiring significant technical work and consultation which will take time and expenditure. Our Client is therefore concerned that the Local Plan will continue to fail to meet the outstanding housing needs of the Wirral early in the Plan period. 3.4. Based on the spatial strategy that the Council is seeking to pursue through the SD, our Client has the following concerns: Ø It will lead to a significant imbalance in housing delivery between east and west Wirral, with the Council adopting what is effectively an already tested and flawed approach to housing delivery; Ø The urban conurbation will need to meet the housing needs of west Wirral, given that no Green Belt release is proposed around the urban settlements as part of the Council's preferred approach (i.e. Settlement Areas 5 to 8, as well as the separately defined Large and Small Villages). Accordingly, any persons/families in housing need in west Wirral will need to relocate to east Wirral to access a new home. This is applicable to people seeking an affordable home/first time buyers, families, and older persons seeking specialist housing accommodation. Needs will not be met locally within and around those Settlement Areas; Ø A limited housing choice for existing and new residents, with a focus on high-density development in the form of apartments. This will limit the opportunities for new family housing and specialist accommodation for older people, for which there is an identified need in Table 6.4 of the Council's 2021 SHMA Update, with the highest demand being for 3- bedroom market homes, and 2-bedroom affordable homes, with an overall 20% demand for 4 or more bedrooms across all tenures; Ø No contingency in the event of housing under-delivery in the urban conurbation, with Green Belt constraints remaining in place around the towns and villages in west Wirral. No safeguarded land is even proposed as a contingency measure for the proposed Plan period or beyond. The Council is effectively adopting the same failed position and approach as per that since 2005; and Ø Potential out-migration of people looking to move into a new family home to the neighbouring authority area of Cheshire West and Chester where such housing provision is being built, including on former Green Belt sites which were released and allocated as part of the Council's 2015 Local Plan to meet its housing needs. 5. It should be noted that our Client is not against the re-use of previously developed land. That is, after all, consistent with Section 11 of the NPPF. However, it is crucial that the new Local Plan provides a balance between brownfield and greenfield land release and new development. As drafted, the Council's development strategy is fundamentally reliant on the redevelopment and regeneration of brownfield sites, an approach which simply isn't considered to be sustainable based on historic trends and evidence in the Wirral. Adopting another 'urban conurbation' approach to growth over the next 16 years is evidence that the Council has failed to learn from its past mistakes and is once again adopting an 'all eggs in one basket' strategy. Our Client considers this to be a totally flawed approach and one which they object to. 3.6. As such, the role and growth function/capacity of Settlement Areas 5 to 8 should be recognised and much more appropriate and higher levels of growth apportioned to these areas during the Plan period.</p>
complies 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	

<p>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>role and growth function/ capacity of Settlement Areas 5 to 8 should be recognised and much more appropriate and higher levels of growth apportioned to these areas during the plan period.</p>

<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>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-1274

Comment ID	LPSD-1274
Person ID	1248438
Include files	LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf
Consultee Name	Country and Coastal Development Ltd
Position	
Company / Organisation	
Agent ID	1248451
Agent Name	Mr Steve Grimster
Position	Director
Company / Organisation	Grimster Planning
Number	Policy WS 1.1
Title	Homes
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1.1
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment The Local Plan is planning to deliver 13,360 dwellings over the Plan period up to 2037, at an annual rate of 835 dwellings per year. This figure is reflective of the requirement identified in the 2021 Strategic Housing Market Assessment (779 dwellings per annum), plus 6 dwellings per annum to support economic growth, and an allowance of 50 dwellings per year for demolitions. It is an increase over the 12,000 dwellings (800 dwellings per annum) set out in the I&O consultation document. 3.8. Moving forward, as a minimum, it is our Client's position

as precise as possible.

that the base figure should be adjusted to 785 dwellings per annum (up from 779 dwellings per annum), reflective of the updated Standard Method figure of April 2022 using the latest affordability data published by the Office for National Statistics. This along results in extra 96 dwellings over the Plan period, based on the Council's current calculations. 3.9. The proposed housing figure is an increase over that contained in the adopted Wirral Unitary Development Plan (10,500 dwellings) for 1986 to 2001 and the former Regional Spatial Strategy for the North West (9,000 for 2003 to 2021). The RSS was revoked by Central Government in May 2013. In the period April 2003 – March 2013 prior to the revocation of the RSS, there had been 2,740 net completions in the Wirral based on Figure 1 on the following page, an annual delivery rate of 274 dwellings (226 dwellings per year below the requirement). 3.10. Owing to the historic shortfall in housing delivery, particularly at the time that the Council introduced its Interim Housing Policy 'New Housing Development' in 2005, there is clearly a need to make up for this shortfall, as well as to meet future needs. The housing figure therefore needs to be suitably aspirational in order to do so. 3.11. As illustrated on Figure 1 below, during the time that the Interim Housing Policy was in place, net housing completions in the Wirral between April 2005 and March 2013 stood at 1,942 dwellings; this equated to a lowly delivery rate of just 277 dwellings per year, consistent with the aforementioned low annual delivery rates achieved against the housing requirement of the RSS during the same period. Indeed, in the year 2010/11 only 97 net completions took place across the Borough. In 2011/12, there were just 22 net completions. 3.12. Accordingly, the Interim Housing Policy had a significant and damaging impact on net housing completion rates in Wirral and led to an imbalance in housing delivery across the Borough between 2005 and 2013, with limited new housing delivered in west Wirral. Since the end of the UDP period, there has been a consistent under-supply of housing delivery across the Borough against the former RSS requirement. 3.13. There is evidently a demonstrable need to ensure that the emerging Local Plan does not follow the same, failed path of the Interim Housing Policy by focusing all new housing development to the east and north-east Wirral on previously developed land. Lessons from previous failings must be learnt. 3.14. Instead, and as set out previously, the new Local Plan must ensure that a balanced approach to future housing delivery across the Borough is adopted and in doing so enable the Council to demonstrate a minimum five-year housing land supply from the very start of the emerging Local Plan period. When considering the housing requirement for the Wirral, it is necessary to have regard to paragraph 60 of the NPPF, which sets out the Government's objective of "significantly boosting the supply of homes." Paragraph 60 sets out that this will "require a sufficient amount and variety of land to come forward where it is needed that the needs of groups with specific housing requirements are addressed and that land with permission is developed with unnecessary delay." 3.16. Paragraph 61 of the NPPF goes on to state that the minimum number of homes needed should be informed by a local housing need assessment conducted using the "standard method in national planning guidance." The standard method is only to be viewed as a minimum starting point consistent with Paragraph: 010 Reference ID: 2a-010-20201216 of the Planning Practice Guidance. The same paragraph recognises that an increase to the housing minimum figure identified through the standard method is appropriate, including but not limited to the following: Ø Growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (i.e. Housing Deals); Ø Strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; and Ø An Authority agreeing to take on unmet need from neighbouring authorities, as set out in a Statement of Common Ground. 3.17. The Planning Practice Guidance also acknowledges that there may, occasionally, be situations where previous levels of housing delivery in an area, or previous assessments of need (such as recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome of the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests. 3.18. Based on footnote 36 of the SD, it appears that an adjustment of 6 dwellings per annum has been made to support economic growth up to 2037, having regard to the evidence prepared by Edge Analytics. It is essential that the new Local Plan delivers sufficient new housing to support the economic growth of the Borough – whilst the 2020 Employment Land Needs Assessment indicates that employment is not expected to grow significantly in Wirral over the period up to 2040, the Local Plan should nevertheless be positively prepared and aspirational. In respect of the latter, the Wirral Growth Plan: A 2020 Vision seeks to attract and guide and attract new investment into the Wirral to give it a competitive advantage, and to feed into the work of the Liverpool City Region Combined Authority; the Plan will support the delivery of infrastructure and housing to enable growth to take place. A Local Plan which positively provides for the delivery of enough new homes in the right place on the right sites at the right time will support the aims of the Growth plan; this includes a mix of homes and tenures to meet the different needs of people in society (and those who might be attracted to move to live and work in the Wirral), and a balanced housing delivery across east and west Wirral (which has not been the case since the end of the UDP period in 2001). 3.19. Whilst it is noted that paragraph 5.31 of the Wirral Strategic Housing Market Assessment ("SHMA") Update published in January 2020 does not consider that an uplift to the housing requirement should be advanced having regard to past delivery levels (a trend continued in the October 2021 Update), it should be noted that delivery levels in the Wirral since 2005 have been significantly impacted by the Council's Interim Housing Policy, the economic recession of 2008, and the lack of available land on which to deliver owing to the tight Green Belt constraints across the Borough and the continued absence of an up-to-date Local Plan. The net housing completions during the UDP period 1986 to 2001 demonstrate that housing delivery is capable of being much higher than the net average of 544 dwellings per year over the last five years, and there is developer appetite to build new homes in the Borough. This is supported by the delivery rates for the period 2015/16 to 2019/20, which have averaged 588 dwellings per annum based on Table 2.10 of the SHMA Update 2021; furthermore, over 700 dwellings per annum were delivered in reporting years 2017/18 and 2019/20 across the Wirral. 3.20. Accordingly, the Council should have regard to these mitigating factors and historic delivery rates to ensure that the housing requirement is capable of meeting the economic needs and growth potential of the Borough up to 2037

implies 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	base housing figure should be 785 dpa reflective of updated Standard Method figure of April 2022 using latest affordability data.

<p>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</p>	

**Plan for examination,
publication of the
Inspector's
recommendations
and adoption of the
Plan).**

*** Yes**

*** No**

LPSPD-1275

Comment ID	LPSPD-1275
Person ID	1248438
Include files	LPSPD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf LPSPD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf
Consultee Name	Country and Coastal Development Ltd
Position	
Company / Organisation	
Agent ID	1248451
Agent Name	Mr Steve Grimster
Position	Director
Company / Organisation	Grimster Planning
Number	Policy WS 1.2
Title	Employment
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1.2
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment 3.22. Our Client does not choose to comment on the economic development strategy for the Wirral. It will be for the Council to justify the level of economic growth that is planned. 3.23. Notwithstanding this, on review of the spatial approach set out within this Policy, it is noted that no employment growth is planned in Settlement Areas SA6, SA7 or SA8 during the Plan period up to 2037. Indeed, only 4.74 hectares of employment land is identified in any part of a Settlement Area comprising land in the west of Wirral (i.e west of the M53 motorway). 3.24.

as precise as possible.	Consequently, not are the majority of new homes directed to the east and north-west of the Wirral, but so too are the new jobs that are to be created. As such, they are not proposed to be sited locationally close to existing towns and villages in the west of Wirral. Those residents living in these parts of Wirral will therefore be required to travel to their place of work elsewhere in the Borough, or indeed outside of the Borough. This does not seem to reflect the sustainable strategy for growth which the Local Plan Vision is seeking to achieve.
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	more jobs should be located next to villages and towns in the West of Wirral

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

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

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

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

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

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

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

Comment ID	LPSD-1276
Person ID	1323731
Include files	LPSD-514-533, 1276-EM-Barton-Attach 12 of 12 2207_Redacted.pdf
Consultee Name	Mrs Brigid Edwards
Position	
Company / Organisation	Taylor Wimpey
Agent ID	1323730
Agent Name	Mr Richard Barton
Position	
Company / Organisation	Avison Young
Number	Policy WS 10.4
Title	Facilities for Education, Health and Emergency Services
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 10.4
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please see submitted representations prepared by Avison Young on behalf of Taylor Wimpey UK Limited for comments on the soundness of the Local Plan and specific comments on the draft policy. Refer to Consortium response and attachment (Land at Lever Causeway).

as precise as possible.	<p>With regards to viability, Technical Paper 5: A Critique of the Viability Evidence (prepared by Roger Hannah) (enclosed at Appendix V) addresses contributions towards education and health. The representation states that the range of S106 assumptions made by the Council excludes any contribution towards health and education and the Council wishes to concentrate the vast majority of new development in Birkenhead where there will be a need for significant investment in local infrastructure, transport, schools, healthcare and public realm which are currently not included in any S106 contributions in the appraisals undertaken. As such, it is believed that the expected S106 contributions are being understated, resulting in an overestimation of Local Plan viability. This being the case, where an individual application is subsequently found to require significant additional contributions beyond those tested there will remain a need to complete site-specific viability appraisals to fully assess the impact of any additional obligations.</p> <p>Draft Policy WS 10.3 is not considered to be sound as it is not positively prepared, justified, effective or consistent with national policy for the reasons set out above and expanded in the Consortium Representations.</p> <p>The flaws of draft Policy WS 10.1 relate to the inconsistencies and miscalculations between the Infrastructure Delivery Plan and the CIL and Viability Assessment which is a fundamental issue with the whole Local Plan viability and therefore it will not be possible to rectify these soundness issues through the main modifications process.</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.	N/A
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the	N/A

<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>Please see submitted representations prepared by Avison Young on behalf of Taylor Wimpey UK Limited for comments on the soundness of the Local Plan and specific comments on the draft policy.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? * No, I do not wish to participate in 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>It is necessary for Avison Young to attend and participate in the examination, on behalf of Taylor Wimpey UK Limited, in order to discuss the technical evidence and strategy in relation to housing requirement and delivery and the need for Green Belt release.</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-1277

Comment ID	LPSD-1277
Person ID	1248438
Include files	LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf
Consultee Name	Country and Coastal Development Ltd
Position	
Company / Organisation	
Agent ID	1248451
Agent Name	Mr Steve Grimster
Position	Director
Company / Organisation	Grimster Planning
Number	Policy WS 1.4
Title	Flooding and Drainage
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1.4
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment This Policy states that development will avoid areas at risk of flooding from all sources unless there is suitable mitigation or flood protection in place or provided as part of development, and flood risk is not increased elsewhere. 3.26. On review of the Environment Agency flood maps, it is clear that large swathes of east Wirral lie within Flood Zones 2 and 3. This is shown below on the interactive maps in Appendix 1 of the Strategic Flood Risk Assessment. 3.27. Looking at the Council's proposed allocations as shown on the Key Diagram, some of these

as precise as possible.	sites currently lie in Flood Zones 2 and 3. This is confirmed in the Sequential and Exception Test Report published by the Council in March 2022. As such, the Council itself does not appear to be applying its own guidance when it comes to avoiding development in areas at highest risk of flooding, when land at lower risk of flooding is evidently available for development in other parts of the Wirral, subject to a policy change (i.e release from the Green Belt). It appears that the approach adopted by the Council is one whereby development in Flood Zones 2 and 3 is considered to be more acceptable than the Local Plan facilitating Green Belt release at the edges of sustainable towns and villages in Flood Zone 1 (and which at the same time would also provide for a more balanced distribution of housing across the Wirral and deliver more affordable housing). Such an approach is not considered to be justified
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.	

<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>	

LPSP-1278

Comment ID	LPSP-1278
Person ID	1324130
Include files	LPSP-1278, 1287, 1290, 1296, 1299 and 1410-EM-Henderson Attach 2507_Redacted.pdf
Consultee Name	Blueoak Estates Ltd
Position	
Company / Organisation	Blueoak Estates Ltd
Agent ID	1324129
Agent Name	Ms Alice Henderson
Position	Senior Planner
Company / Organisation	Asteer Planning
Number	Policy WS 1.1
Title	Homes
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1.1
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>Policy WS1.1 of the Submission Plan identifies an overall housing need of 13,360 dwellings over the 16 year Plan Period (2021-2037), equating to 835 dwellings per annum (this includes 785 dwellings per annum ["dpa"] plus 50 dpa to address demolition and replacement). In response to this, the Local Plan makes provision for 18,000 dwellings during the Plan Period.</p> <p>This figure represents the Governments Standard Methodology figure for the Borough's housing need and should represent a "minimum" starting point only. It represents around half of the level of housing that the Wirral would need to provide to support the Government's 300,000 dpa national housing target by the mid-2020s. The significant investment and growth potential of the Borough represents a generational opportunity to support economic growth and should represent a departure from trend based demographic growth that the local housing need represents. Furthermore, the housing figure fails to align with employment land needs or adequately consider affordability</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>Blueoak consider that the Council should plan for a higher housing need figure than the standard method indicates, as supported by the NPPF.</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**

LPSPD-1279

Comment ID	LPSPD-1279
Person ID	1248438
Include files	LPSPD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf LPSPD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf
Consultee Name	Country and Coastal Development Ltd
Position	
Company / Organisation	
Agent ID	1248451
Agent Name	Mr Steve Grimster
Position	Director
Company / Organisation	Grimster Planning
Number	Policy WS 2
Title	Social Value
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 2
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment. Our Client supports the aspiration to ensure that new development supports the local economy, including the local construction industry and supply chain. The same applies to utilising and developing the local skills base, including apprenticeships/agreements with local education. 3.29. Notwithstanding this, the Policy must ensure that a sufficient level of flexibility and choice remains for developers, particularly at time of increasing material and contractor costs; competitiveness in the sector will be important given the impact of rising/fluctuating costs

as precise as possible.	over a 15+ year period on the viability of development. This is even more of an issue given the Council's proposed development and spatial strategy which relies heavily on the redevelopment of brownfield parcels of land which already attract remediation and infrastructure costs, let alone those related to the development itself (including S106 obligations). The lack of flexibility and insistence on using local labour and supply chains could have a significant impact on deliverability and remove the competitiveness that is required in the marketplace to safeguard the viability of development
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	introduce flexibility to the policy

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

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

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

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

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

If you wish to participate in the

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

LPSPD-1280

Comment ID	LPSPD-1280
Person ID	1248438
Include files	LPSPD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf LPSPD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf
Consultee Name	Country and Coastal Development Ltd
Position	
Company / Organisation	
Agent ID	1248451
Agent Name	Mr Steve Grimster
Position	Director
Company / Organisation	Grimster Planning
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	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to Attachment Our Client accepts the importance of building new homes which meet current needs, but which can be equally adaptable to respond to future needs/changing needs. The development of homes which meet the minimum Nationally Described Space Standards is supported. 4.3. The move towards achieving net zero carbon in Wirral by 2041 is a positive step, provided that it does not impact on the viability of housing schemes coming forward. There has to be a balance between future-proofing and delivery. However, all new homes should be capable

as precise as possible.	of providing electric vehicle charging infrastructure and utilising sustainable methods of construction. 4.4. Policy WS3.1 is detailed in respect of its standards. On reading the policy, it appears that this is applicable to all new build dwellings; so, in effect, anything of 1 or more dwellings (save for Part 4, (i)). There is no flexibility within the policy; all 4 parts of the Policy must be satisfied. Whilst this might be achievable on larger developments, it might well impact on the viability of smaller schemes, and indeed sites with extensive abnormal costs, in particular brownfield sites with remediation/infrastructure issues. The Council needs to be satisfied that its housing land supply can meet these policy requirements, as there is no scope in the Policy not to do so. Indeed, the Council must be able to demonstrate that all policy requirements within the SD can be met by every proposed allocation/housing land which forms its supply.
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.	

<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>Introduce flexibility to the 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-1281

Comment ID	LPSD-1281
Person ID	1248438
Include files	LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf
Consultee Name	Country and Coastal Development Ltd
Position	
Company / Organisation	
Agent ID	1248451
Agent Name	Mr Steve Grimster
Position	Director
Company / Organisation	Grimster Planning
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	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment On review of this Policy, it is very clear that the Council is relying heavily on high-density developments by which to secure its housing requirement. The Policy identifies four density zones, ranging from 40 to 70 dwellings per hectare. This will involve the development of a larger number of high-density, apartment led schemes; it is unclear how this aligns with the housing mix policy (Policy WS3.4) and the identified housing needs in the 2021 SHMA Update (for 40% 3-bedroom homes across all tenures, and 20% 4 or more bedroom homes across all

as precise as possible.	<p>tenures, jointly equating to 60% of all future housing stock). The policy guidance for high-density development, particularly in Birkenhead and its hinterlands/other Regeneration Areas, will typically mean more smaller apartments and fewer family homes (terraced, semi-detached, detached). Concentrating the majority of new development to the urban conurbation will naturally have this effect and in time could lead to market saturation (particularly given the proximity to competing, high-density development across the River Mersey in the City of Liverpool). It subsequently raises the question of whether there is a market demand for such significant levels of high-density development in the Wirral (such as those at Wirral Waters), particularly given its proximity to the City of Liverpool and the availability of competing, high-density development. The 2021 SHMA Update also shows a demand for 3 and 4 bedroom properties across all tenures (60% combined), whereas a large majority of the properties to be developed as part of high-density schemes will be 1 and 2 bedrooms as confirmed in the 2001 Wirral Density Study (in the Waterfront density zone). Our Client also considers the Density Study to make some over-optimistic assumptions that the Urban Core and Town Centre density zone will deliver larger 3-bedroom, 2.5 storey terraces and semi-detached properties at a density of 60 dwellings per hectare. Whilst this should not be prevented, it is considered unlikely – instead, sites within this zone they are much more likely to accommodate apartment-led schemes. Consequently, the Council will be relying on such housing coming forward in the Transit and Suburban density zones; the Density Study suggests as much. However, the advice that development in these density zones should provide for a reduction in car parking (where residents of at least 3-bedroom, 2.5 storey houses are very likely to have access to at least 2 vehicles) is a concern and will need public transport services and pedestrian/cycle links to be improved, for which there is an identified funding gap in the Infrastructure Delivery Plan. 4.6. Moreover, it will be necessary for such schemes to considered wider policy requirements; for example, residential amenity (from overlooking, overbearing), shadowing/loss of light, landscape/visual impacts, impact on heritage/conservation assets, and impact on the waterfront setting. Indeed, the Density Study refers to development of 3 to 5 storeys in the Waterfront density zone, and 2.5 storey development in all other density zones; this may not be achievable in all locations taking account of the above policy considerations/constraints. 4.7. The development of high-density schemes and taller buildings will inevitably impact on the landscape (local and in some cases historic), which might not be appropriate in all locations. The concentration of high-density residential schemes within a particular area/neighbourhood will add to the existing pressures on social and physical infrastructure, including education and healthcare settings, roads and public transport, open space and recreation. 4.8. Elsewhere in the Wirral, Part C of the Policy requires developments of 1 hectare or more to achieve a density of at least 30 dwellings per hectare. This is considered to be a reasonable approach, and reflective of the guidance contained in paragraph 125 of the NPPF. The NPPF identifies the need to provide for the efficient use of land as part of new developments. This includes the need for planning policies and decisions to avoid homes being built at low densities and ensuring that development proposals make optimal use of the potential of each site (paragraph 125 of the NPPF). 4.9. The National Design Guide provides guidance to inform policy-making and decision-taking. Whilst the National Design Guide recognises the potential for increased densities as part of residential schemes, it also acknowledges the need to create balanced and mixed neighbourhoods that are suitable and accessible for all. It identifies that well-designed places have an integrated mix of housing tenures and types that reflect local housing need and market demand to suit people at all stage of life, including people who require affordable housing, family homes, older persons accommodation, student accommodation and people with physical disabilities or mental health needs. 4.10. As such, whilst our Client does not object to higher density development on brownfield sites, which would be consistent with national planning policy, there is a need to strike a balance across the Wirral. High-density development is not considered to be the primary solution to meeting all of the different housing needs across Wirral; the Council's strategy as presented within the SD is not considered to offer sufficient flexibility to deliver a variety and choice of new homes.</p>
omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance,	

<p>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</p>	

<p>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>	

Comment ID	LPSD-1282
Person ID	1248438
Include files	LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf
Consultee Name	Country and Coastal Development Ltd
Position	
Company / Organisation	
Agent ID	1248451
Agent Name	Mr Steve Grimster
Position	Director
Company / Organisation	Grimster Planning
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	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not 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.	<p>Please refer to Attachment</p> <p>In terms of affordable housing needs across the Wirral, paragraph 3.53 draws on the findings of the Council's 2021 SHMA. This identifies a need for 374 affordable homes in the Wirral. Based on the requirement for 20% of newly built homes per year to be affordable (paragraph 3.55), this would equate to 167 dwellings per year (based on the 835 dwellings per year housing requirement. This is considerably below the 374 affordable homes per year need identified in the SHMA and is a shortcoming in the development strategy. 4.12. Our Client supports the aspiration to deliver different types/tenures of affordable housing, including First Homes. This is reflective of national planning policy guidance. 4.13. It is noted that the Policy splits the affordable housing requirements down into Viability Zones – 1 to 4. Zones 1 and 2 cover the east and northern parts of Wirral, and Zones 3 and 4 in the southeast, western and northern parts of Wirral. 4.14. Based on the Policy, Zones 1 and 2 are only expected to deliver 10% affordable housing on sites comprising 10 or more dwellings. This is no higher than the requirement set out in the 2000 Unitary Development Plan; it is also reflective of the location and nature of the land found in these areas, that predominantly being brownfield sites in urban areas, with many subject to abnormal costs. There is the expectation in the 2001 Density Study that they will deliver high-density apartment schemes, primarily of 1 and 2 bedrooms. These factors naturally impact on scheme viability; paragraph 6.3 of the Housing Delivery Strategy accepts as much. By directing housing growth towards these eastern/north-eastern locations, it is effectively at the expense of delivering much higher levels of affordable housing, some of which could otherwise be achieved in parts of west Wirral where viability is less of an issue. 4.15. As paragraph 4.10 above illustrates, the annual affordable housing needs identified in the SHMA will not be met through the SD; indeed, only 45% of the annual affordable housing need is to be met, let alone the historical shortfall. This is considered to be a major shortcoming of the Council's development strategy, owing to its proposed spatial strategy. If a more balanced approach to housing delivery was planned across the Wirral, including the release of greenfield sites, then more affordable housing could naturally be delivered. That is why 20% affordable housing is expected in Zones 3 and 4 on sites comprising 10 or more dwellings, but where there is going to be much less new housing delivered overall compared to Zones 1 and 2. 4.16. In stark contrast to the above, the previous I&O consultation document proposed a 30% affordable housing requirement on all housing sites comprising 10 or more dwellings (where the proposals are predominantly for market housing). This was an increase above the existing 20% policy requirement in Wirral and took account of affordability needs and the fact that in the five-year period (2015/16 – 2019/20), 29.4% of new homes in Wirral were affordable as documented in Table 2.10 of the October 2021 SHMA. In view of the ongoing affordability issues, the new thresholds now set out in Policy WS3.3 will not address the affordable housing needs of the Wirral, and will fall below the trends in housing delivery. The Council is therefore planning to under-deliver on affordable housing, despite there being evidence that a higher proportion of affordable housing is capable of coming forward for development. The affordable housing policy requirements have instead been set at a lower rate (10% and 205) owing to the sources of land supply upon which the Council is relying to meet its housing needs (and the viability constraints attached to them), which appears driven to negate any Green Belt release across the whole of the Wirral. 4.17. By adopting this Policy and the Council's development and spatial strategy, the same level of social benefits will not be realised than would otherwise be the case through a much more balanced housing distribution. The delays likely to be associated with the release of land in the east and north-east of Wirral (including the requirement under paragraph 3.13 of the SD for sites to be comprehensively masterplanned), means that the outstanding affordable housing needs are at very real risk of continuing to go unmet in the short-term. This is completely avoidable by the Council adopting a much more positive approach to its spatial strategy and land release across the whole of the Wirral, and which should be re-visited.</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.	
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	Yes, I wish to participate in hearing session(s)

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

LPSD-1283

Comment ID	LPSD-1283
Person ID	1248438
Include files	LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf
Consultee Name	Country and Coastal Development Ltd
Position	
Company / Organisation	
Agent ID	1248451
Agent Name	Mr Steve Grimster
Position	Director
Company / Organisation	Grimster Planning
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	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	please refer to attachment Part H of this Policy seeks to provide a mix of new homes as part of residential developments which meet the needs of the local community. This is supported by our Client. However, at the same time, they do not see how high-density schemes in the east and north-east of Wirral (in the Regeneration Areas) will be capable of meeting this policy requirement. This will instead deliver a large number of 1 and 2 bedroom apartments (given that Part I of the Policy only allows for 30% of such dwellings to comprise 3 or more bedrooms), making them largely

as precise as possible.	<p>unsuitable for families given the high demand (60%) identified in Table 6.4 of the 2021 SHMA Update for 3 and 4 bedroom properties across all tenures. Furthermore, the type of housing will be apartments; there will be a much more limited number of detached and semi-detached properties being delivered as part of high-density schemes. 4.19. Outside of the Regeneration Areas, at least 70% of market dwellings are expected to be 3 or more bedrooms. Our Client has no objective to this; they would deliver family housing, and also respond to the added number of people now working from home and a large number of whom are seeking at least a 3-bedroom house (to provide working from home office space). Such schemes should also be able to support the delivery of affordable housing provision. Clearly, the predominance of smaller 1 and 2 bedroom apartment accommodation is very unlikely to provide for this flexibility and increasing need however; as such, there is going to be a shortage of new properties comprising 3 or more bedrooms across the Wirral as a whole. Instead, the supply is going to be skewed towards smaller housing at a lower cost, but which will not be of an affordable tenure. 4.20. There is no specific requirement within the Policy for older persons accommodation. It is difficult to see how such provision is going to be delivered based on the Council's spatial strategy; in particular, bungalows in those areas where less housing is directed. So, in Settlement Areas 5 to 8, where less new housing is going to be provided (such as bungalows), there will be less opportunity for downsizing amongst the older population which in turn would otherwise free up family housing. There is no natural housing cycle in the west of Wirral at present, and this will continue; families will struggle to access a property of their own, and older persons will struggle to downsize. If they wish to do so, they are required instead to relocate to live in east and north-east of Wirral, which people are unlikely to do later in life. 4.21. Our Client is therefore concerned that the new Local Plan will fail to deliver the right homes in the right places over the next 16 years to address the housing needs of Wirral's residents and all age groups.</p>
complies 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	

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

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-1284
Person ID	1248438
Include files	LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf
Consultee Name	Country and Coastal Development Ltd
Position	
Company / Organisation	
Agent ID	1248451
Agent Name	Mr Steve Grimster
Position	Director
Company / Organisation	Grimster Planning
Number	Policy WS 1.1
Title	Homes
To which part of the Local Plan does this representation relate?	Policy
<ul style="list-style-type: none"> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment 	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1.1
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment. The Council's Housing Delivery Strategy published in May 2022 contains details of key assumptions that have been applied in calculating the deliverability of sites during the Plan period up to 2037. 5.5. It is noted that Table 4.3 does not offer any differentiation between the different scales of development, and the implications for this on lead-in times. Whilst references is made in the Delivery Strategy to evidence prepared by Lichfields and the Independent Review by Sir Oliver Letwin, it fails to take account of actual experience in the Wirral. For example,

as precise as possible.	<p>it states that the average time for a scheme securing outline planning permission to commencing on site is 37 months; evidently, this is not the case for Wirral Waters which secured outline planning permission in 2012 but where the first phase of residential development only commenced in 2021. Likewise, there are examples of smaller schemes in the Borough remaining undetermined after 15-18 months from submission (which the Council is relying on as urban housing allocations), whereas Table 4.3 suggests that on average this should take no more than 10 months. A recent example includes the development of 6 no. dwellings in Raby (Application Ref. APP/21/00920) submitted in April 2021 and still pending a decision in at the time of writing. 5.6. Our Client accepts that there is a need for a degree of flexibility and judgement on these matters and there is not necessarily a 'one size fits all' approach. However, it is considered that Table 4.3 should be expanded to differentiate between the different sizes of development. For example, this could categorise the different lead-in times for schemes of 0-10 dwellings, 11-50 dwellings, 51-100 dwellings, 101-250 dwellings, 251-500 dwellings and 500+ dwellings to offer a more accurate measure. This is particularly pertinent in the context of the new Local Plan given the different variety of sites (in terms of scale/capacity) upon which the Council is relying as part of its urban housing allocations and other sources of supply. 5.7. As justification for the above, it is noted that the Council itself accepts in paragraph 4.43 of the Housing Delivery Strategy that "slow build-out rates on large sites could be a potential risk to the timely delivery of large-scale housing allocations." This is concerning given the significant reliance that the Council is placing on larger sites within the Regeneration Areas to deliver high-density development; paragraph 4.7 of the Housing Delivery Strategy acknowledges that the constraints such as site remediation will lead to longer lead-in times, whilst paragraph 4.44 refers to market constraints impacting on delivery (which ties in with our earlier concerns regarding the actual demand for the significant number of 1 and 2 bedroom apartments that are proposed). As outlined above, this has already been experienced at Wirral Waters. Together, this further illustrates the need to ensure that the housing supply and spatial distribution is appropriately balanced, particularly in the immediate years of the Plan period after adoption to ensure a deliverable supply of housing land equivalent to at least a five-year supply plus 20% buffer.</p>
omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal	

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

<p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	
<p>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-1285

Comment ID	LPSD-1285
Person ID	1248438
Include files	LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf
Consultee Name	Country and Coastal Development Ltd
Position	
Company / Organisation	
Agent ID	1248451
Agent Name	Mr Steve Grimster
Position	Director
Company / Organisation	Grimster Planning
Number	Policy WS 1.1
Title	Homes
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1.1
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment The Council's spatial approach and supply focuses on urban intensification to meet all of the Borough's needs in the existing urban areas, namely in east and north-east Wirral within the Birkenhead Regeneration Framework Area; indeed, this accounts for 50% of the housing supply for the Plan period. This will involve the development of urban brownfield and non Green-Belt sites, including employment land/premises and pockets of green space, and increased densities across them consistent with the Density Study. It is the Council's position that this negates

as precise as possible.	the need for Green Belt release. 5.11. This approach represents a significant shift from that set out as part of the previous Development Options Review in 2018 at which time the Council openly accepted that Green Belt release would be required in order to meet the Wirral's housing requirements for the next Plan period. It is evident that a concerted effort has been made to try and justify a non-Green Belt release development strategy with a distribution and supply heavily focused on the east and north-east Wirral and brownfield regeneration. This is the same failed strategy that the Council has adopted historically when the Interim Housing Policy was introduced for the period April 2005 to March 2013. New Build Commitments at April 2021 5.13. It is noted that a 10% non-delivery rate has been applied to the figure of 1,730 dwellings. 5.14. For clarification purposes, it would be useful to know the breakdown of this supply in respect of whether the sites have full or outline planning permission, or might be pending an application or determination. Appendix 2 of the 2021 Strategic Housing Land Availability Assessment (SHLAA) does include some site-specific details for sites included in the housing trajectory. Presumably these sites therefore make up some of the commitments and some of the allowances as windfalls. 5.15. There are some sites within Appendix 2 of the 2021 SHLAA which are identified for development within years 1-5, but which have had lapsed/refused planning permissions previously. Examples include Site References 20, 651, 996, 1301, 5032, and 5041. Given the history of sites failing to come forward, it is considered that a minimum 10% slippage is entirely appropriate. It also illustrates that reliance cannot be placed on windfall sites to 'plug' any shortfall in the housing land supply that might arise from the delay in larger housing allocations coming forward during the Plan period. 5.16. Confirmation is also required that the commitments do not include any sites with planning permission within the Regeneration Areas that are accounted for separately (to avoid double counting).
complies 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	

<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>clarify detail on breakdown of housing supply e.g. status of New Build Commitments</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>

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	

LPSPD-1286

Comment ID	LPSPD-1286
Person ID	1248438
Include files	LPSPD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf LPSPD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf
Consultee Name	Country and Coastal Development Ltd
Position	
Company / Organisation	
Agent ID	1248451
Agent Name	Mr Steve Grimster
Position	Director
Company / Organisation	Grimster Planning
Number	Policy RA 6
Title	Wirral Waters Regeneration Area
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	RA 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	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment There is evidently a lot of reliance in Table 1 on the delivery of over 3,000 dwellings at Wirral Waters during the Plan period. It is well-documented that this development has taken time to deliver; outline planning permission was first granted at Wirral Waters in 2012 for the development of 13,520 homes, alongside commercial, retail, hotel and leisure facilities – some ten years ago. Residential development finally commenced in 2021. The time it has taken since planning permission was first granted in 2012 illustrates the complexities associated with

as precise as possible.	bringing forward the Wirral Waters proposals. 5.24. The projected rates of delivery on one site alone (363 dwellings a year between 2022/23 and 2029/30, applying a 10% slippage) have never before been experienced in Wirral. Given the delays at Wirral Waters since 2012, our Client is concerned that this represents a very ambitious and challenging projection. Indeed, such were the concerns and doubts over the deliverability of Wirral Waters, the Council itself previously acknowledged that Wirral Waters would not deliver the scale of development required to negate the need for Green Belt release to meet its housing requirements – this was set out in the Local Plan FAQ published in the Council in September 2018 (where an allowance of 1,100 was made at Wirral Waters). The reliance on Wirral Waters as part of the emerging Local Plan therefore represents a considerable shift in position from the Council. The recent failure of one of its development partners (Urban Splash, who were to deliver 350 homes at Northbank East 1 and Northbank West 2) into administration illustrates the fine margins which exist in relation to the delivery of higher-density development schemes in low value areas on brownfield land.
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.	

<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>adjust rates of delivery</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>

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

Comment ID	LPSD-1287
Person ID	1324130
Include files	LPSD-1278, 1287, 1290, 1296, 1299 and 1410-EM-Henderson Attach 2507_Redacted.pdf
Consultee Name	Blueoak Estates Ltd
Position	
Company / Organisation	Blueoak Estates Ltd
Agent ID	1324129
Agent Name	Ms Alice Henderson
Position	Senior Planner
Company / Organisation	Asteer Planning
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.	

<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>	Not Justified
<p>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</p>	Evidence suggests that the affordable housing target in the Council's 2021 SHMA (calculated by Arc4) is considered to be flawed. The Council's 2021 SHMA identified need of 374 dpa affordable per annum (calculated by Arc4) has fallen significantly from the 705 dpa calculated the year previously, despite there being no discernible improvements to affordability in the Borough. In terms of supply, the Council claims to be consistently delivering over 300 affordable units per year which is contrary to evidence.

<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>As a result of flaws in both the Council's shortfall in delivering affordable homes to date and its proposed approach to meeting affordable housing need in the future, it is critically important that sites which can deliver affordable housing are brought forward, particularly in the context of fundamental viability issues that arise from some brownfield sites that would prevent the delivery of affordable housing.</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**

LPSD-1288

Comment ID	LPSD-1288
Person ID	1248438
Include files	LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf
Consultee Name	Country and Coastal Development Ltd
Position	
Company / Organisation	
Agent ID	1248451
Agent Name	Mr Steve Grimster
Position	Director
Company / Organisation	Grimster Planning
Number	Policy RA 6
Title	Wirral Waters Regeneration Area
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this	RES-RA6.2

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Given the historic failure of housing delivery in east Wirral, it is considered that the level of projected growth at Wirral Waters during the Plan period should be moderated – our Client does not object to its delivery, simply the rate of growth that is forecast; this is particularly true of the Vittoria Studios that are projected to deliver 2,200 apartments, where land remains occupied and detailed planning permission/reserved matters has yet to be secured (albeit noted that reserved matters applications are pending determination for 1,815 apartments at the time of writing)

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	moderate delivery rate of RES RA 6.2

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

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

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

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

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

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

LPSPD-1289

Comment ID	LPSPD-1289
Person ID	1248438
Include files	LPSPD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf LPSPD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf
Consultee Name	Country and Coastal Development Ltd
Position	
Company / Organisation	
Agent ID	1248451
Agent Name	Mr Steve Grimster
Position	Director
Company / Organisation	Grimster Planning
Number	Policy RA 5
Title	Hind Street and St Werburgh's Regeneration Area
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this	RES-RA5.1

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment Our Client has no objection to the development of Hind Street. However, it is clear that there are land assembly issues and infrastructure improvements to be addressed in order to bring this site forward, including the need for essential infrastructure funding as referenced in paragraphs 9.86 and 9.87 of the Housing Delivery Strategy. 5.27. The Housing Delivery Strategy confirms the requirement for a comprehensive masterplan to be prepared, which will no doubt raise issues of equalisation amongst the landowners. It is considered that there is a lot of

as precise as possible.	uncertainty remaining over the delivery of housing in this location, and the timescales for that to come forward. Based on Table 9.6 of the Housing Delivery Strategy, development will need to come forward at a rate of 116 dwellings per annum between 2024/25 and 2036. Whilst not unachievable, it is considered ambitious given the uncertainty and unknowns which remain outstanding. As with Wirral Waters, our Client does not object to the principle of its delivery, simply the rate of growth that is forecast – it is considered that this requires greater moderation.
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	moderate delivery rate of RES-RA 5.1

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

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

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

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

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

If you wish to participate in the

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

LPSD-1290

Comment ID	LPSD-1290
Person ID	1324130
Include files	LPSD-1278, 1287, 1290, 1296, 1299 and 1410-EM-Henderson Attach 2507_Redacted.pdf
Consultee Name	Blueoak Estates Ltd
Position	
Company / Organisation	Blueoak Estates Ltd
Agent ID	1324129
Agent Name	Ms Alice Henderson
Position	Senior Planner
Company / Organisation	Asteer Planning
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	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer to attachment. However, Blueoak object to draft Policy WP 6.3 and the preparation of the West Kirby Concourse Masterplan if it is going to be used to hinder or stifle residential development on brownfield sites within the Masterplan Area. As detailed in Chapter 4 of these representations, there is an immediate and acute need for new open market and affordable homes. In summary, Blueoak's proposed residential development submitted under Application APP/21/01853 is entirely acceptable. Without prejudice to any future appeal that Blueoak may make against the Councils decision to refuse Application APP/21/01853, Blueoak is supportive in principle of a Masterplan for the West Kirby Concourse Area and request that it is consulted as a key stakeholder throughout the preparation of the Masterplan. However, draft Policy WP 6.3 and the preparation of the Masterplan cannot be used to hinder or stifle development.

<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>As detailed in Chapter 4 of these representations, there is an immediate and acute need for new open market and affordable homes. Blueoak's proposed residential development submitted under Application APP/21/01853 is entirely acceptable.</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**

LPSD-1291

Comment ID	LPSD-1291
Person ID	1248438
Include files	LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf
Consultee Name	Country and Coastal Development Ltd
Position	
Company / Organisation	
Agent ID	1248451
Agent Name	Mr Steve Grimster
Position	Director
Company / Organisation	Grimster Planning
Number	Policy RA 5
Title	Hind Street and St Werburgh's Regeneration Area
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	RA 5
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to Attachment 5.28. It is noted that a further 240 dwellings are expected to come forward on other brownfield land within the Regeneration Area. These sites will be identified as part of the St Werburgh's Masterplan area. At the time of writing, there is no certainty as to which land this will comprise, nor any technical/policy constraints which would need to be addressed in order to secure planning permission. As such, it is considered that the 240 units should be removed from the supply unless the Council can provide more detail and certainty over this additional supply.

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	remove 240 dwellings from supply

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

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

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

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

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

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

Comment ID	LPSD-1292
Person ID	1248438
Include files	LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf
Consultee Name	Country and Coastal Development Ltd
Position	
Company / Organisation	
Agent ID	1248451
Agent Name	Mr Steve Grimster
Position	Director
Company / Organisation	Grimster Planning
Number	Policy RA 3
Title	Birkenhead Waterfront Regeneration Area
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	RA 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	No
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment 5.29. The Regulation 18 Local Plan consultation acknowledged the considerable challenges associated with the development of this area. These include land assembly issues, as well as major infrastructure challenges to overcome including the potential realignment of the A41 at Chester Street and Bridge Street and the possible re-positioning of the bus interchange close to the Woodside Ferry Terminal. 5.30. Since the Regulation 18 consultation, the Draft Birkenhead 2040 Framework has been prepared (and the associated Draft Birkenhead

as precise as possible.	Waterfront Neighbourhood Framework). The Birkenhead Waterfront Regeneration Area is forecast to delivery 630 dwellings during the Plan period. 5.31. As part of this, the Rose Brae site is expected to deliver 180 dwellings. This is a shift in position from the Regulation 18 consultation, in which Appendix 4.4 of the I&O consultation document made reference to the fact that this site was not viable owing to poor ground conditions. It also stated that the site has now been deleted from the Wirral Growth Company trajectory. Clarification is therefore required as to how these previously identified constraints have been assessed and overcome. 5.32. In terms of the remaining supply from the Waterfront Regeneration Area, 450 dwellings are forecast to come forward from other brownfield sites identified in the Draft Birkenhead Waterfront Neighbourhood Framework. This has identified capacity for c. 1,600 dwellings, albeit a supply of only 450 dwellings is allowed for owing to "uncertainty over delivering brownfield sites" as referenced in paragraph 9.28 of the Housing Delivery Strategy. Further details are required in relation to which sites/land parcels identified in the Framework the Council expects will realistically be delivered during the Plan period. This does not seem to be available in the Birkenhead 2040 Framework; our Client would request that this detail be included in the Local Plan to allow for greater scrutiny over delivery. It will also give the local community more information over which sites are expected to be developed in their neighbourhood, and when. It also removes some risk of people contesting the principle of development on the grounds that they did not know land was expected to come forward for housing when the Local Plan was in preparation.
omplies with the Duty to co-operate * Yes * No	No
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying	

<p>Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Further detail sought in relation to which sites/ land parcels identified in the Draft Birkenhead Framework the Council expects will realistically be delivered during the Plan period</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? * 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>	

LPSD-1293

Comment ID	LPSD-1293
Person ID	1248438
Include files	LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf
Consultee Name	Country and Coastal Development Ltd
Position	
Company / Organisation	
Agent ID	1248451
Agent Name	Mr Steve Grimster
Position	Director
Company / Organisation	Grimster Planning
Number	Policy RA 3
Title	Birkenhead Waterfront Regeneration Area
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this	RES-RA3.4

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 Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment 5.29. The Regulation 18 Local Plan consultation acknowledged the considerable challenges associated with the development of this area. These include land assembly issues, as well as major infrastructure challenges to overcome including the potential realignment of the A41 at Chester Street and Bridge Street and the possible re-positioning of the bus interchange close to the Woodside Ferry Terminal. 5.30. Since the Regulation 18 consultation, the Draft Birkenhead 2040 Framework has been prepared (and the associated Draft Birkenhead

as precise as possible.	Waterfront Neighbourhood Framework). The Birkenhead Waterfront Regeneration Area is forecast to delivery 630 dwellings during the Plan period. 5.31. As part of this, the Rose Brae site is expected to deliver 180 dwellings. This is a shift in position from the Regulation 18 consultation, in which Appendix 4.4 of the I&O consultation document made reference to the fact that this site was not viable owing to poor ground conditions. It also stated that the site has now been deleted from the Wirral Growth Company trajectory. Clarification is therefore required as to how these previously identified constraints have been assessed and overcome. 5.32. In terms of the remaining supply from the Waterfront Regeneration Area, 450 dwellings are forecast to come forward from other brownfield sites identified in the Draft Birkenhead Waterfront Neighbourhood Framework. This has identified capacity for c. 1,600 dwellings, albeit a supply of only 450 dwellings is allowed for owing to "uncertainty over delivering brownfield sites" as referenced in paragraph 9.28 of the Housing Delivery Strategy. Further details are required in relation to which sites/land parcels identified in the Framework the Council expects will realistically be delivered during the Plan period. This does not seem to be available in the Birkenhead 2040 Framework; our Client would request that this detail be included in the Local Plan to allow for greater scrutiny over delivery. It will also give the local community more information over which sites are expected to be developed in their neighbourhood, and when. It also removes some risk of people contesting the principle of development on the grounds that they did not know land was expected to come forward for housing when the Local Plan was in preparation.
omplies with the Duty to co-operate * Yes * No	No
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying	

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

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

LPSPD-1294

Comment ID	LPSPD-1294
Person ID	1248438
Include files	LPSPD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf LPSPD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf
Consultee Name	Country and Coastal Development Ltd
Position	
Company / Organisation	
Agent ID	1248451
Agent Name	Mr Steve Grimster
Position	Director
Company / Organisation	Grimster Planning
Number	Policy RA 1
Title	Seacombe River Corridor Regeneration Area
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	RA 1
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	please refer to attachment 5.33. In respect of the Seacombe River Corridor, Scotts Quay and Birkenhead Central Regeneration Areas, it is noted that these are forecast to cumulatively deliver 1,590 dwellings from non-specified land parcels during the Plan period. 5.34. It is noted that the Council has made a series of assumptions in relation to delivery, taking account of existing land uses, the brownfield nature of land and possible constraints, and the need for the housing market in those Regeneration Area to be developed/established. As outlined above, it would be beneficial

as precise as possible.	for the Council to confirm which land parcels it expects will realistically deliver during the Plan period to meet this target; whilst some details are provided for the Birkenhead Central Regeneration Area, reference is also made to “other infill and redevelopment sites” in Table 9.5 of the Housing Delivery Strategy for example without providing much more of a steer. As with the above, our Client considers that more site-specific information should be provided within the Local Plan of which sites this will entail, rather than simply a broad figure.
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	the Council to confirm which land parcels it expects will realistically deliver during the Plan period

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),

<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>	

LPSPD-1295

Comment ID	LPSPD-1295
Person ID	1248438
Include files	LPSPD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf LPSPD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf
Consultee Name	Country and Coastal Development Ltd
Position	
Company / Organisation	
Agent ID	1248451
Agent Name	Mr Steve Grimster
Position	Director
Company / Organisation	Grimster Planning
Number	Policy RA 2
Title	Scott's Quay Regeneration Area
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	RA 2
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to Attachment 5.33. In respect of the Seacombe River Corridor, Scotts Quay and Birkenhead Central Regeneration Areas, it is noted that these are forecast to cumulatively deliver 1,590 dwellings from non-specified land parcels during the Plan period. 5.34. It is noted that the Council has made a series of assumptions in relation to delivery, taking account of existing land uses, the brownfield nature of land and possible constraints, and the need for the housing market in those Regeneration Area to be developed/established. As outlined above, it would be beneficial

as precise as possible.	for the Council to confirm which land parcels it expects will realistically deliver during the Plan period to meet this target; whilst some details are provided for the Birkenhead Central Regeneration Area, reference is also made to “other infill and redevelopment sites” in Table 9.5 of the Housing Delivery Strategy for example without providing much more of a steer. As with the above, our Client considers that more site-specific information should be provided within the Local Plan of which sites this will entail, rather than simply a broad figure.
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	the Council to confirm which land parcels it expects will realistically deliver during the Plan period

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

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

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

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

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

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

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

Comment ID	LPSD-1296
Person ID	1324130
Include files	LPSD-1278, 1287, 1290, 1296, 1299 and 1410-EM-Henderson Attach 2507_Redacted.pdf
Consultee Name	Blueoak Estates Ltd
Position	
Company / Organisation	Blueoak Estates Ltd
Agent ID	1324129
Agent Name	Ms Alice Henderson
Position	Senior Planner
Company / Organisation	Asteer Planning
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 Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>Blueoak is generally supportive of the standards proposed under Policy WS 3.1. All of the apartments at the West Kirby Fire Station have been designed to meet or exceed the nationally described space standards. 4no of the apartments have also been designed to be fully accessible in accordance with Approved Document M4(2): Wheelchair accessible and adaptable dwellings.</p> <p>Planning Practice Guidance ('PPG') (Paragraph: 020 Reference ID: 56-020-20150327) states that "there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions."</p>

	<p>Whilst PPG doesn't explicitly refer to a transitional period in relation to the other standards within Policy WS 3.1, Blueoak would suggest that Policy WS 3.1 contains a transitional period for the introduction of the policy to enable the implications to be factored into site acquisitions and development going forward, and not render current planning applications unviable by imposing an unaccounted for requirement.</p> <p>A similar approach was recently reflected in Main Modifications for the emerging Cheshire East Site Allocations Development Plan Document ('SADPD') which is currently undergoing examination and is due to be adopted this year. In this nearby and recent case, the Inspector proposed a 6-month transition period to allow developers to adjust appropriately.</p>
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	

<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>Blueoak therefore requests that the following additional text is added to Policy WS 3.1: <i>"The standards within Policy WS 3.1 will apply from six months after the date of adoption of the Plan."</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 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-1297
Person ID	1248438
Include files	LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf
Consultee Name	Country and Coastal Development Ltd
Position	
Company / Organisation	
Agent ID	1248451
Agent Name	Mr Steve Grimster
Position	Director
Company / Organisation	Grimster Planning
Number	Policy RA 4
Title	Central Birkenhead Regeneration Area
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	RA 4
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment 5.33. In respect of the Seacombe River Corridor, Scotts Quay and Birkenhead Central Regeneration Areas, it is noted that these are forecast to cumulatively deliver 1,590 dwellings from non-specified land parcels during the Plan period. 5.34. It is noted that the Council has made a series of assumptions in relation to delivery, taking account of existing land uses, the brownfield nature of land and possible constraints, and the need for the housing market in those Regeneration Area to be developed/established. As outlined above, it would be beneficial

as precise as possible.	for the Council to confirm which land parcels it expects will realistically deliver during the Plan period to meet this target; whilst some details are provided for the Birkenhead Central Regeneration Area, reference is also made to “other infill and redevelopment sites” in Table 9.5 of the Housing Delivery Strategy for example without providing much more of a steer. As with the above, our Client considers that more site-specific information should be provided within the Local Plan of which sites this will entail, rather than simply a broad figure.
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	the Council to confirm which land parcels it expects will realistically deliver during the Plan period

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

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

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

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

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

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

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

LPSD-1298

Comment ID	LPSD-1298
Person ID	1248438
Include files	LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf
Consultee Name	Country and Coastal Development Ltd
Position	
Company / Organisation	
Agent ID	1248451
Agent Name	Mr Steve Grimster
Position	Director
Company / Organisation	Grimster Planning
Number	Part 4
Title	Regeneration Policies
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	4.1
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment 5.35. In terms of completion dates, these Regeneration Areas and Broad Locations for Growth would cumulatively deliver the following: 2022/23 – 120 dwellings 2023/24 – 436 dwellings 2024/25 – 2,100 dwellings 2025/26 – None stated 2026/27 – 1,637 dwellings 2027/28 – 1,000 dwellings 2028/29 – 2,900 dwellings 2029/30 – 335 dwellings 2030/31 – None stated 2031/32 – 240 dwellings 2032/33 – 250 dwellings 5.36. Based on the above, it is projected that 4,293 dwellings will come forward in the five-year period 2022/23 and 2026/27, and 4,725 dwellings

as precise as possible.	between 2027/28 and 2032/33 before the 10% slippage is applied. 5.37. For years 2022/23, this would equate to 773 dwellings per year from these Regeneration Areas and Broad Locations for Growth in isolation (inclusive of a 10% slippage). 5.38. For years 2027/28 to 2032/33, this would equate to 850 dwellings per year from these Regeneration Areas and Broad Locations for Growth in isolation (inclusive of a 10% slippage). 5.39. Of the dwellings that are forecast to come forward in the Regeneration Areas, 3,305 of these are on land in "other developable areas" which for the purposes of the SD have not been identified. That equates to 206 dwellings a year from as yet unknown parcels of land. Evidently, the Council is placing a significant reliance on the delivery of land in "other developable areas" within the Regeneration Area; our Client is concerned that land being available for development does not necessarily translate into land coming forward and being realised for development. There are no historic trends upon which the Council can draw, nor support their position, which would provide certainty or comfort that they will indeed deliver at the rate projected. 5.40. Given that the Council's development and spatial strategy is so clearly predicated on the re-use of brownfield land in east and north-east Wirral, historic failures associated with adopting a comparable approach means that there needs to be much greater certainty over the sources of supply identified in Table 1 above. At present, it is considered that too much information is lacking in respect of the "other developable areas" supply of land within the Regeneration Areas in order for the SD to be considered 'sound.'
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	

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

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

Comment ID	LPSD-1299
Person ID	1324130
Include files	LPSD-1278, 1287, 1290, 1296, 1299 and 1410-EM-Henderson Attach 2507_Redacted.pdf
Consultee Name	Blueoak Estates Ltd
Position	
Company / Organisation	Blueoak Estates Ltd
Agent ID	1324129
Agent Name	Ms Alice Henderson
Position	Senior Planner
Company / Organisation	Asteer Planning
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	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	Please refer to attachment Draft Policy WS 3.2 sets out minimum density standards for new residential development dependent on their location and accessibility. For 'Urban Core & Town Centres Density Zones (RES-DZ2)' the minimum density standard is 60 dwellings per hectare. Blueoak is supportive of this approach to maximising density which allows for the most efficient use of land. The proposed development at West Kirby Fire Station is approximately 196 dwellings per hectare which exceeds the minimum proposed density standard for this area and is appropriate to the prevailing character of the area. Blueoak's approach full accords with paragraphs 119, 120 and 124 of the National Planning Policy Framework.
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:

<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-1300

Comment ID	LPSD-1300
Person ID	1248438
Include files	LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf
Consultee Name	Country and Coastal Development Ltd
Position	
Company / Organisation	
Agent ID	1248451
Agent Name	Mr Steve Grimster
Position	Director
Company / Organisation	Grimster Planning
Number	Policy RA 9
Title	Liscard Regeneration Area
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	RA 9
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to the attachment As with the larger Regeneration Areas, as shown in Table 2 above there remains a strong reliance on the delivery of land in “other developable areas” within the Regeneration Areas, with just 165 dwellings coming forward on identified parcels/allocations. Further, and as with the larger Regeneration Areas, land being available for development does not necessarily translate into land coming forward and being realised for development. As such, there is a great deal of uncertainty surrounding the delivery of 459 dwellings in these three Regeneration Areas

as precise as possible.	during the Plan period, and no historic trends which would provide certainty or comfort that they will indeed deliver. 5.45. In terms of completion dates, these would cumulatively deliver the following: 2022/23 – 13 dwellings 2023/24 – None stated 2024/25 – 82 dwellings 2025/26 – 139 dwellings 2026/27 – 40 dwellings 2027/28 – None stated 2028/29 – 100 dwellings 2029/30 – 250 dwellings 5.46. Based on the above, it is projected that 274 dwellings will come forward in the five-year period 2022/23 and 2026/27, and 350 dwellings between 2027/28 and 2032/33 before the slippage is applied. 5.47. For years 2022/23, this would equate to 49 dwellings per year from these Regeneration Areas in isolation (inclusive of a 10% slippage). 5.48. For years 2027/28 to 2032/33, this would equate to 63 dwellings per year from these Regeneration Areas isolation (inclusive of a 10% slippage)
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.	

<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>more information on 'other developable areas' needed</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>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>	