

LPSD-1301

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| <b>Comment ID</b>  | LPSD-1301  |
| <b>Person ID</b>   | 1248438  |
| <b>Include files</b>   | <a href="#">LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf</a><br><a href="#">LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>  | Country and Coastal Development Ltd  |
| <b>Position</b>  |  |
| <b>Company / Organisation</b>  |  |
| <b>Agent ID</b>  | 1248451  |
| <b>Agent Name</b>  | Mr<br>Steve<br>Grimster  |
| <b>Position</b>  | Director   |
| <b>Company / Organisation</b>  | Grimster Planning  |
| <b>Number</b>  | Policy RA 10   |
| <b>Title</b>   | New Brighton Regeneration Area   |
| <b>To which part of the Local Plan does this representation relate?</b>  | Policy   |
| <ul style="list-style-type: none"> <li>* Paragraph(s)</li> <li>* Policy</li> <li>* Site</li> <li>* Policies Map</li> <li>* Sustainability Appraisal</li> <li>* Habitat Regulations Assessment</li> </ul> |  |
| <b>Please state which paragraph number(s) this representation relates to.</b>  |  |
| <b>Please state which Policy Number this representation relates to.</b>  | RA 10  |
| <b>Please state which Site ID/Reference this</b>   |  |

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

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| <b>as precise as possible.</b>   | 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) |
| <b>omplies with the Duty to co-operate</b><br>* Yes<br>* No  | Yes  |
| <b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>  |  |
| <b>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.</b>   |  |
| <b>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.</b>        |  |
| <b>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.</b> |  |

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| <p><b>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.</b></p> | <p>more information on 'other developable areas' needed</p> |
| <p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></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>     |

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| <b>Comment ID</b>   | LPSD-1302  |
| <b>Person ID</b>  | 1248438  |
| <b>Include files</b>  | <a href="#">LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf</a><br><a href="#">LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Country and Coastal Development Ltd  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Agent ID</b>   | 1248451  |
| <b>Agent Name</b>   | Mr<br>Steve<br>Grimster  |
| <b>Position</b>   | Director   |
| <b>Company / Organisation</b>   | Grimster Planning  |
| <b>Number</b>   | Policy RA 11   |
| <b>Title</b>  | New Ferry Regeneration Area  |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Policy   |
| <b>Please state which paragraph number(s) this representation relates to.</b>   |  |
| <b>Please state which Policy Number this representation relates to.</b>   | RA 11  |
| <b>Please state which Site ID/Reference this</b>  |  |

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| representation relates to.   |   |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |   |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Justified<br>Not Effective<br>Not Consistent with National Policy   |
| Please give details of why you consider the Local Plan is unsound. Please be   | Please refer to attachment<br>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 |

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| <b>as precise as possible.</b>   | 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) |
| <b>omplies with the Duty to co-operate</b><br>* Yes<br>* No  | Yes  |
| <b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>  |  |
| <b>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.</b>   |  |
| <b>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.</b>        |  |
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| <p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></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>     |

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LPSD-1303

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| <b>Comment ID</b>   | LPSD-1303  |
| <b>Person ID</b>  | 1248438  |
| <b>Include files</b>  | <a href="#">LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf</a><br><a href="#">LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Country and Coastal Development Ltd  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Agent ID</b>   | 1248451  |
| <b>Agent Name</b>   | Mr<br>Steve<br>Grimster  |
| <b>Position</b>   | Director   |
| <b>Company / Organisation</b>   | Grimster Planning  |
| <b>Number</b>   | Policy WS 6.3  |
| <b>Title</b>  | Masterplan Areas   |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Policy   |
| <b>Please state which paragraph number(s) this representation relates to.</b>   |  |
| <b>Please state which Policy Number this representation relates to.</b>   | WS 6.3 (and para 3.13)   |
| <b>Please state which Site ID/Reference this</b>  |  |

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| representation relates to.   |  |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |  |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Justified<br>Not Effective<br>Not Consistent with National Policy  |
| Please give details of why you consider the Local Plan is unsound. Please be   | Please refer to attachment<br>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. |

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| as precise as possible.   |     |
| omplies with the Duty to co-operate<br>* Yes<br>* 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.   |     |
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| Please set out the modification(s) you consider necessary to make the Local   |     |

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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)

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| <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> |  |

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| <b>Comment ID</b>  | LPSD-1304  |
| <b>Person ID</b>   | 1248438  |
| <b>Include files</b>   | <a href="#">LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf</a><br><a href="#">LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>  | Country and Coastal Development Ltd  |
| <b>Position</b>  |  |
| <b>Company / Organisation</b>  |  |
| <b>Agent ID</b>  | 1248451  |
| <b>Agent Name</b>  | Mr<br>Steve<br>Grimster  |
| <b>Position</b>  | Director   |
| <b>Company / Organisation</b>  | Grimster Planning  |
| <b>Number</b>  | Policy WS 1.1  |
| <b>Title</b>   | Homes  |
| <b>To which part of the Local Plan does this representation relate?</b>  | Policy   |
| <ul style="list-style-type: none"> <li>* Paragraph(s)</li> <li>* Policy</li> <li>* Site</li> <li>* Policies Map</li> <li>* Sustainability Appraisal</li> <li>* Habitat Regulations Assessment</li> </ul> |  |
| <b>Please state which paragraph number(s) this representation relates to.</b>  |  |
| <b>Please state which Policy Number this representation relates to.</b>  | WS 1.1   |
| <b>Please state which Site ID/Reference this</b>   |  |



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| representation relates to.   |  |
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| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Justified<br>Not Effective<br>Not Consistent with National Policy  |
| Please give details of why you consider the Local Plan is unsound. Please be   | Please refer to attachment<br>In view of our Client's concerns relating to the Council's development and spatial strategy, it remains our Client's strong contention that Green Belt land release for housing as part of the new Local Plan is essential and unavoidable, if the housing needs of the Wirral are to be met by the end of the Plan period. Our Client's position on this matter takes account of the following:<br>The need to ensure a balanced approach to housing delivery across the Wirral, ensuring that lessons from the past are learnt (i.e. the Interim Housing Policy) which led to a shortfall in |

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| as precise as possible.  | <p>net housing completions and with it a lack of new housing delivery in west Wirral to meet housing needs (market and affordable housing); The uncertainty regarding the deliverability of brownfield sites to meet the minimum housing requirement and the concentration of new development in east and north-east Wirral, and the implications for market demand and market saturation, whilst failing to meet the housing needs of the Borough's residents as a whole; The ability to deliver a mix of house types and tenures and in doing so accounting for the housing needs of different groups in society; The need to provide for different types of housing to attract inward investment into the Borough, ranging from aspirational family housing, through to First Homes for young people/workers/first time buyers looking to get a foot on the property ladder and to remain/relocate in the Borough; and Ø The need to ensure that the social, economic and environmental benefits of sustainable development are dispersed across Wirral, as opposed to being concentrated towards one or two areas, leading to the neglect of other parts of the Borough which are equally in need w housing and investment in jobs, services and facilities and education over the next 15 years. 6.5. It is noted that Spatial Option 2a of the Issues and Options Consultation went as far as identifying a number of potential Green Belt sites to be released for residential development during the emerging Local Plan period at that time. Cumulatively, these sites could have delivered 1,106 homes over the emerging Local Plan period. 6.6. It is noted that this included our Client's land interests in Irby (Site Ref. 8) to the west of Sandy Lane, for the development of approximately 92 dwellings. Our Client was and remains fully supportive of the allocation of this land for housing, and we comment on this further later in this Representation. 6.7. It is disappointing to note that the Council has not pursued Spatial Option 2a within the SD; our Client remains firmly of the view that a dispersed approach to Green Belt release across west Wirral is required, alongside the redevelopment and regeneration of land in east Wirral, in order to ensure a sound Local Plan and a balanced development and spatial strategy. 6.10. In respect of (a), based on the observations and concerns presented in Section 5 of this Statement, it is our Client's position that the Council's sources of supply will fail to deliver the amount of new housing that is needed in the Wirral over the Plan period. Accordingly, there is a need to provide for a more balanced distribution to housing delivery across the Wirral up to 2037 and beyond, and which necessitates a review of Green Belt boundaries now as part of the new Local Plan (as a minimum, to identify safeguarded land for the reasons set out later in this Section). Our Client considers this to sufficient evidence in itself to constitute the exceptional circumstances for a review of and the release of Green Belt land as part of the new Local Plan, contrary to paragraph 1.3 of the SD. This position is consistent with the Council's own position back in September 2018 as part of its Development Options Review during which it identified 48 Green Belt sites deemed to be worthy of further investigation to help meet its future housing needs. As it stands, the SD represents a missed opportunity, and a development and spatial strategy who could lead to continued issues of housing under-delivery, lack of affordability, and imbalance moving forward. As part of its Development Options Review in September 2018, the Council accepted that there was a need for Green Belt release in the Wirral to meet the Borough's future housing needs. As part of this process, the Council identified 48 sites for further investigation. The evidence base to inform the identification of these 48 sites was subject to significant objection; accordingly, an updated Green Belt methodology and assessment was published by the Council as part of its evidence base to the I&amp;O document. This assessed sites in respect of whether they were considered to make 'no' overall contribution to the Green Belt, a 'weak' overall contribution to the Green Belt, a 'moderate' overall contribution to the Green Belt, or a 'strong' overall contribution to the Green Belt. Those sites identified to make 'no' or a 'weak' overall contribution to the Green Belt were viewed as having the greatest potential (in purely Green Belt terms) to form part of the supply of deliverable and developable sites. 6.12. On review of the Green Belt Parcel Assessment contained at Figure 8 of the 2019 Green Belt Review, it was noted that the Council has adopted a different approach to that in the 2017 Green Belt Assessment, with a more consistent approach to the scale of Green Belt Parcels. 6.13. To this end, our Client fully supported the identification of their land interests at Site Ref. 8 (Green Belt Parcel 7.25) as a potential Green Belt release and housing allocation in the Issues and Options consultation document, whilst noting that the Green Belt Review confirmed the outcomes from the Assessment did not mean that certain parcels should or should not be released from the Green Belt; however, higher performing Green Belt parcels would be required to demonstrate a stronger exceptional circumstances case. 6.14. Overall, the methodology applied by the Council in the preparation of its revised Green Belt Assessment was considered to be more robust than that previously prepared in 2018. That remains the case. 6.15. Furthermore, our Client remains firmly of the view that their land interests represent a logical and appropriate Green Belt land release, as documented in Section 11 of this Representation.</p> |
| <b>omplies with the Duty to co-operate</b><br>* Yes<br>* No  | Yes   |
| <b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>        |   |
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LPSD-1305

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| <b>Comment ID</b>   | LPSD-1305  |
| <b>Person ID</b>  | 1248438  |
| <b>Include files</b>  | <a href="#">LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf</a><br><a href="#">LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Country and Coastal Development Ltd  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Agent ID</b>   | 1248451  |
| <b>Agent Name</b>   | Mr<br>Steve<br>Grimster  |
| <b>Position</b>   | Director   |
| <b>Company / Organisation</b>   | Grimster Planning  |
| <b>Number</b>   | Policy WS 1.1  |
| <b>Title</b>  | Homes  |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Policy   |
| <b>Please state which paragraph number(s) this representation relates to.</b>   |  |
| <b>Please state which Policy Number this representation relates to.</b>   | WS 1.1   |
| <b>Please state which Site ID/Reference this</b>  |  |

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| representation relates to.   |   |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |   |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Justified<br>Not Effective<br>Not Consistent with National Policy   |
| Please give details of why you consider the Local Plan is unsound. Please be   | Please refer to attachment<br>Safeguarded Land 6.16. As outlined above, it is our Client's position that the new Local Plan for Wirral requires Green Belt release. The exceptional circumstances for this are considered to exist, consistent with paragraph 140 of the NPPF. 6.17. In the event that the Local Plan Inspector does not agree, as a very minimum it is considered that the SD should be identifying safeguarded land for future release in order to meet longer-term needs stretching beyond the Plan period. This would be consistent with paragraph 143(c) of the NPPF. Given the concerns |

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| <b>as precise as possible.</b>   | already expressed within this Representation regarding the Council's development and spatial strategy, there is absolutely no question that Green Belt release will be required to meet housing needs beyond the Plan period. There is simply no alternative, given that all greenfield land across the Wirral is designated as Green Belt. 6.18. To this end, the SD needs to be re-visited and amended to identify safeguarded land for future release. This should be undertaken now, and not deferred to any future Local Plan Review; such an approach would be otherwise contrary to the guidance contained in paragraph 139(c) of the NPPF. |
| <b>omplies with the Duty to co-operate</b><br>* Yes<br>* No  | Yes  |
| <b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>  |  |
| <b>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.</b>   |  |
| <b>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.</b>        |  |
| <b>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.</b> |  |
| <b>Please set out the modification(s) you</b>  | identify safeguarded land as a minimum   |

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



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| hearing session(s), please outline why you consider this to be necessary:  |     |
| <p><b>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).</b></p> <p>*     Yes</p> <p>*     No</p> | Yes |

LPSP-1306

|   |  |
|---|--|
| <b>Comment ID</b>   | LPSP-1306  |
| <b>Person ID</b>  | 1248438  |
| <b>Include files</b>  | <a href="#">LPSP-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf</a><br><a href="#">LPSP-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Country and Coastal Development Ltd  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Agent ID</b>   | 1248451  |
| <b>Agent Name</b>   | Mr<br>Steve<br>Grimster  |
| <b>Position</b>   | Director   |
| <b>Company / Organisation</b>   | Grimster Planning  |
| <b>Number</b>   | Policy WS 1.1  |
| <b>Title</b>  | Homes  |
| <b>To which part of the Local Plan does this representation relate?</b>       | Sustainability Appraisal   |
| * Paragraph(s)  |  |
| * Policy  |  |
| * Site  |  |
| * Policies Map  |  |
| * Sustainability Appraisal  |  |
| * Habitat Regulations Assessment  |  |
| <b>Please state which paragraph number(s) this representation relates to.</b> |  |
| <b>Please state which Policy Number this representation relates to.</b>       |  |
| <b>Please state which Site ID/Reference this</b>                              |  |

|  |   |
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| representation relates to.   |   |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |   |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Justified<br>Not Effective<br>Not Consistent with National Policy |
| Please give details of why you consider the Local Plan is unsound. Please be   |   |

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| as precise as possible.  |  |
| <b>omplies with the Duty to co-operate</b><br>*        Yes<br>*        No  | Yes  |
| <b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>  |  |
| <b>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.</b>   |  |
| <b>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.</b>        | <p>please refer to attachment</p> <p>Sustainability Appraisal 6.19. On review of the Council's Sustainability Appraisal prepared for the previous Issues and Options Consultation document, it is noted that spatial option 2a would generate significant positive effects in respect of housing. In terms of the environmental impacts, these were largely minor negative owing to the release of greenfield land, albeit our Client expressed concern at how these judgements had been arrived at. 6.20. Turning to the SD, the Council has prepared a new Sustainability Appraisal published in April 2022. It is noted that paragraph 3.3.35 refers to the alternative developments options that were tested at the Regulation 18 stage, including Green Belt release. The Sustainability Appraisal states this was considered an unreasonable option and thus has not been tested in the latest version. For the wide range of reasons set out in this Representation, our Client does not consider that a 'sound' Local Plan can be advanced and adopted without adopting a positive approach towards some Green Belt release in the Wirral, and accordingly this option should be fully tested as part of the Sustainability Appraisal.</p> |
| <b>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.</b> |  |
| <b>Please set out the modification(s) you consider necessary to make the Local</b>   |  |

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

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| you consider this to be necessary:   |     |
| <p><b>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).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p> | Yes |

LPSD-1307

|   |  |
|---|--|
| <b>Comment ID</b>   | LPSD-1307  |
| <b>Person ID</b>  | 1248438  |
| <b>Include files</b>  | <a href="#">LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf</a><br><a href="#">LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Country and Coastal Development Ltd  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Agent ID</b>   | 1248451  |
| <b>Agent Name</b>   | Mr<br>Steve<br>Grimster  |
| <b>Position</b>   | Director   |
| <b>Company / Organisation</b>   | Grimster Planning  |
| <b>Number</b>   | Policy WP 8.1  |
| <b>Title</b>  | Green Belt   |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Policy   |
| <b>Please state which paragraph number(s) this representation relates to.</b>   |  |
| <b>Please state which Policy Number this representation relates to.</b>   | WP 8.1   |
| <b>Please state which Site ID/Reference this</b>  |  |

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| representation relates to.   |  |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |  |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Justified<br>Not Effective<br>Not Consistent with National Policy  |
| Please give details of why you consider the Local Plan is unsound. Please be   | Please refer to attachment<br>This Policy is very short, and simply defers to national planning policy when it's comes to the determination of planning applications within the Rural Settlement Area (i.e. all Green Belt land). 6.22. It is noted that paragraph 3.67 of the SD makes reference to rural exception sites as a national exemption. However, paragraph 149(f) of the NPPF is clear that limited affordable housing in the Green Belt for local community needs can only come forward "under policies set out in the development plan." The SD as drafted contains no such policy; accordingly, |



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| <b>as precise as possible.</b>   | whilst referred to in paragraph 3.67 of the SD, there is no specific rural exception policy or mechanism by which to deliver such affordable housing schemes. This is a significant omission. 6.23. Given the Green Belt constraints across the Wirral already documented in this Representation, this simply serves to further prevent housing development in large parts of the Wirral, in particular those towns and villages in the west where a need exists as proven within the SHMA where paragraph 3.6 of the 2021 Update refers to an "east to west drift of increasing house prices." Affordability is and will remain a major issue in west Wirral. Accordingly, there is no reason not to include such a policy in the new Local Plan, particularly given that the SD is not planning to meet the annual affordable housing needs identified in the SHMA as referenced earlier in this Representation (despite affordable housing delivery trends between 2015/16 and 2019/20). As such, there is strong justification for the inclusion of a specific rural exception policy to be included in the Local Plan, and which will provide an additional opportunity to deliver much-needed new affordable housing in the Wirral of different types and tenures. |
| <b>omplies with the Duty to co-operate</b><br>* Yes<br>* No  | Yes  |
| <b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>  |  |
| <b>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.</b>   |  |
| <b>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.</b>        |  |
| <b>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.</b> |  |

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| <p><b>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.</b></p> | <p>there is strong justification for the inclusion of a specific rural exception policy to be included in the Local Plan, and which will provide an additional opportunity to deliver much-needed new affordable housing in the Wirral of different types and tenures.</p> |
| <p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></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>  |

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| <p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>  |  |
| <p><b>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).</b></p> <p>*     <b>Yes</b></p> <p>*     <b>No</b></p> |  |

LPSP-1308

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| <b>Comment ID</b>   | LPSP-1308  |
| <b>Person ID</b>  | 1248438  |
| <b>Include files</b>  | <a href="#">LPSP-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf</a><br><a href="#">LPSP-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Country and Coastal Development Ltd  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Agent ID</b>   | 1248451  |
| <b>Agent Name</b>   | Mr<br>Steve<br>Grimster  |
| <b>Position</b>   | Director   |
| <b>Company / Organisation</b>   | Grimster Planning  |
| <b>Number</b>   | Policy WS 1.3  |
| <b>Title</b>  | Infrastructure   |
| <b>To which part of the Local Plan does this representation relate?</b>       | Policy   |
| * Paragraph(s)  |  |
| * Policy  |  |
| * Site  |  |
| * Policies Map  |  |
| * Sustainability Appraisal  |  |
| * Habitat Regulations Assessment  |  |
| <b>Please state which paragraph number(s) this representation relates to.</b> |  |
| <b>Please state which Policy Number this representation relates to.</b>       | WS 1.3   |
| <b>Please state which Site ID/Reference this</b>                              |  |

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| representation relates to.   |  |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |  |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Justified<br>Not Effective<br>Not Consistent with National Policy  |
| Please give details of why you consider the Local Plan is unsound. Please be   | Please refer to attachment.<br>The Council's proposed spatial strategy, focusing development in east and north-east Wirral, will place a significant strain on the existing infrastructure in that location and require significant investment. This pressure would be diminished to some degree by adopting a dispersed approach to new development across the whole of the Wirral, with a much more balanced approach to delivery across Settlement Areas 5, 6, 7 and 8. 7.6. On review of Appendix A of the IDP, it is noted that there are some significant funding gaps for schemes in the Regeneration Areas |

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| <b>as precise as possible.</b>  | <p>to deliver linear parks and active travel corridors, equating to some £29 million (IDP Number TR-AT1 and TR-AT2). Another current funding gap is for the delivery of local cycling and walking infrastructure between New Brighton and Birkenhead, which stands at £14 million. 7.7. Whilst these schemes are listed as “desirable,” the reality is that as high-density schemes are going to be delivered in these Areas, there is a need to ensure that development is supported by alternative greenspace and sustainable travel modes (this also includes the Mass Transit System for which there is a funding gap). As it stands, there remains a significant funding shortfall for such provision; an update on this funding gap needs to be provided at the time of the Examination in Public. 7.8. The same applies to those schemes listed as “essential” in Appendix A of the IDP. Whilst the funding gaps are smaller, they remain significant in isolation and again relate to sustainable travel, education and open space provision. This should again be explored further and update at the Examination in Public. 7.9. Whilst the Council's approach towards locating new development in locations well-supported by existing public transport provision is welcomed, it is clear from the IDP that the preferred strategy to locate the majority of new development in the urban conurbation will significantly increase the pressure on public transport services and infrastructure in those locations. The pressure on these services and infrastructure will be much greater than if a much more balanced spatial strategy and distribution were pursued. Further, there is the very real risk that public transport services and infrastructure in west Wirral are overlooked and subject to little or no investment to maintain and upgrade them. 7.10. From a social infrastructure perspective, the delivery of over 13,000 new homes in the Wirral will inevitably increase the pressure on services such as Schools, Medical/Health Centres and Local Sports/Recreation Facilities. Accordingly, it will be necessary for all new development to make a contribution to social infrastructure where this satisfies the tests set out under paragraph 57 of the NPPF. This should be managed through detailed and fully tested development management policies. As part of the plan-making process, the Council should be satisfied that its proposed site allocations are capable of being policy compliant when it comes to matters such as public open space and any off-site contributions towards the likes of education, health and recreation. Our Client is already concerned that the level of affordable housing being targeted for delivery during the Plan period is being compromised as a result of the Council's proposed spatial strategy and distribution; failing to deliver on other policy requirements simply cannot be viewed as the Local Plan being positively prepared. A demonstration of the overall viability of the proposed site allocations, taking account of all policy and development cost/abnormal cost considerations should help to alleviate any concerns over their deliverability and reduce the need for viability discussions as part of the planning application process (and with it delays to the determination process). 7.11. It is noted that the SD commits to infrastructure improvements being delivered through developer contributions in the form of planning obligations (S106), planning conditions, and S278 highways agreements where appropriate. There is no commitment to introduce a Community Infrastructure Levy. Our Client has no objection to this approach, provided that the contributions which are sought from developments are based on up-to-date and robust evidence, fully justified and satisfy the tests set out under paragraph 57 of the NPPF and Regulation 122(2) of the Community Infrastructure Levy Regulations 2010.</p> |
| <b>complies with the Duty to co-operate</b><br>* Yes<br>* No  | Yes   |
| <b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>                                 |   |
| <b>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.</b>                          |   |
| <b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability</b> |   |

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| 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. | further up to date information needed on infrastructure funding gaps |
| If your representation is seeking a  | Yes, I wish to participate in hearing session(s)                     |

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| <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>QA added coding, and text under MM</p> |
| <p><b>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).</b></p> <p>* Yes</p> <p>* No</p> |   |



LPSPD-1309

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| <b>Comment ID</b>   | LPSPD-1309   |
| <b>Person ID</b>  | 1248438  |
| <b>Include files</b>  | <a href="#">LPSPD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf</a><br><a href="#">LPSPD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Country and Coastal Development Ltd  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Agent ID</b>   | 1248451  |
| <b>Agent Name</b>   | Mr<br>Steve<br>Grimster  |
| <b>Position</b>   | Director   |
| <b>Company / Organisation</b>   | Grimster Planning  |
| <b>Number</b>   | Policy WS 7.1  |
| <b>Title</b>  | Design Principles  |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Policy   |
| <b>Please state which paragraph number(s) this representation relates to.</b>   |  |
| <b>Please state which Policy Number this representation relates to.</b>   | WS 7.1   |
| <b>Please state which Site ID/Reference this</b>  |  |

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| representation relates to.   |  |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |  |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Justified<br>Not Effective<br>Not Consistent with National Policy  |
| Please give details of why you consider the Local Plan is unsound. Please be   | Please refer to attachment<br>Our Client supports the Council's aspiration to drive and deliver a high standard of design across the Wirral as part of new development. This aligns with a key objective set out in the NPPF, and the National Design Guide. It is important that the Council's design principles afford a degree of flexibility to development, as not all schemes will be as capable (viability wise) as others to meet all of the Policy criteria. As such, the Policy should be applied on a site by site, scheme by scheme basis taking account of the particular circumstances related to that |

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| <b>as precise as possible.</b>   | <p>development (i.e type, size and tenure of development, existing land-use, land classification, abnormal costs etc). 7.13. In view of the Council's development and spatial strategy, which will inevitably involve higher density schemes and with it taller buildings, the application of part 3 of the Policy will require careful consideration. There are known examples of schemes in the Wirral for 3 storey buildings being refused where adjacent to/surrounded by two-storey residential properties (on the grounds that they are considered harmful to the character and appearance of the area). This includes the scheme for a 3-storey extra-care development at The Stirrup in Woodchurch, as referenced in paragraph 7.7 of the Housing Delivery Strategy, and which has been refused twice on appeal on the grounds of scale and design. The introduction of much taller and modern buildings into an existing residential landscape(s) dominated by traditional two-storey dwellings will therefore require very careful consideration as otherwise this has the potential to stifle development when adopting a consistent approach to decision-taking as has gone before</p> |
| <b>omplies with the Duty to co-operate</b><br>*        Yes<br>*        No  | Yes  |
| <b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>  |  |
| <b>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.</b>   |  |
| <b>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.</b>        |  |
| <b>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.</b> |  |

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

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| <p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>  |  |
| <p><b>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).</b></p> <p>*     <b>Yes</b></p> <p>*     <b>No</b></p> |  |

LPSD-1310

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| <b>Comment ID</b>   | LPSD-1310  |
| <b>Person ID</b>  | 1248438  |
| <b>Include files</b>  | <a href="#">LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf</a><br><a href="#">LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Country and Coastal Development Ltd  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Agent ID</b>   | 1248451  |
| <b>Agent Name</b>   | Mr<br>Steve<br>Grimster  |
| <b>Position</b>   | Director   |
| <b>Company / Organisation</b>   | Grimster Planning  |
| <b>Number</b>   | Policy WS 7.2  |
| <b>Title</b>  | Privacy and Amenity  |
| <b>To which part of the Local Plan does this representation relate?</b>       | Policy   |
| * Paragraph(s)  |  |
| * Policy  |  |
| * Site  |  |
| * Policies Map  |  |
| * Sustainability Appraisal  |  |
| * Habitat Regulations Assessment  |  |
| <b>Please state which paragraph number(s) this representation relates to.</b> |  |
| <b>Please state which Policy Number this representation relates to.</b>       | WS 7.2   |
| <b>Please state which Site ID/Reference this</b>                              |  |

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| representation relates to.   |   |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |   |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Justified<br>Not Effective<br>Not Consistent with National Policy   |
| Please give details of why you consider the Local Plan is unsound. Please be   | Please refer to attachment<br>Policy WS7.2, which seeks to protect the privacy and amenity of neighbouring users. This includes ensuring that new development continues to provide adequate sunlight, daylight and open aspects to all parts of a new scheme, as well as adjacent buildings and land. Proposals are also expected to avoid direct overlooking and loss of privacy detrimental to the living conditions of neighbouring residents, and should not be overbearing; this may prove something of a challenge in the Waterfront, Urban Core/Town Centre and Transit Area Density Zones |

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| <b>as precise as possible.</b>   | where higher-density development is expected to be delivered under Policy WS3.2 of the SD. Careful consideration needs to be given to ensuring that the Council's proposed spatial strategy and distribution, and the reliance on higher density development to meet its housing requirements, will be capable of delivering at the scale required taking account of these important and relevant design policy considerations. |
| <b>omplies with the Duty to co-operate</b><br>* Yes<br>* No  | Yes   |
| <b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>  |   |
| <b>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.</b>   |   |
| <b>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.</b>        |   |
| <b>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.</b> |   |
| <b>Please set out the modification(s) you consider necessary</b>   |   |



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),

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| <p>please outline why you consider this to be necessary:</p>   |  |
| <p><b>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).</b></p> <p>*      Yes</p> <p>*      No</p> |  |

LPSPD-1311

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| <b>Comment ID</b>   | LPSPD-1311   |
| <b>Person ID</b>  | 1248438  |
| <b>Include files</b>  | <a href="#">LPSPD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf</a><br><a href="#">LPSPD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Country and Coastal Development Ltd  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Agent ID</b>   | 1248451  |
| <b>Agent Name</b>   | Mr<br>Steve<br>Grimster  |
| <b>Position</b>   | Director   |
| <b>Company / Organisation</b>   | Grimster Planning  |
| <b>Number</b>   | Policy WS 7.4  |
| <b>Title</b>  | Parking  |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Policy   |
| <b>Please state which paragraph number(s) this representation relates to.</b>   |  |
| <b>Please state which Policy Number this representation relates to.</b>   | WS 7.4   |
| <b>Please state which Site ID/Reference this</b>  |  |

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| representation relates to.   |   |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |   |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Justified<br>Not Effective<br>Not Consistent with National Policy   |
| Please give details of why you consider the Local Plan is unsound. Please be   | Please refer to attachment<br>Policy WS7.4 would appear to strike the right balance in respect of what is required; electric vehicle charging infrastructure should be provided as part of all new developments, whilst a relaxation of car parking standards for schemes in accessible areas is supported by our Client. However, there is no definition of what is a 'highly accessible area' for the purpose of this Policy, which could result in some matters of subjective dispute at the time of a planning application being advanced. To provide some clarity and certainty for applicants, it would be beneficial for this to be clarified within the new Local Plan. |

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| as precise as possible.  |   |
| <b>omplies with the Duty to co-operate</b><br>*      Yes<br>*      No  | Yes   |
| <b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>  |   |
| <b>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.</b>   |   |
| <b>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.</b>        |   |
| <b>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.</b> |   |
| <b>Please set out the modification(s) you consider necessary to make the Local</b>   | define a 'highly accessible area' for the purpose of this Policy, |

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)

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

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| <b>Comment ID</b>   | LPSD-1312  |
| <b>Person ID</b>  | 1248438  |
| <b>Include files</b>  | <a href="#">LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf</a><br><a href="#">LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Country and Coastal Development Ltd  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Agent ID</b>   | 1248451  |
| <b>Agent Name</b>   | Mr<br>Steve<br>Grimster  |
| <b>Position</b>   | Director   |
| <b>Company / Organisation</b>   | Grimster Planning  |
| <b>Number</b>   | Policy WS 9.2  |
| <b>Title</b>  | Accessibility and Sustainable Transport  |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Policy   |
| <b>Please state which paragraph number(s) this representation relates to.</b>   |  |
| <b>Please state which Policy Number this representation relates to.</b>   | WS 9.2   |
| <b>Please state which Site ID/Reference this</b>  |  |



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| representation relates to.   |   |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |   |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Justified<br>Not Effective<br>Not Consistent with National Policy   |
| Please give details of why you consider the Local Plan is unsound. Please be   | Please refer to attachment<br>7.17. This Policy builds on the themes expressed above, with a focus on ensuring that new development facilitates sustainable modes of transport and travel. The Policy is weighted to ensuring that new developments incorporate measures to improve accessibility and permeability, with priority given to walking, cycling and public transport. Our Client has no objection to the principles of this Policy, and this is something which they themselves can deliver and commit to in the event that their land interests west of Sandy Lane in Irby were to come forward for development. |

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

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

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

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

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

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

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

## LPSD-1313

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| <b>Comment ID</b>   | LPSD-1313  |
| <b>Person ID</b>  | 1248438  |
| <b>Include files</b>  | <a href="#">LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf</a><br><a href="#">LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Country and Coastal Development Ltd  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Agent ID</b>   | 1248451  |
| <b>Agent Name</b>   | Mr<br>Steve<br>Grimster  |
| <b>Position</b>   | Director   |
| <b>Company / Organisation</b>   | Grimster Planning  |
| <b>Number</b>   | Policy WS 5  |
| <b>Title</b>  | Strategy for Green and Blue Infrastructure, Open Space, Biodiversity, and Landscape Protection   |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Policy   |
| <b>Please state which paragraph number(s) this representation relates to.</b>   |  |
| <b>Please state which Policy Number this representation relates to.</b>   | WS 5   |
| <b>Please state which Site ID/Reference this</b>  |  |

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| representation relates to.   |  |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |  |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Justified<br>Not Effective<br>Not Consistent with National Policy  |
| Please give details of why you consider the Local Plan is unsound. Please be   | please refer to attachment.<br>Section 15 of the NPPF recognises the importance of conserving and enhancing the natural environment. Local Plans are identified as having a role to play in managing new development to ensure that these sustainability objectives are met. 8.3. To this end, it is noted that the Council is committed to tackling issues relating to flood-risk and climate change, protecting and increasing the number of green and blue infrastructure networks and ensuring that development is sympathetic to the local character and special qualities of the Wirral, including the |

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| <b>as precise as possible.</b>  | <p>protection and enhancement of valued landscapes. These are all themes which our Client supports, as they are representative of long-term planning and sustainable development. 8.4. Clearly, in meeting these objectives, the Council will be faced with some challenging decisions, notably where to direct new development and on which sites. No doubt this has informed the Council's decision-making respect of its proposed housing allocations within the SD. However, there is a need to find a balance between environmental protection and meeting development needs; the Council's spatial strategy, directing new development to the urban conurbation and focusing development on brownfield land, offers the most environmental protection it could be argued. However, at the same time and for the reasons already set out in this Representation, it is our Client's position that this approach will not achieve the development needs of the Borough. As such, the Council needs to acknowledge that there will need to be the loss of some existing natural features to accommodate new development, with appropriate mitigation wherever possible; the SD fails to recognise this opportunity. 8.5. To this end, our Client supports the principle of the Council's green and blue infrastructure strategy. It is largely consistent with the NPPF and when implemented should deliver net gains. The protection and enhancement of natural environmental assets goes hand in hand with the green and blue infrastructure standards; our Client supports the aspiration to provide net gains in biodiversity and establish coherent ecological networks wherever possible.</p> |
| <b>omplies with the Duty to co-operate</b><br>*        Yes<br>*        No   | Yes  |
| <b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>   |  |
| <b>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.</b>  |  |
| <b>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.</b> |  |
| <b>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</b>                             |  |

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



| hearing session(s)  |  |
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| <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-1314

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| <b>Comment ID</b>   | LPSP-1314  |
| <b>Person ID</b>  | 1248438  |
| <b>Include files</b>  | <a href="#">LPSP-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf</a><br><a href="#">LPSP-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Country and Coastal Development Ltd  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Agent ID</b>   | 1248451  |
| <b>Agent Name</b>   | Mr<br>Steve<br>Grimster  |
| <b>Position</b>   | Director   |
| <b>Company / Organisation</b>   | Grimster Planning  |
| <b>Number</b>   | Policy WS 5.1  |
| <b>Title</b>  | Green and Blue Infrastructure Networks   |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Policy   |
| <b>Please state which paragraph number(s) this representation relates to.</b>   |  |
| <b>Please state which Policy Number this representation relates to.</b>   | WS 5.1   |
| <b>Please state which Site ID/Reference this</b>  |  |

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| representation relates to.   |   |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |   |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Justified<br>Not Effective<br>Not Consistent with National Policy   |
| Please give details of why you consider the Local Plan is unsound. Please be   | 8.7. Our Client supports the general themes of this Policy and what it seeks to achieve. 8.8. However, they are concerned at the wording of part 1 of the Policy and its very restrictive nature. As drafted, it effectively precludes the development of any greenfield land, the majority of which will have some ecological value, however minor. Exceptional circumstances are required to be demonstrated, which ones assumes is a very high bar at the Council's own judgement. To this end, the Policy is considered to be overly and unnecessarily restrictive; it should be amended by deleting reference to "...in exceptional circumstances and...." – this will provide flexibility, whilst still requiring "appropriate compensatory measures, mitigation or replacement in line with the relevant legislation." 8.9. Part B of the Policy refers to the appropriate green and blue infrastructure provision being provided elsewhere, in the event that on-site |

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| <b>as precise as possible.</b>   | provision is not possible. This policy flexibility reflects our Client's earlier concerns about the viability of higher-density schemes in the urban conurbations being capable of delivering the required levels of open space provision. If the Council's spatial strategy and distribution will lead to development which is unable to support policy compliant levels of provision, then that should be assessed and understood now in order that alternative sites can be considered (where policy compliant provision is possible). This is a key component of a high quality living environment, aligning with the wider Local Plan Vision and Strategic Objectives. |
| <b>omplies with the Duty to co-operate</b><br>* Yes<br>* No  | Yes   |
| <b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>  |   |
| <b>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.</b>   |   |
| <b>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.</b>        |   |
| <b>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.</b> |   |
| <b>Please set out the modification(s) you</b>  | Part 1 amend by deleting reference to "...in exceptional circumstances and...."   |

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**

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| <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-1315

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| <b>Comment ID</b>   | LPSD-1315  |
| <b>Person ID</b>  | 1248438  |
| <b>Include files</b>  | <a href="#">LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf</a><br><a href="#">LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Country and Coastal Development Ltd  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Agent ID</b>   | 1248451  |
| <b>Agent Name</b>   | Mr<br>Steve<br>Grimster  |
| <b>Position</b>   | Director   |
| <b>Company / Organisation</b>   | Grimster Planning  |
| <b>Number</b>   | Policy WS 5.1  |
| <b>Title</b>  | Green and Blue Infrastructure Networks   |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Policy   |
| <b>Please state which paragraph number(s) this representation relates to.</b>   |  |
| <b>Please state which Policy Number this representation relates to.</b>   | WS 5.1   |
| <b>Please state which Site ID/Reference this</b>  |  |

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| representation relates to.   |  |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |  |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Justified<br>Not Effective<br>Not Consistent with National Policy  |
| Please give details of why you consider the Local Plan is unsound. Please be   | Please refer to attachment<br>8.7. Our Client supports the general themes of this Policy and what it seeks to achieve. 8.8. However, they are concerned at the wording of part 1 of the Policy and its very restrictive nature. As drafted, it effectively precludes the development of any greenfield land, the majority of which will have some ecological value, however minor. Exceptional circumstances are required to be demonstrated, which ones assumes is a very high bar at the Council's own judgement. To this end, the Policy is considered to be overly and unnecessarily restrictive; it |



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| <b>as precise as possible.</b>   | should be amended by deleting reference to “...in exceptional circumstances and....” – this will provide flexibility, whilst still requiring “appropriate compensatory measures, mitigation or replacement in line with the relevant legislation.” 8.9. Part B of the Policy refers to the appropriate green and blue infrastructure provision being provided elsewhere, in the event that on-site provision is not possible. This policy flexibility reflects our Client's earlier concerns about the viability of higher-density schemes in the urban conurbations being capable of delivering the required levels of open space provision. If the Council's spatial strategy and distribution will lead to development which is unable to support policy compliant levels of provision, then that should be assessed and understood now in order that alternative sites can be considered (where policy compliant provision is possible). This is a key component of a high quality living environment, aligning with the wider Local Plan Vision and Strategic Objectives. |
| <b>omplies with the Duty to co-operate</b><br>* Yes<br>* No  | Yes  |
| <b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>  |  |
| <b>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.</b>   |  |
| <b>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.</b>        |  |
| <b>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.</b> |  |

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

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| <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-1316

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| <b>Comment ID</b>   | LPSPD-1316   |
| <b>Person ID</b>  | 1248438  |
| <b>Include files</b>  | <a href="#">LPSPD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf</a><br><a href="#">LPSPD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Country and Coastal Development Ltd  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Agent ID</b>   | 1248451  |
| <b>Agent Name</b>   | Mr<br>Steve<br>Grimster  |
| <b>Position</b>   | Director   |
| <b>Company / Organisation</b>   | Grimster Planning  |
| <b>Number</b>   | Policy WS 5.2  |
| <b>Title</b>  | Open Space Provision   |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Policy   |
| <b>Please state which paragraph number(s) this representation relates to.</b>   |  |
| <b>Please state which Policy Number this representation relates to.</b>   | WS 5.2   |
| <b>Please state which Site ID/Reference this</b>  |  |

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| <b>representation relates to.</b>   |   |
| <b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>  |   |
| <b>Legally compliant</b><br>* <b>Yes</b><br>* <b>No</b>   | Yes   |
| <b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>   |   |
| <b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>   |   |
| <b>Sound</b><br>* <b>Yes</b><br>* <b>No</b>   | No  |
| <b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>   |   |
| <b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b><br>* <b>Not Positively Prepared</b><br>* <b>Not Justified</b><br>* <b>Not Effective</b><br>* <b>Not Consistent with National Policy</b> | Not Justified<br>Not Effective<br>Not Consistent with National Policy   |
| <b>Please give details of why you consider the Local Plan is unsound. Please be</b>   | Please refer to attachment<br>This Policy provides flexibility between on-site and off-site provision (with the latter by way of financial contributions). The flexibility is the result of the Council's development and spatial strategy, which they are aware will rely on high-density schemes incapable of meeting full policy requirements on-site. That is not considered to be representative of positive planning. There can also be no certainty that all sites would be capable of meeting the requirements set out in Parts D (1-3) of the Policy. 8.11. Our Client recognises the importance of delivering |

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| <b>as precise as possible.</b>   | high-quality areas of open space as an integral part of a new residential development. It serves to deliver a sense of community, whilst delivering social, environmental and health and well-being benefits. To this end, it is considered that an “onsite” first approach should be applied to open space provision, and only in “exceptional circumstances” should an off-site contribution be deemed acceptable. |
| <b>omplies with the Duty to co-operate</b><br>* Yes<br>* No  | Yes  |
| <b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>  |  |
| <b>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.</b>   |  |
| <b>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.</b>        |  |
| <b>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.</b> |  |
| <b>Please set out the modification(s) you consider necessary</b>   | an “onsite” first approach should be applied to open space provision, and only in “exceptional circumstances” should an off-site contribution be deemed acceptable.  |

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),

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| <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-1317

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| <b>Comment ID</b>   | LPSD-1317  |
| <b>Person ID</b>  | 1248438  |
| <b>Include files</b>  | <a href="#">LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf</a><br><a href="#">LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Country and Coastal Development Ltd  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Agent ID</b>   | 1248451  |
| <b>Agent Name</b>   | Mr<br>Steve<br>Grimster  |
| <b>Position</b>   | Director   |
| <b>Company / Organisation</b>   | Grimster Planning  |
| <b>Number</b>   | Policy WS 5.8  |
| <b>Title</b>  | Landscape Character  |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Policy   |
| <b>Please state which paragraph number(s) this representation relates to.</b>   |  |
| <b>Please state which Policy Number this representation relates to.</b>   | WS 5.8   |
| <b>Please state which Site ID/Reference this</b>  |  |

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| representation relates to.   |  |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |  |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Justified<br>Not Effective<br>Not Consistent with National Policy  |
| Please give details of why you consider the Local Plan is unsound. Please be   | Please refer to attachment<br>Landscape Character 8.12. Our Client has previously submitted comments in response to a) the Wirral Landscape Sensitivity Assessment Addendum, and (b) the Wirral Environmental Sensitivity when published for consultation in 2020 2021. Copies of these can be found at Appendix 2 of this Representation. 8.13. Accordingly, whilst our Client has no objection to the principle of Policy WS5.8 and what it aims to achieve, it has been demonstrated that our Client's land interests west of Sandy Lane in Irby are capable of being developed within having |

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| <b>as precise as possible.</b>   | an inappropriate impact on the landscape features and visual appearance of the Central Wirral Sandstone Hills Local Landscape Designation (formerly part of the Dee Coast Area of Special Landscape Value). |
| <b>omplies with the Duty to co-operate</b><br>* Yes<br>* No  | Yes   |
| <b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>  |   |
| <b>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.</b>   |   |
| <b>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.</b>        |   |
| <b>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.</b> |   |
| <b>Please set out the modification(s) you consider necessary to make the Local</b>   |   |

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)

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| <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> |  |

LPSP-1318

|   |  |
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| <b>Comment ID</b>   | LPSP-1318  |
| <b>Person ID</b>  | 1248438  |
| <b>Include files</b>  | <a href="#">LPSP-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf</a><br><a href="#">LPSP-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Country and Coastal Development Ltd  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Agent ID</b>   | 1248451  |
| <b>Agent Name</b>   | Mr<br>Steve<br>Grimster  |
| <b>Position</b>   | Director   |
| <b>Company / Organisation</b>   | Grimster Planning  |
| <b>Number</b>   | Policy WD 1.1  |
| <b>Title</b>  | Landscaping proposals  |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Policy   |
| <b>Please state which paragraph number(s) this representation relates to.</b>   |  |
| <b>Please state which Policy Number this representation relates to.</b>   | WD 1.1   |
| <b>Please state which Site ID/Reference this</b>  |  |

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| representation relates to.   |  |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |  |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Justified<br>Not Effective<br>Not Consistent with National Policy  |
| Please give details of why you consider the Local Plan is unsound. Please be   | Please refer to attachment<br>Policy WD1.1 – Landscaping 8.14. Our Client has no objection to the principles of this Policy. The implementation of new soft landscaping as part of development proposals has an integral role to play, delivering environmental and health/well-being benefits. This is something which they can commit to and achieve in the event that their land interests to the west of Sandy Lane in Irby were to be developed |

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



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

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

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

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

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

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

LPSD-1319

|   |  |
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| <b>Comment ID</b>   | LPSD-1319  |
| <b>Person ID</b>  | 1248438  |
| <b>Include files</b>  | <a href="#">LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf</a><br><a href="#">LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Country and Coastal Development Ltd  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Agent ID</b>   | 1248451  |
| <b>Agent Name</b>   | Mr<br>Steve<br>Grimster  |
| <b>Position</b>   | Director   |
| <b>Company / Organisation</b>   | Grimster Planning  |
| <b>Number</b>   | Policy WD 1.2  |
| <b>Title</b>  | Trees  |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Policy   |
| <b>Please state which paragraph number(s) this representation relates to.</b>   |  |
| <b>Please state which Policy Number this representation relates to.</b>   | WD 1.2   |
| <b>Please state which Site ID/Reference this</b>  |  |

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| representation relates to.   |  |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |  |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Justified<br>Not Effective<br>Not Consistent with National Policy  |
| Please give details of why you consider the Local Plan is unsound. Please be   | please refer to attachment<br>Policy WD1.2 – Trees 8.15. This policy ties in directly with the above. Our Client has no objection to the protection of existing tree coverage where possible, and the provision of replacement tree planting as part of a new development. Indeed, these principles have been applied by our Client in the preparation of the illustrative masterplan for their land interests west of Sandy Lane in Irby, as shown in Appendix 1 of this Representation |

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

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

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

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

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

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

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| 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-1320

|   |  |
|---|--|
| <b>Comment ID</b>   | LPSPD-1320   |
| <b>Person ID</b>  | 1248438  |
| <b>Include files</b>  | <a href="#">LPSPD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf</a><br><a href="#">LPSPD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Country and Coastal Development Ltd  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Agent ID</b>   | 1248451  |
| <b>Agent Name</b>   | Mr<br>Steve<br>Grimster  |
| <b>Position</b>   | Director   |
| <b>Company / Organisation</b>   | Grimster Planning  |
| <b>Number</b>   | Policy WD 3  |
| <b>Title</b>  | Biodiversity and Geodiversity  |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Policy   |
| <b>Please state which paragraph number(s) this representation relates to.</b>   |  |
| <b>Please state which Policy Number this representation relates to.</b>   | WD 3   |
| <b>Please state which Site ID/Reference this</b>  |  |



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| representation relates to.   |  |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |  |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Justified<br>Not Effective<br>Not Consistent with National Policy  |
| Please give details of why you consider the Local Plan is unsound. Please be   | Please refer to attachment<br>Policy WD3 – Biodiversity and Geodiversity 8.16. As documented earlier within this Section, our Client recognises the importance of environmental protection. At the same time, there is a balance that has to be struck between environmental protection and meeting housing needs across the Wirral, rather than simply directing new development to what may be viewed as less sensitive locations in order to effectively provide a permanent level of protection to the environment. This appears to be the case in respect of the development and spatial strategy |

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| <b>as precise as possible.</b>   | advanced by the Council in the SD. 8.17. The development of greenfield land will inevitably cause some loss of habitat; however, so too may brownfield sites which involve the demolition of existing buildings. The development of greenfield land does not mean that new development cannot deliver a betterment over the existing position; the legislative and policy requirements to secure net gains in biodiversity now provides the necessary incentive (and control for Local Planning Authorities) to ensure that this is achieved and forms an integral component in the evolution/development of schemes. If it is not, then planning permission could well be withheld, as per Part D of the Policy. 8.18. In view of the Council's strategy focusing on the development of brownfield land in east and northeast Wirral, it is unclear how achievable net gains in biodiversity will be on such sites, particularly given the policy flexibility outlined earlier for open space provision to be delivered off-site by way of a financial contribution. Clarification is therefore required as to whether those net gains will be expected to be met off-site, and how these will be calculated, implemented (and at what stage in the development process) and monitored. |
| <b>omplies with the Duty to co-operate</b><br>* Yes<br>* No  | Yes  |
| <b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>  |  |
| <b>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.</b>   |  |
| <b>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.</b>        |  |
| <b>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.</b> |  |

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| <p><b>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.</b></p> | <p>Clarification is therefore required as to whether those net gains will be expected to be met off-site, and how these will be calculated, implemented (and at what stage in the development process) and monitored.</p> |
| <p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></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>   |

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| <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-1321

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| <b>Comment ID</b>   | LPSD-1321  |
| <b>Person ID</b>  | 1248438  |
| <b>Include files</b>  | <a href="#">LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf</a><br><a href="#">LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Country and Coastal Development Ltd  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Agent ID</b>   | 1248451  |
| <b>Agent Name</b>   | Mr<br>Steve<br>Grimster  |
| <b>Position</b>   | Director   |
| <b>Company / Organisation</b>   | Grimster Planning  |
| <b>Number</b>   | Policy WD 4  |
| <b>Title</b>  | Coastal Protection, Flood Risk, Sustainable Drainage & Natural Water Management  |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Policy   |
| <b>Please state which paragraph number(s) this representation relates to.</b>   |  |
| <b>Please state which Policy Number this representation relates to.</b>   | WD 4   |
| <b>Please state which Site ID/Reference this</b>  |  |

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| representation relates to.   |   |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |   |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Justified<br>Not Effective<br>Not Consistent with National Policy   |
| Please give details of why you consider the Local Plan is unsound. Please be   | Please refer to attachment<br>Flood risk and coastal change is a further environmental issue which has direct implications for Wirral given its locational characteristics. Accordingly, the Council should be satisfied that its proposed housing supply (including allocations) is capable of coming forward in area identified as being at a low risk of flooding, consistent with Part D of this Policy. 8.20. Our Client notes that the Council has undertaken a Sequential Test and Exception Test as part of the plan-making process. However, they do not concur that there are no reasonably available sites |

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| <p><b>as precise as possible.</b></p>  | <p>capable of development in areas at lower risk of flooding across the Wirral, as required by paragraph 162 of the NPPF. There are, delivery of which can be facilitated by way of a policy change (i.e released from the Green Belt). At the same time, this will facilitate a much more balanced approach to housing delivery across the Wirral, as advocated by our Client earlier in this Representation. 8.21. Our Client does not consider that the conclusions of the Exception Test are such that, in some cases, the wider sustainability benefits identified can only be met through the release of those sites identified by the Council. For example, the sustainability benefits of Site Ref.'s RES-SA4.6 and RES-SA5.3 could be applicable to other land parcels in the Wirral; accordingly, it does not necessitate building in Flood Zones 2 and 3 when land in Flood Zone 1 is reasonably available with a policy change. Site Ref. RES-SA4.6, with capacity for c. 150 dwellings, could remain available for employment or other non-residential uses given its location. Likewise, Site Ref. RES-SA5.3, with capacity for 100 dwellings, could be wholly allocated for employment use. 8.22. Such an approach is not considered to be consistent with national policy, given that paragraph 140 of the NPPF provides for an alteration to Green Belt boundaries in exceptional circumstances, details of which are set out in Section 6 of this Representation. This would allow for residential development to come forward in areas at a lower risk of flooding. This includes our Client's land interests west of Sandy Lane in Irby which lies wholly within Flood Zone 1. 8.23. In terms of actual physical drainage solutions, our Client has no objection to and supports the use of SuDS where these are proven to be achievable on a site</p> |
| <p><b>omplies with the Duty to co-operate</b><br/> * Yes<br/> * No</p>   | <p>Yes</p>   |
| <p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>   |  |
| <p><b>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.</b></p>  |  |
| <p><b>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.</b></p> |  |
| <p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying</b></p>  |  |

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| <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>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> |



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

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| <b>Comment ID</b>  | LPSD-1322  |
| <b>Person ID</b>   | 1248438  |
| <b>Include files</b>   | <a href="#">LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf</a><br><a href="#">LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>  | Country and Coastal Development Ltd  |
| <b>Position</b>  |  |
| <b>Company / Organisation</b>  |  |
| <b>Agent ID</b>  | 1248451  |
| <b>Agent Name</b>  | Mr<br>Steve<br>Grimster  |
| <b>Position</b>  | Director   |
| <b>Company / Organisation</b>  | Grimster Planning  |
| <b>Number</b>  | Policy WP 4.2  |
| <b>Title</b>   | Residential Sites  |
| <b>To which part of the Local Plan does this representation relate?</b>  | Site   |
| <ul style="list-style-type: none"> <li>* Paragraph(s)</li> <li>* Policy</li> <li>* Site</li> <li>* Policies Map</li> <li>* Sustainability Appraisal</li> <li>* Habitat Regulations Assessment</li> </ul> |  |
| <b>Please state which paragraph number(s) this representation relates to.</b>  |  |
| <b>Please state which Policy Number this representation relates to.</b>  |  |
| <b>Please state which Site ID/Reference this</b>   | RES-SA4.6  |

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| representation relates to.   |  |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |  |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Justified<br>Not Effective<br>Not Consistent with National Policy  |
| Please give details of why you consider the Local Plan is unsound. Please be   | Please refer attachment<br>Flood risk and coastal change is a further environmental issue which has direct implications for Wirral given its locational characteristics. Accordingly, the Council should be satisfied that its proposed housing supply (including allocations) is capable of coming forward in area identified as being at a low risk of flooding, consistent with Part D of this Policy. 8.20. Our Client notes that the Council has undertaken a Sequential Test and Exception Test as part of the plan-making process. However, they do not concur that there are no reasonably available sites |

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| <b>as precise as possible.</b>  | capable of development in areas at lower risk of flooding across the Wirral, as required by paragraph 162 of the NPPF. There are, delivery of which can be facilitated by way of a policy change (i.e released from the Green Belt). At the same time, this will facilitate a much more balanced approach to housing delivery across the Wirral, as advocated by our Client earlier in this Representation. 8.21. Our Client does not consider that the conclusions of the Exception Test are such that, in some cases, the wider sustainability benefits identified can only be met through the release of those sites identified by the Council. For example, the sustainability benefits of Site Ref.'s RES-SA4.6 and RES-SA5.3 could be applicable to other land parcels in the Wirral; accordingly, it does not necessitate building in Flood Zones 2 and 3 when land in Flood Zone 1 is reasonably available with a policy change. Site Ref. RES-SA4.6, with capacity for c. 150 dwellings, could remain available for employment or other non-residential uses given its location. Likewise, Site Ref. RES-SA5.3, with capacity for 100 dwellings, could be wholly allocated for employment use. 8.22. Such an approach is not considered to be consistent with national policy, given that paragraph 140 of the NPPF provides for an alteration to Green Belt boundaries in exceptional circumstances, details of which are set out in Section 6 of this Representation. This would allow for residential development to come forward in areas at a lower risk of flooding. This includes our Client's land interests west of Sandy Lane in Irby which lies wholly within Flood Zone 1. 8.23. In terms of actual physical drainage solutions, our Client has no objection to and supports the use of SuDS where these are proven to be achievable on a site |
| <b>omplies with the Duty to co-operate</b><br>* Yes<br>* No   | Yes   |
| <b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>   |   |
| <b>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.</b>  |   |
| <b>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.</b> |   |
| <b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying</b>  |   |

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| <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>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> |

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| <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-1323

|   |  |
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| <b>Comment ID</b>   | LPSD-1323  |
| <b>Person ID</b>  | 1248438  |
| <b>Include files</b>  | <a href="#">LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Form 2507_Redacted.pdf</a><br><a href="#">LPSD-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Country and Coastal Development Ltd  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Agent ID</b>   | 1248451  |
| <b>Agent Name</b>   | Mr<br>Steve<br>Grimster  |
| <b>Position</b>   | Director   |
| <b>Company / Organisation</b>   | Grimster Planning  |
| <b>Number</b>   | Policy WP 5.1  |
| <b>Title</b>  | Residential Sites  |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Site   |
| <b>Please state which paragraph number(s) this representation relates to.</b>   |  |
| <b>Please state which Policy Number this representation relates to.</b>   |  |
| <b>Please state which Site ID/Reference this</b>  | RES-SA5.3  |

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| representation relates to.   |   |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |   |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Justified<br>Not Effective<br>Not Consistent with National Policy   |
| Please give details of why you consider the Local Plan is unsound. Please be   | Please refer to attachment<br>Flood risk and coastal change is a further environmental issue which has direct implications for Wirral given its locational characteristics. Accordingly, the Council should be satisfied that its proposed housing supply (including allocations) is capable of coming forward in area identified as being at a low risk of flooding, consistent with Part D of this Policy. 8.20. Our Client notes that the Council has undertaken a Sequential Test and Exception Test as part of the plan-making process. However, they do not concur that there are no reasonably available sites |



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| <b>as precise as possible.</b>  | capable of development in areas at lower risk of flooding across the Wirral, as required by paragraph 162 of the NPPF. There are, delivery of which can be facilitated by way of a policy change (i.e released from the Green Belt). At the same time, this will facilitate a much more balanced approach to housing delivery across the Wirral, as advocated by our Client earlier in this Representation. 8.21. Our Client does not consider that the conclusions of the Exception Test are such that, in some cases, the wider sustainability benefits identified can only be met through the release of those sites identified by the Council. For example, the sustainability benefits of Site Ref.'s RES-SA4.6 and RES-SA5.3 could be applicable to other land parcels in the Wirral; accordingly, it does not necessitate building in Flood Zones 2 and 3 when land in Flood Zone 1 is reasonably available with a policy change. Site Ref. RES-SA4.6, with capacity for c. 150 dwellings, could remain available for employment or other non-residential uses given its location. Likewise, Site Ref. RES-SA5.3, with capacity for 100 dwellings, could be wholly allocated for employment use. 8.22. Such an approach is not considered to be consistent with national policy, given that paragraph 140 of the NPPF provides for an alteration to Green Belt boundaries in exceptional circumstances, details of which are set out in Section 6 of this Representation. This would allow for residential development to come forward in areas at a lower risk of flooding. This includes our Client's land interests west of Sandy Lane in Irby which lies wholly within Flood Zone 1. 8.23. In terms of actual physical drainage solutions, our Client has no objection to and supports the use of SuDS where these are proven to be achievable on a site |
| <b>omplies with the Duty to co-operate</b><br>* Yes<br>* No   | Yes   |
| <b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>   |   |
| <b>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.</b>  |   |
| <b>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.</b> |   |
| <b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying</b>  |   |

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| <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>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> |

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| <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-1324

|   |  |
|---|--|
| <b>Comment ID</b>   | LPSP-1324  |
| <b>Person ID</b>  | 1248438  |
| <b>Include files</b>  | <a href="#">LPSP-1267, 1271-1275, 1277, 1279-1286, 1288-1289, 1291-1295, 1297-1298, 1300-1324-EM-Grimster Attach 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Country and Coastal Development Ltd  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Agent ID</b>   | 1248451  |
| <b>Agent Name</b>   | Mr<br>Steve<br>Grimster  |
| <b>Position</b>   | Director   |
| <b>Company / Organisation</b>   | Grimster Planning  |
| <b>Number</b>   | Policy WP 7  |
| <b>Title</b>  | Policy for Irby, Thingwall, Pensby, Heswall and Gayton   |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Policy   |
| <b>Please state which paragraph number(s) this representation relates to.</b>   |  |
| <b>Please state which Policy Number this representation relates to.</b>   | WP 7   |
| <b>Please state which Site ID/Reference this representation relates to.</b>   |  |

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| <b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>  |  |
| <b>Legally compliant</b><br>* Yes<br>* No   | Yes  |
| <b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>   |  |
| <b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>   |  |
| <b>Sound</b><br>* Yes<br>* No   | No   |
| <b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>   |  |
| <b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b><br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Justified<br>Not Effective<br>Not Consistent with National Policy  |
| <b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>   | Please refer to attachment<br>Irby, Thingwall, Pensby, Heswall and Gayton – Settlement Area 7 9.1. As documented earlier in this Representation, and later in Section 11, our Client's land interests are located to the immediate west of Sandy Lane in the settlement of Irby. 9.2. Paragraph 5.57 of the SD recognises that there is a significant local centre in Irby which supports the needs of the local population and contribute to its overall sustainability. 9.3. On review of the priorities for this Settlement Area, it is noted that there is no mention of meeting housing needs. Instead, the focus is on enhancing the vitality and viability of Heswall Town Centre, and Irby Local Centre. There is also the ambition to address the local shortfall in amenity greenspace, allotments, playing pitches and outdoor sports provision. 9.4. Our Client has no objection to the priorities set out. However, they fail to see how any of these priorities can and will be met in the absence of any proposals for significant housing growth in the Settlement Area. Based on the Council's Key Diagram and Policy WP 7.2 (Residential Sites), the Settlement Area is estimated to |

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|   | <p>see in the region of 34 no. new dwellings up to 2037 (sites of 1-9 and 10+), equating to average of 2 dwellings per annum during the Plan period. Given that this will take the form of small, piecemeal developments, they will simply not be able to support the delivery of these priorities on viability grounds (and because they fall below many of the policy thresholds set out in the SD, including Policy WS5.2). This is a minimal amount of new housing in a Settlement Area of 28,500 people. 9.5. Accordingly, the reality is that the Settlement Area will experience very limited growth over the Plan period based on the current development and spatial strategy which the Council is advancing within the SD. This will not enable the priorities for the Settlement Area to be met. Instead, much larger scale growth is required around the Settlement Area; to this end, the release of our Client's land interests to the west of Sandy Lane in Irby, as documented in Section 11 of this Representation, would support and facilitate the realisation of some of these priorities.</p> |
| <p><b>omplies with the Duty to co-operate</b><br/> * Yes<br/> * No</p>  | Yes  |
| <p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>  |  |
| <p><b>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.</b></p>   |  |
| <p><b>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.</b></p>        |  |
| <p><b>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.</b></p> |  |

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| <p><b>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.</b></p> | <p>more housing allocations needed to support the objectives for Settlement Area 7</p> |
| <p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></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>                                |

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| <p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>  |  |
| <p><b>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).</b></p> <p>*     <b>Yes</b></p> <p>*     <b>No</b></p> |  |



LPSP-1326

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| <b>Comment ID</b>  | LPSP-1326   |
| <b>Person ID</b>   | 1323779   |
| <b>Include files</b>   | <a href="#">LPSP-1326-EM-Jones Form 2 of 6 2207_Redacted.pdf</a><br><a href="#">LPSP-470,1326,1327,1328,1329,1330-EM-Jones Attach 2207_Redacted.pdf</a> |
| <b>Consultee Name</b>  | Mr<br>Mathew<br>Tudor-Owen  |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  | Anwyl Construction Company Ltd  |
| <b>Agent ID</b>  | 1311725   |
| <b>Agent Name</b>  | Rachel<br>Jones   |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  |   |
| <b>Number</b>  | Policy WS 3.1   |
| <b>Title</b>   | Housing Design Standards  |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability<br>* Appraisal<br>* Habitat<br>* Regulations<br>* Assessment | Policy  |
| <b>Please state which paragraph number(s) this representation relates to.</b>  |   |
| <b>Please state which Policy Number this representation relates to.</b>  | WS 3.1  |
| <b>Please state which Site ID/Reference this</b>   |   |

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| representation relates to.   |   |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |   |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Consistent with National Policy                           |
| Please give details of why you consider the Local Plan is  | Please refer to attachment further justification for NDSS and |

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| <b>unsound. Please be as precise as possible.</b>  | <p>WBC's Strategic Housing Market Assessment provides limited information as to why it would be necessary for all new build dwellings to be accessible and adaptable in line with Part M4(2) of the Building Regulations or why it would be necessary for developments of 17 or more new build dwellings at least 6% will be 'wheelchair adaptable' in line with Part M4(3)(2)(a) of the Building Regulations.</p> <p>Overall, given the lack of evidence and consistency with national policy, this element of the policy is not sound in accordance with Paragraph 35 of the NPPF.</p> |
| <b>omplies with the Duty to co-operate</b><br>*      Yes<br>*      No  |  |
| <b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>  |  |
| <b>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.</b>   |  |
| <b>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.</b>        |  |
| <b>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.</b> |  |

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| <p><b>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.</b></p> | <p>Amendments are required to the assessment of NDSS in the evidence base in order for it to be consistent with the Technical Housing Standards – Nationally Described Space Standard (March 2015) (Department for Communities and Local Government). further justification for Accessibility and adaptability standards. The CIL and Viability Assessment should be updated to take account of costs so that viability is not overstated.</p> |
| <p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></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>  |

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| <p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>  | <p>It is necessary for Avison Young to attend and participate in the examination, on behalf of Anywl Construction Company Limited, in order to discuss the technical evidence and policy requirements</p> |
| <p><b>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).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p> | <p>Yes</p>  |

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| <b>Comment ID</b>  | LPSD-1327   |
| <b>Person ID</b>   | 1323779   |
| <b>Include files</b>   | <a href="#">LPSD-470,1326,1327,1328,1329,1330-EM-Jones Attach 2207_Redacted.pdf</a><br><a href="#">LPSD-1327-EM-Jones Form 3 of 6 2207_Redacted.pdf</a> |
| <b>Consultee Name</b>  | Mr<br>Mathew<br>Tudor-Owen  |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  | Anwyl Construction Company Ltd  |
| <b>Agent ID</b>  | 1311725   |
| <b>Agent Name</b>  | Rachel<br>Jones   |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  |   |
| <b>Number</b>  | Policy WS 3.2   |
| <b>Title</b>   | Housing Density   |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability<br>* Appraisal<br>* Habitat<br>* Regulations<br>* Assessment | Policy  |
| <b>Please state which paragraph number(s) this representation relates to.</b>  |   |
| <b>Please state which Policy Number this representation relates to.</b>  | WS 3.2  |
| <b>Please state which Site ID/Reference this</b>   |   |

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| representation relates to.   |   |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |   |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy |   |
| Please give details of why you consider the Local Plan is unsound. Please be   | Please refer to attachment<br>Overall, Anwyl Construction Company Limited have concerns in relation to draft Policy WS 3.2. In order achieve the proposed density at the site, a number of other policy requirements cannot be achieved and could also impact the viability of residential development at the site. |

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| as precise as possible.   |  |
| omplies with the Duty to co-operate<br>* Yes<br>* 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   |  |



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| <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> |   |
| <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>   | <p>It is necessary for Avison Young to attend and participate in the examination, on behalf of Anywl Construction Company Limited, in order to discuss the technical evidence and policy requirements</p> |

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| you consider this to be necessary:   |     |
| <p><b>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).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p> | Yes |

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| <b>Comment ID</b>  | LPSD-1328   |
| <b>Person ID</b>   | 1323779   |
| <b>Include files</b>   | <a href="#">LPSD-1328-EM-Jones Form 4 of 6 2207_Redacted.pdf</a><br><a href="#">LPSD-470,1326,1327,1328,1329,1330-EM-Jones Attach 2207_Redacted.pdf</a> |
| <b>Consultee Name</b>  | Mr<br>Mathew<br>Tudor-Owen  |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  | Anwyl Construction Company Ltd  |
| <b>Agent ID</b>  | 1311725   |
| <b>Agent Name</b>  | Rachel<br>Jones   |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  |   |
| <b>Number</b>  | Policy WS 3.3   |
| <b>Title</b>   | Affordable Housing Requirements   |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability<br>* Appraisal<br>* Habitat<br>* Regulations<br>* Assessment | Policy  |
| <b>Please state which paragraph number(s) this representation relates to.</b>  |   |
| <b>Please state which Policy Number this representation relates to.</b>  | WS 3.3  |
| <b>Please state which Site ID/Reference this</b>   |   |

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| representation relates to.   |   |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |   |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Positively Prepared<br>Not Justified<br>Not Effective<br>Not Consistent with National Policy  |
| Please give details of why you consider the Local Plan is unsound. Please be   | Please refer to attachment<br>Resolve 106's report picks up at Section 4, that the residential appraisals undertaken in the Council's CIL and Viability Assessment ('CILVA') by Aspinall Verdi (2022) incorrectly overstates the transfer values for Affordable Rent dwellings and applies a 80% open market value ('OMV'), this is normally expected to generate a value of circa 50% OMV. In consequence, the affordable housing revenues are overstated and as such the credibility of the findings of the CILVA are called into question. |

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| as precise as possible.   |   |
| omplies with the Duty to co-operate<br>* Yes<br>* 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   | 5.1 The required amendments to policy WS 3.3 would as outlined:<br>a) Ensure consistency with National Policy having regard to the contents of paragraph 65 NPPF;<br>b) Reflect the identified requirements for Affordable Rent dwellings in the SHMA21 and TA once allowance is made for the existing supply of Social Rent accommodation in Wirral; |

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| <p><b>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.</b></p> | <p>c) Align with the findings of the CILVA once the discrepancies in respect of transfer values for Affordable Rent dwellings have been rectified.</p> <p>5.2 In order to achieve this Part F of the policy text to WS 3.3 should be amended as follows:</p> <p>25% of the affordable housing provided shall comprise First Homes where this is required by national policy. <i>In Viability Zones 1 and 2 the remaining affordable housing will be for alternative affordable home ownership products. affordable rent and social rent in line with national policy and the needs identified in the latest Strategic Housing Market Assessment unless this significantly prejudices the provision of dwelling types and tenures required to meet the needs for specific groups. In Viability Zones 3 and 4 25% of the affordable housing provided shall comprise First Homes where this is required by national policy, 50% of the affordable housing should be provided for Affordable Rent, and the remaining affordable housing will be for alternative affordable home ownership products. Where relevant, affordable housing for rent should be designed to facilitate transfer to an appropriate Registered Social Landlord or equivalent affordable housing provider.</i></p> |
| <p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></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><b>If you wish to participate in the hearing session(s), please outline why</b></p>   | <p>It is necessary for Avison Young to attend and participate in the examination, on behalf of Anywl Construction Company Limited, in order to discuss the technical evidence and policy requirements</p>   |

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| you consider this to be necessary:   |            |
| <p><b>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).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p> | <p>Yes</p> |

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| <b>Comment ID</b>  | LPSD-1329   |
| <b>Person ID</b>   | 1323779   |
| <b>Include files</b>   | <a href="#">LPSD-470,1326,1327,1328,1329,1330-EM-Jones Attach 2207_Redacted.pdf</a><br><a href="#">LPSD-1329-EM-Jones Form 5 of 6 2207_Redacted.pdf</a> |
| <b>Consultee Name</b>  | Mr<br>Mathew<br>Tudor-Owen  |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  | Anwyl Construction Company Ltd  |
| <b>Agent ID</b>  | 1311725   |
| <b>Agent Name</b>  | Rachel<br>Jones   |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  |   |
| <b>Number</b>  | Policy WS 3.4   |
| <b>Title</b>   | Housing Mix   |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability<br>* Appraisal<br>* Habitat<br>* Regulations<br>* Assessment | Policy  |
| <b>Please state which paragraph number(s) this representation relates to.</b>  |   |
| <b>Please state which Policy Number this representation relates to.</b>  | WS 3.4  |
| <b>Please state which Site ID/Reference this</b>   |   |



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| representation relates to.   |  |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |  |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Effective  |
| Please give details of why you consider the Local Plan is unsound. Please be   | Please refer to attachment<br>Anwyl Construction Company Limited are concerned with the requirement to have 70% of market dwellings to be 3 or more bedrooms as it conflicts with draft Policy 3.2 which requires a minimum density of 50 dph on sites in transit areas. |

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| <b>as precise as possible.</b>   | Overall, Anwyl Construction Company Limited have concerns with draft Policy WS 3.4 in relation to the requirements of draft Policy 3.2 to achieve the proposed density at the site and achieving sufficient flexibility to balance all policy requirements.   |
| <b>omplies with the Duty to co-operate</b><br>* Yes<br>* No  |   |
| <b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>  |   |
| <b>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.</b>   |   |
| <b>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.</b>        |   |
| <b>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.</b> |   |
| <b>Please set out the modification(s) you consider necessary to make the Local</b>   | It is also important to attach flexibility to draft Policy 3.4 regarding housing mix in recognition of ensuring the scheme is viable and provides an appropriate housing mix for the area depending on market demand. There must be a robust and flexible mechanism whereby additional requirements can be relaxed if viability is threatened.<br>There should be reference to the relaxing of requirements on viability and deliverability grounds either in the policy or its sub-text to ensure the policy is effective. |

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| <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> |   |
| <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>   | <p>It is necessary for Avison Young to attend and participate in the examination, on behalf of Anywl Construction Company Limited, in order to discuss the technical evidence and policy requirements</p> |

| you consider this to be necessary:   |            |
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| <p><b>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).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p> | <p>Yes</p> |

LPSP-1330

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| <b>Comment ID</b>  | LPSP-1330   |
| <b>Person ID</b>   | 1323779   |
| <b>Include files</b>   | <a href="#">LPSP-1330-EM-Jones Form 6 of 6 2207_Redacted.pdf</a><br><a href="#">LPSP-470,1326,1327,1328,1329,1330-EM-Jones Attach 2207_Redacted.pdf</a> |
| <b>Consultee Name</b>  | Mr<br>Mathew<br>Tudor-Owen  |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  | Anwyl Construction Company Ltd  |
| <b>Agent ID</b>  | 1311725   |
| <b>Agent Name</b>  | Rachel<br>Jones   |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  |   |
| <b>Number</b>  | Policy WS 5.2   |
| <b>Title</b>   | Open Space Provision  |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability<br>* Appraisal<br>* Habitat<br>* Regulations<br>* Assessment | Policy  |
| <b>Please state which paragraph number(s) this representation relates to.</b>  |   |
| <b>Please state which Policy Number this representation relates to.</b>  | WS 5.2  |
| <b>Please state which Site ID/Reference this</b>   |   |

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| representation relates to.   |  |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |  |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Positively Prepared<br>Not Justified<br>Not Effective<br>Not Consistent with National Policy   |
| Please give details of why you consider the Local Plan is unsound. Please be   | Please refer to attachment<br>The Wirral Open Space Standards Paper (September 2021) provides an assessment of existing parks and gardens in Wirral, and with regards to Mayer Park (ID: 305), which is near to the site, this is assessed as having a high quality and value in Appendix one. The play area within Mayer Park (ID: 305.1) is also assessed in Appendix 1 to be of a high quality and value. It is understood from this report that distances to open space and children's play area is taken from recommendations from the Fields in Trust ('FIT') accessibility catchment recommendations. |

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| <p><b>as precise as possible.</b></p>   | <p>This report also references the existing standards as set out in Wirral UDP which sets out a 400m access standard to parks and gardens as well as provision for children and young people. The report references FIT document 'Beyond the Six Acre Standard' (2015) as providing the background to the distances and standards used. It is noted that the FIT document referenced is 2015, however there is a more up to date November 2020 version. As such, it is suggested that the Council review the updated FIT document and update their evidence accordingly.</p> <p>In any case, it is noted that the 2020 version correlates with the draft policy and recommends a walking distance of 400m to a LEAP and 720m to natural and semi-natural informal outdoor space.</p> |
| <p><b>omplies with the Duty to co-operate</b><br/> *      Yes<br/> *      No</p>  |  |
| <p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>  |  |
| <p><b>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.</b></p>   |  |
| <p><b>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.</b></p>        |  |
| <p><b>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.</b></p> |  |

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| <p><b>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.</b></p> | <p>Anwyl Construction Company Limited support the draft policy, however it is suggested the evidence is reviewed to refer to the latest FIT document in order to be considered sound in accordance with Paragraph 35 of the NPPF.</p> |
| <p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></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>   |



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| <p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>  | <p>It is necessary for Avison Young to attend and participate in the examination, on behalf of Anywl Construction Company Limited, in order to discuss the technical evidence and policy requirements</p> |
| <p><b>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).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p> | <p>Yes</p>  |

LPSP-1331

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| <b>Comment ID</b>  | LPSP-1331   |
| <b>Person ID</b>   | 1324090   |
| <b>Include files</b>   | <a href="#">LPSP-717,1331,1332,1333-EM-Baker Attach 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>  | Mr<br>Paul<br>Kenny   |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  | The KL Pension Fund   |
| <b>Agent ID</b>  | 1324089   |
| <b>Agent Name</b>  | Ms<br>Tillie<br>Baker   |
| <b>Position</b>  | Associate Planner   |
| <b>Company / Organisation</b>  | Ruth Jackson Planning Limited   |
| <b>Number</b>  | Policy WP 3.4   |
| <b>Title</b>   | Employment Sites  |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability<br>* Appraisal<br>* Habitat<br>* Regulations<br>* Assessment | Policy  |
| <b>Please state which paragraph number(s) this representation relates to.</b>  |   |
| <b>Please state which Policy Number this representation relates to.</b>  | WP 3.4  |
| <b>Please state which Site ID/Reference this</b>   |   |

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| representation relates to.   |   |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |   |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Effective<br>Not Consistent with National Policy  |
| Please give details of why you consider the Local Plan is unsound. Please be   | The wording of Policy WP 3.4 is unclear with respect to allowable uses, as the table refers to B2 and B8 uses only, whereas the policy text includes reference to 'main employment uses'.<br>Policy WP 3.4 is more restrictive than the employment policies in the adopted UDP. In addition, the Council's own evidence base confirms that the site has viability constraints to delivery. As the site has remained vacant since at least the year 2000, it is unlikely that a more restrictive policy allocation will encourage development to come forward at the site, particularly in the context of acknowledged viability challenges. |

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| <p><b>as precise as possible.</b></p>  | <p>Policy WP 3.4 is more restrictive with respect to allowable uses than Policy WS 4.2 (which applies to the North Cheshire Trading Estate). Policy WS 4.2 allows for change of use to non-employment uses where robust marketing and economic evidence is provided in support of an application. The same flexibility should apply to Policy WP 3.4. The wording of Policy 3.4 should be amended as per the changes set out in Table 4.</p> <p>The inconsistency between Policy WS 4.2 and Policy WP 3.4 could create an incentive to redevelop existing sites in the Estate for non-employment use in favour of developing a vacant site. The proposed amended wording of Policy 3.4 (Table 4) will remove this inconsistency.</p> <p>The definitions of 'main employment uses' and 'wider employment generating uses' should be clarified to support the interpretation of Policies WS 4.2 and WP 3.4, in accordance with the proposed amended wording set out in Table 5.</p> <p>The policies map appears to show the site as a separate allocation to the North Cheshire Trading Estate, which should be corrected.</p> <p>The site should be included within the North Cheshire Trading Estate allocation. In addition, the plan is not consistent with national policy because:</p> <p>The restrictive wording of Policy WP3.4 is inconsistent with paragraph 82 of the NPPF. The policy is not sufficiently flexible to enable a rapid response to changes in economic circumstances, particularly in the event of an economic downturn.</p> <p>The definition of 'wider employment generating uses' is inconsistent with national policy with respect to town centres.</p> |
| <p><b>omplies with the Duty to co-operate</b><br/> *        Yes<br/> *        No</p>   |   |
| <p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>   |   |
| <p><b>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.</b></p>  |   |
| <p><b>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.</b></p> |   |
| <p><b>If you wish to make a separate representation, relating to legal compliance,</b></p>   |   |

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| <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>To make the plan sound, Policy WP 3.4 should be amended as follows (deletions shown in strikethrough and additions shown in blue):</p> <p><b>Policy WP 3.4 Employment Sites</b></p> <p>K. The following sites shown on the Policies Map are allocated for new employment development. The specific requirements are set out below.</p> <p>ID: EMP-SA3.1</p> <p>Name: Land west of Prenton Way, North Cheshire Trading Estate, Prenton</p> <p>Area (ha): 0.58 ha</p> <p>Uses: Main employment uses and wider employment</p> <p><b>Site EMP-SA3.1 Land West of Prenton Way North Cheshire Trading Estate, Prenton (0.58 ha)</b></p> <p>L. The site is allocated for main employment uses <i>and wider employment generating uses. General industrial (B2) and storage and distribution (B8) uses will be particularly encouraged.</i> <del>offices/light industry, research and development and general industry, storage and distribution (B2, B8).</del> Development of this site should:</p> <ol style="list-style-type: none"> <li>1 Provide flexible business premises that can be adapted in response to changing circumstances; and</li> <li>2 Provide a landscape buffer with the M53.</li> </ol> <p>M. <i>Other uses will only be acceptable where:</i></p> <ul style="list-style-type: none"> <li>• <i>It has been demonstrated with information regarding the marketing of the site and other market signals that there is no reasonable prospect of the site being used for the allocated use/s; and</i></li> <li>• <i>The proposal will be compatible with the character of the surrounding area and would not restrict the operation or function of employment uses at the North Cheshire Trading Estate.</i></li> </ul> |
| <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</p>   | <p>Yes, I wish to participate in hearing session(s)</p>   |

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| <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>As these representations refer to a single site allocation, I would like to ensure that the comments are not overlooked in the wider discussion of employment policy.</p> |
| <p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p> | <p>Yes</p>   |

LPSP-1332

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| <b>Comment ID</b>   | LPSP-1332   |
| <b>Person ID</b>  | 1324090   |
| <b>Include files</b>  | <a href="#">LPSP-717,1331,1332,1333-EM-Baker Attach 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Mr<br>Paul<br>Kenny   |
| <b>Position</b>   |   |
| <b>Company / Organisation</b>   | The KL Pension Fund   |
| <b>Agent ID</b>   | 1324089   |
| <b>Agent Name</b>   | Ms<br>Tillie<br>Baker   |
| <b>Position</b>   | Associate Planner   |
| <b>Company / Organisation</b>   | Ruth Jackson Planning Limited   |
| <b>Number</b>   | Policy WP 3.4   |
| <b>Title</b>  | Employment Sites  |
| <b>To which part of the Local Plan does this representation relate?</b>   | Policies Map  |
| <ul style="list-style-type: none"> <li>* Paragraph(s)</li> <li>* Policy</li> <li>* Site</li> <li>* Policies Map</li> <li>* Sustainability</li> <li>* Appraisal</li> <li>* Habitat</li> <li>* Regulations</li> <li>* Assessment</li> </ul> |   |
| <b>Please state which paragraph number(s) this representation relates to.</b>   |   |
| <b>Please state which Policy Number this representation relates to.</b>   |   |
| <b>Please state which Site ID/Reference this</b>  |   |

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| <b>representation relates to.</b>   |   |
| <b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>  | BIRKENHEAD - NORTH EAST (2 of 4)  |
| <b>Legally compliant</b><br>* Yes<br>* No   |   |
| <b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>   |   |
| <b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>   |   |
| <b>Sound</b><br>* Yes<br>* No   | No  |
| <b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>   |   |
| <b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b><br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Effective<br>Not Consistent with National Policy  |
| <b>Please give details of why you consider the Local Plan is unsound. Please be</b>   | Please refer to attachment<br>The draft policies map indicates that the site is subject to a separate allocation to that of the wider North Cheshire Trading Estate. Clicking on the site on the interactive map brings up Policy WP 3.4 layer only, suggesting that it is not included within the North Cheshire Trading Estate in policy terms. It is unclear whether this is deliberate or whether both layers should apply to the site. |



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| as precise as possible.   |  |
| omplies with the Duty to co-operate<br>* Yes<br>* 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   | The draft policies map should be amended to clearly include the site within the wider allocation for the North Cheshire Trading Estate. This will ensure that the provisions of Policy WS 4.2 will apply to the site once developed. |

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)

As these representations refer to a single site allocation, I would like to ensure that the comments are not overlooked in the wider discussion of employment policy.

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| you consider this to be necessary:   |     |
| <p><b>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).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p> | Yes |

LPSP-1333

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| <b>Comment ID</b>  | LPSP-1333   |
| <b>Person ID</b>   | 1324090   |
| <b>Include files</b>   | <a href="#">LPSP-717,1331,1332,1333-EM-Baker Attach 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>  | Mr<br>Paul<br>Kenny   |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  | The KL Pension Fund   |
| <b>Agent ID</b>  | 1324089   |
| <b>Agent Name</b>  | Ms<br>Tillie<br>Baker   |
| <b>Position</b>  | Associate Planner   |
| <b>Company / Organisation</b>  | Ruth Jackson Planning Limited   |
| <b>Number</b>  | Policy WS 4   |
| <b>Title</b>   | Strategy for Economy and Employment                                       |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability<br>* Appraisal<br>* Habitat<br>* Regulations<br>* Assessment | Policy  |
| <b>Please state which paragraph number(s) this representation relates to.</b>  |   |
| <b>Please state which Policy Number this representation relates to.</b>  | WS 4  |
| <b>Please state which Site ID/Reference this</b>   |   |

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| representation relates to.   |   |
| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |   |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Effective<br>Not Consistent with National Policy  |
| Please give details of why you consider the Local Plan is unsound. Please be   | Please refer to attachment.<br>The definition wording also compromises the soundness of the plan by making employment policies difficult to interpret. The Council should consider removing any reference to Class E leisure uses from the definition wording and revising the wording for clarity. Suggested alternative wording is provided in the following section. |

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| as precise as possible.   |  |
| omplies with the Duty to co-operate<br>* Yes<br>* 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   | The definitions of 'main employment uses' and 'wider employment generating uses' should be clarified to support the interpretation of Policies WS 4.2 and WP 3.4, in accordance with the proposed amended wording set out in Table 5.<br><b>Main employment uses</b> |

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| <p><b>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.</b></p> | <p>Main employment uses are those uses normally found in industrial estates or business parks, requiring dedicated land or buildings. For the purpose of applying Policy WS4, they are defined as:</p> <ul style="list-style-type: none"> <li>• Class B2 General Industrial;</li> <li>• Class B8 Storage and Distribution;</li> <li>• Class E(g)(i) Offices to carry out any operational or administrative functions;</li> <li>• Class E(g)(ii) Research and development of products or processes;</li> <li>• Class E(g)(iii) Industrial processes.</li> </ul> <p><b>Wider employment generating uses</b></p> <p>Wider employment-generating uses are those uses generating permanent on-site employment. For the purpose of applying Policy WS 4, they are defined as:</p> <ul style="list-style-type: none"> <li>• Training facilities (Class F1(a));</li> <li>• Class E(f) Creche, day nursery or day centre (not including a residential use);</li> <li>• Class E(e) Provision of medical or health services (except the use of premises attached to the residence of the consultant or practitioner);</li> <li>• Sui generis uses including the hiring, selling and/or display of motor vehicles; taxi businesses; car repair garages; taxi firms; home recycling centres;</li> <li>• Ancillary retail uses within Designated Employment Areas, including factory shops and trade counters, subject to access and parking considerations being satisfactorily addressed.</li> </ul> |
| <p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></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><b>If you wish to participate in the hearing session(s), please outline why</b></p>   | <p>As these representations refer to a single site allocation, I would like to ensure that the comments are not overlooked in the wider discussion of employment policy.</p>   |

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| you consider this to be necessary:   |     |
| <p><b>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).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p> | Yes |



LPSP-1334

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| <b>Comment ID</b>  | LPSP-1334   |
| <b>Person ID</b>   | 1323714   |
| <b>Include files</b>   | <a href="#">LPSP-722,1334,1335,1336,1337,1343,1345,1346,1347-EM-Pierce Attach 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>  | Sam<br>Pierce   |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  | Persimmon Homes   |
| <b>Agent ID</b>  |   |
| <b>Agent Name</b>  |   |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  |   |
| <b>Number</b>  | Policy WS 3.1   |
| <b>Title</b>   | Housing Design Standards  |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability<br>* Appraisal<br>* Habitat<br>* Regulations<br>* Assessment | Policy  |
| <b>Please state which paragraph number(s) this representation relates to.</b>  |   |
| <b>Please state which Policy Number this representation relates to.</b>  | WS 3.1  |
| <b>Please state which Site ID/Reference this representation relates to.</b>  |   |

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| <b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>  |  |
| <b>Legally compliant</b><br>* Yes<br>* No   |  |
| <b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>   |  |
| <b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>   |  |
| <b>Sound</b><br>* Yes<br>* No   | No   |
| <b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>   |  |
| <b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b><br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Justified<br>Not Consistent with National Policy   |
| <b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>   | <p>Please refer to attachment</p> <p>Persimmon support the aspiration for high quality design and development under the draft policy, however raises concern that the nationally described space standard will not be achievable / compatible with other policies in the plan, including those which propose housing developments achieving minimum densities.</p> <p>In relation to criterion 3 of the policy, in our view, the requirement for strategic housing sites to be 'zero carbon ready by design' is not justified within the Council's evidence base on viability or consistent with national policy and will have significant implications on the ability to meet its identified housing requirements across the Plan period. The assumption that larger development sites are capable of achieving such targets is overly simplistic and does not take account of the significant infrastructure costs and other considerations.</p> <p>refer also consortium rep LPSD 408</p> |

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| <p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>  |  |
| <p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>  |  |
| <p><b>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.</b></p>   |  |
| <p><b>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.</b></p>        |  |
| <p><b>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.</b></p> |  |
| <p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>  | <p>Re Criteria 3. The Policy should at the very least include reference to an 'unless practicable or viable' clause. There is currently no evidence to support the introduction of this requirement, or that it should solely be applied to strategic housing sites (i.e. allocations). Instead, Persimmon requests that the Policy be expressed more as an ambition that such sites should aspire to achieve, rather than as a mandatory requirement.</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:

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| <p><b>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).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p> | <p>Yes</p> |
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LPSP-1335

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| <b>Comment ID</b>  | LPSP-1335   |
| <b>Person ID</b>   | 1323714   |
| <b>Include files</b>   | <a href="#">LPSP-722,1334,1335,1336,1337,1343,1345,1346,1347-EM-Pierce Attach 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>  | Sam<br>Pierce   |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  | Persimmon Homes   |
| <b>Agent ID</b>  |   |
| <b>Agent Name</b>  |   |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  |   |
| <b>Number</b>  | Policy WS 3.2   |
| <b>Title</b>   | Housing Density   |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability<br>* Appraisal<br>* Habitat<br>* Regulations<br>* Assessment | Policy  |
| <b>Please state which paragraph number(s) this representation relates to.</b>  |   |
| <b>Please state which Policy Number this representation relates to.</b>  | WS 3.2  |
| <b>Please state which Site ID/Reference this representation relates to.</b>  |   |

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| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |   |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* 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<br>As covered in more detail in the representations prepared by Lichfields on behalf of the Housing Consortium, (refer LPSD 408) Persimmon objects to Policy WS 3.2 due to the significant conflicts highlighted between achieving these housing densities and the housing needs identified in the 2021 Strategic Housing Market Assessment. |

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| <p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>  |  |
| <p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>  |  |
| <p><b>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.</b></p>   |  |
| <p><b>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.</b></p>        |  |
| <p><b>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.</b></p> |  |
| <p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></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:

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| <p><b>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).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p> | <p>Yes</p> |
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LPSP-1336

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|---|---|
| <b>Comment ID</b>   | LPSP-1336   |
| <b>Person ID</b>  | 1323714   |
| <b>Include files</b>  | <a href="#">LPSP-722,1334,1335,1336,1337,1343,1345,1346,1347-EM-Pierce Attach 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Sam<br>Pierce   |
| <b>Position</b>   |   |
| <b>Company / Organisation</b>   | Persimmon Homes   |
| <b>Agent ID</b>   |   |
| <b>Agent Name</b>   |   |
| <b>Position</b>   |   |
| <b>Company / Organisation</b>   |   |
| <b>Number</b>   | Policy WS 3.3   |
| <b>Title</b>  | Affordable Housing Requirements   |
| <b>To which part of the Local Plan does this representation relate?</b>   | Policy  |
| <ul style="list-style-type: none"> <li>* Paragraph(s)</li> <li>* Policy</li> <li>* Site</li> <li>* Policies Map</li> <li>* Sustainability</li> <li>* Appraisal</li> <li>* Habitat</li> <li>* Regulations</li> <li>* Assessment</li> </ul> |   |
| <b>Please state which paragraph number(s) this representation relates to.</b>   |   |
| <b>Please state which Policy Number this representation relates to.</b>   | WS 3.3  |
| <b>Please state which Site ID/Reference this representation relates to.</b>   |   |

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| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |   |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* 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<br>The provision of affordable housing is considered in detail in the representations prepared on behalf of The Development Consortium in Wirral. As an allocated site, Persimmon can confirm the policy requirements for affordable housing provision can be achieved on land at the Former Croda site. |

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| <p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>  |            |
| <p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>  |            |
| <p><b>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.</b></p>   |            |
| <p><b>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.</b></p>        |            |
| <p><b>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.</b></p> |            |
| <p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>  | <p>N/A</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:

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| <p><b>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).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p> | <p>Yes</p> |
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## LPSD-1337

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| <b>Comment ID</b>  | LPSD-1337   |
| <b>Person ID</b>   | 1323714   |
| <b>Include files</b>   | <a href="#">LPSD-722,1334,1335,1336,1337,1343,1345,1346,1347-EM-Pierce Attach 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>  | Sam<br>Pierce   |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  | Persimmon Homes   |
| <b>Agent ID</b>  |   |
| <b>Agent Name</b>  |   |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  |   |
| <b>Number</b>  | Policy WS 3.4   |
| <b>Title</b>   | Housing Mix   |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability<br>* Appraisal<br>* Habitat<br>* Regulations<br>* Assessment | Policy  |
| <b>Please state which paragraph number(s) this representation relates to.</b>  |   |
| <b>Please state which Policy Number this representation relates to.</b>  | WS 3.4  |
| <b>Please state which Site ID/Reference this representation relates to.</b>  |   |



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| <b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>  |   |
| <b>Legally compliant</b><br>* Yes<br>* No   |   |
| <b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>   |   |
| <b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>   |   |
| <b>Sound</b><br>* Yes<br>* No   | No  |
| <b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>   |   |
| <b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b><br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Justified   |
| <b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>   | <p>Please refer to attachment and LPSD 408 Lichfield's representations on behalf of the Development Consortium highlight significant concerns over the misalignment between the housing mix policies contained within Policy WS 3.4 and the reality of the housing mix that will be delivered from the supply.</p> <p>Notwithstanding, the intention Policy WS3.4, to ensure the mix of new property types delivered contributes to addressing identified needs, is supported.</p> <p>Persimmon support the flexibility built into the draft policy which should preclude the rigid approach to considering housing mix within schemes as there must be an acknowledgement of wider pressures or influences in bringing potential schemes forward.</p> <p>The requirement for larger (3-bed+), aspirational housing beyond the identified Regeneration Areas is supported and can be achieved on the Former Croda site.</p> |

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| <p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>  |  |
| <p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>  |  |
| <p><b>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.</b></p>   |  |
| <p><b>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.</b></p>        |  |
| <p><b>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.</b></p> |  |
| <p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>  | <p>However, neither the policy nor justification text acknowledge the underlying evidence base which should be explicitly referred to and subsequently updated on an annual basis through the plan period in order to remain effective and relative to market changes.</p> <p>In order to correctly address the needs of the Borough, it is vital documents such as the SHMA is updated every year. The market changes very quickly, therefore, it is necessary the policy has flexibility that will allow to adjust to the changing needs.</p> <p>There are also site-specific evidence, conditions and factors (such as scale, location, character, density, abnormals etc) which would render the requirements inappropriate and undeliverable in some instances. Whilst dwelling mix policies are often led by the evidence from the latest SHMA, in Persimmon's experience they tend to underplay these other important considerations.</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:

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| <p><b>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).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p> | <p>Yes</p> |
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| <b>Comment ID</b>   | LPSD-1338  |
| <b>Person ID</b>  | 1277283  |
| <b>Include files</b>  | <a href="#">LPSD-754, 938,1187-1193, 1196, 1200-1202, 1338-1342, 1348-1360, 1365-1370, 1372, 1374-1375, 1377-1378, 1384-1386 &amp; 1422-1424-EM-Harding Attach 2207_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Mr<br>Ross<br>Harding  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Agent ID</b>   |  |
| <b>Agent Name</b>   |  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Number</b>   | Part 2   |
| <b>Title</b>  | The Places and Our Vision  |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Paragraph(s)   |
| <b>Please state which paragraph number(s) this representation relates to.</b>   | Fig 2.6 and associated paras   |
| <b>Please state which Policy Number this representation relates to.</b>   |  |
| <b>Please state which Site ID/Reference this representation relates to.</b>   |  |

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| <p><b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b></p>  |  |
| <p><b>Legally compliant</b><br/> *        Yes<br/> *        No</p>   |  |
| <p><b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b></p>   |  |
| <p><b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b></p>   |  |
| <p><b>Sound</b><br/> *        Yes<br/> *        No</p>   | Yes  |
| <p><b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b></p>   | Please refer to attachment<br>the relationship between Sites of Biological Importance and Local Wildlife Sites should be set out in this section<br>no definition of SBI in glossary |
| <p><b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b><br/> *        Not Positively Prepared<br/> *        Not Justified<br/> *        Not Effective<br/> *        Not Consistent with National Policy</p> |  |
| <p><b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b></p>   |  |

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| <p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>  |   |
| <p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>  |   |
| <p><b>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.</b></p>   |   |
| <p><b>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.</b></p>        |   |
| <p><b>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.</b></p> |   |
| <p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>  | <p>the relationship between Sites of Biological Importance and Local Wildlife Sites should be set out in this section and SBI defined in glossary</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**

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|---|--|
| <b>Comment ID</b>   | LPSD-1339  |
| <b>Person ID</b>  | 1277283  |
| <b>Include files</b>  | <a href="#">LPSD-754, 938,1187-1193, 1196, 1200-1202, 1338-1342, 1348-1360, 1365-1370, 1372, 1374-1375, 1377-1378, 1384-1386 &amp; 1422-1424-EM-Harding Attach 2207_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Mr<br>Ross<br>Harding  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Agent ID</b>   |  |
| <b>Agent Name</b>   |  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Number</b>   | Part 2   |
| <b>Title</b>  | The Places and Our Vision  |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Paragraph(s)   |
| <b>Please state which paragraph number(s) this representation relates to.</b>   | para 2.39 Strategic Objectives   |
| <b>Please state which Policy Number this representation relates to.</b>   |  |
| <b>Please state which Site ID/Reference this representation relates to.</b>   |  |

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| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |                            |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Effective              |
| Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.   | Please refer to attachment |

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| <p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>  |   |
| <p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>  |   |
| <p><b>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.</b></p>   |   |
| <p><b>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.</b></p>        |   |
| <p><b>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.</b></p> |   |
| <p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>  | <p>We recommend the following specific changes to improve the effectiveness of the objectiveness: "SO5 - Protect <u>and enhance</u> the connectivity, quality and accessibility of urban and rural green Strategic space, and multifunctional green and blue infrastructure. Protect and enhance nature by ensuring development</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:

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| <p><b>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).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p> |  |
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LPSP-1340

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| <b>Comment ID</b>   | LPSP-1340  |
| <b>Person ID</b>  | 1277283  |
| <b>Include files</b>  | <a href="#">LPSP-754, 938,1187-1193, 1196, 1200-1202, 1338-1342, 1348-1360, 1365-1370, 1372, 1374-1375, 1377-1378, 1384-1386 &amp; 1422-1424-EM-Harding Attach 2207_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Mr<br>Ross<br>Harding  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Agent ID</b>   |  |
| <b>Agent Name</b>   |  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Number</b>   | Policy WS 1.3  |
| <b>Title</b>  | Infrastructure   |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Policy   |
| <b>Please state which paragraph number(s) this representation relates to.</b>   |  |
| <b>Please state which Policy Number this representation relates to.</b>   | WS 1.3   |
| <b>Please state which Site ID/Reference this representation relates to.</b>   |  |

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| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |  |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* No   | Yes  |
| Please give details of why you consider the Local Plan is sound. Please be as precise as possible.   | Please refer to attachment, supports reference to various roles of green and blue infrastructure |
| If you consider that the Local Plan is not sound, please indicate the reason(s) why:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy |  |
| Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.   |  |



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| <p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>  |  |
| <p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>  |  |
| <p><b>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.</b></p>   |  |
| <p><b>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.</b></p>        |  |
| <p><b>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.</b></p> |  |
| <p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></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-1341

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| <b>Comment ID</b>   | LPSD-1341  |
| <b>Person ID</b>  | 1277283  |
| <b>Include files</b>  | <a href="#">LPSD-754, 938,1187-1193, 1196, 1200-1202, 1338-1342, 1348-1360, 1365-1370, 1372, 1374-1375, 1377-1378, 1384-1386 &amp; 1422-1424-EM-Harding Attach 2207_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Mr<br>Ross<br>Harding  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Agent ID</b>   |  |
| <b>Agent Name</b>   |  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Number</b>   | Policy RA 5  |
| <b>Title</b>  | Hind Street and St Werburgh's Regeneration Area  |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Site   |
| <b>Please state which paragraph number(s) this representation relates to.</b>   |  |
| <b>Please state which Policy Number this representation relates to.</b>   |  |
| <b>Please state which Site ID/Reference this representation relates to.</b>   | MPA-RA5.1  |

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| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |  |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Justified<br>Not Effective   |
| Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.   | Please refer to attachment, large area of Open Mosaic Priority Habitat |

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| <p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>  |  |
| <p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>  |  |
| <p><b>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.</b></p>   |  |
| <p><b>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.</b></p>        |  |
| <p><b>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.</b></p> |  |
| <p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>  | <p>apply "Any part of the allocation site found to meet Cheshire LWS criteria will be designated as a LWS, enhanced and retained (with an adequate buffer) within the allocation."</p> |

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

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

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

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

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

\*      **Yes**  
\*      **No**



|   |  |
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| <b>Comment ID</b>   | LPSD-1342  |
| <b>Person ID</b>  | 1277283  |
| <b>Include files</b>  | <a href="#">LPSD-754, 938,1187-1193, 1196, 1200-1202, 1338-1342, 1348-1360, 1365-1370, 1372, 1374-1375, 1377-1378, 1384-1386 &amp; 1422-1424-EM-Harding Attach 2207_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Mr<br>Ross<br>Harding  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Agent ID</b>   |  |
| <b>Agent Name</b>   |  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Number</b>   | Policy WS 5  |
| <b>Title</b>  | Strategy for Green and Blue Infrastructure, Open Space, Biodiversity, and Landscape Protection   |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Paragraph(s)   |
| <b>Please state which paragraph number(s) this representation relates to.</b>   | 3.124  |
| <b>Please state which Policy Number this representation relates to.</b>   |  |
| <b>Please state which Site ID/Reference this representation relates to.</b>   |  |

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| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |  |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy |  |
| Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.   |  |

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| <p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>  |   |
| <p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>  |   |
| <p><b>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.</b></p>   |   |
| <p><b>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.</b></p>        | <p>Comment. Biodiversity Action Plan (BAP) priority habitats are referenced in this paragraph. We advise "BAP priority habitats" be defined in the glossary and a reference/link provided to the exhaustive list of Wirral/LCR BAP priority habitats to ensure the policy is effective.</p> |
| <p><b>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.</b></p> |   |
| <p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>  | <p>We advise "BAP priority habitats" be defined in the glossary and a reference/link provided to the exhaustive list of Wirral/LCR BAP priority habitats to ensure the policy is effective.</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-1343

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| <b>Comment ID</b>  | LPSP-1343   |
| <b>Person ID</b>   | 1323714   |
| <b>Include files</b>   | <a href="#">LPSP-722,1334,1335,1336,1337,1343,1345,1346,1347-EM-Pierce Attach 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>  | Sam<br>Pierce   |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  | Persimmon Homes   |
| <b>Agent ID</b>  |   |
| <b>Agent Name</b>  |   |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  |   |
| <b>Number</b>  | Policy WS 3.5   |
| <b>Title</b>   | Self-Build and Custom Build Housing   |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability<br>* Appraisal<br>* Habitat<br>* Regulations<br>* Assessment | Policy  |
| <b>Please state which paragraph number(s) this representation relates to.</b>  |   |
| <b>Please state which Policy Number this representation relates to.</b>  | WS 3.5  |
| <b>Please state which Site ID/Reference this representation relates to.</b>  |   |

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| <b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>  |   |
| <b>Legally compliant</b><br>* Yes<br>* No   |   |
| <b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>   |   |
| <b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>   |   |
| <b>Sound</b><br>* Yes<br>* No   | No  |
| <b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>   |   |
| <b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b><br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Justified<br>Not Effective<br>Not Consistent with National Policy   |
| <b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>   | <p>Please refer to attachment</p> <p>Whilst we support the Council seeking to facilitate more opportunities to accommodate self-build and custom housebuilding, we do not agree that the draft policy does this and instead could impede housing delivery with uncertainty, lack of clarity and onerous burdens being placed on the development industry.</p> <p>There is also an absence of evidence to support a requirement for self-build properties on larger sites over 50 units and more specifically within Bromborough. We also question whether a prospective plot purchaser would actively seek a self-build plot on a large residential estate or would more likely seek out such opportunities on smaller more bespoke plots.</p> <p>We must therefore object to the draft policy and consider that the policy is neither justified, effective or consistent with national policy.</p> |

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|  | Notwithstanding the overarching concerns we have to the policy, there are some real and significant practical issues in delivering upon the policy for developers of larger and strategic sites.  |
| <b>omplies with the Duty to co-operate</b><br>*        Yes<br>*        No  |   |
| <b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>  |   |
| <b>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.</b>   |   |
| <b>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.</b>        |   |
| <b>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.</b> |   |
| <b>Please set out the modification(s) you consider necessary to make the Local</b>   | <p>In our view the Council should have developed a policy which made exceptions for brownfield sites and housing allocations to accommodate self-build and custom housebuilding which would expand the land opportunities to the sector to accommodate specified needs.</p> <p>Therefore, Persimmon considers that maintaining flexibility within the current Policy wording is essential, particularly for housing allocations which should be exempt.</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.

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><b>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).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p> | <p>Yes</p> |

LPSP-1344

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|--|---|
| <b>Comment ID</b>  | LPSP-1344   |
| <b>Person ID</b>   | 1323714   |
| <b>Include files</b>   | <a href="#">LPSP-722,1334,1335,1336,1337,1343,1345,1346,1347-EM-Pierce Attach 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>  | Sam<br>Pierce   |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  | Persimmon Homes   |
| <b>Agent ID</b>  |   |
| <b>Agent Name</b>  |   |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  |   |
| <b>Number</b>  | Policy WS 7.2   |
| <b>Title</b>   | Privacy and Amenity   |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability<br>* Appraisal<br>* Habitat<br>* Regulations<br>* Assessment | Policy  |
| <b>Please state which paragraph number(s) this representation relates to.</b>  |   |
| <b>Please state which Policy Number this representation relates to.</b>  | WS 7.2  |
| <b>Please state which Site ID/Reference this representation relates to.</b>  |   |

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| <p><b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b></p>  |  |
| <p><b>Legally compliant</b><br/> *        Yes<br/> *        No</p>   |  |
| <p><b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b></p>   |  |
| <p><b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b></p>   |  |
| <p><b>Sound</b><br/> *        Yes<br/> *        No</p>   | Yes  |
| <p><b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b></p>   | <p>Please refer to attachment</p> <p>Persimmon support the provisions of Policy WS 7.2 which aren't considered overly prescriptive, and also agree that other policies of the Plan will ensure that a high standard of amenity for existing and future occupiers is secured. The housing allocation has been appropriately master planned to deliver on this policy requirement.</p> |
| <p><b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b><br/> *        Not Positively Prepared<br/> *        Not Justified<br/> *        Not Effective<br/> *        Not Consistent with National Policy</p> |  |
| <p><b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b></p>   |  |

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| <p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>  |            |
| <p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>  |            |
| <p><b>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.</b></p>   |            |
| <p><b>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.</b></p>        |            |
| <p><b>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.</b></p> |            |
| <p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>  | <p>N/A</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:

|  |            |
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| <p><b>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).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p> | <p>Yes</p> |
|--|------------|

LPSP-1345

|   |   |
|---|---|
| <b>Comment ID</b>   | LPSP-1345   |
| <b>Person ID</b>  | 1323714   |
| <b>Include files</b>  | <a href="#">LPSP-722,1334,1335,1336,1337,1343,1345,1346,1347-EM-Pierce Attach 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Sam<br>Pierce   |
| <b>Position</b>   |   |
| <b>Company / Organisation</b>   | Persimmon Homes   |
| <b>Agent ID</b>   |   |
| <b>Agent Name</b>   |   |
| <b>Position</b>   |   |
| <b>Company / Organisation</b>   |   |
| <b>Number</b>   | Policy WS 7.3   |
| <b>Title</b>  | Agent of Change   |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Policy  |
| <b>Please state which paragraph number(s) this representation relates to.</b>   |   |
| <b>Please state which Policy Number this representation relates to.</b>   | WS 7.3  |
| <b>Please state which Site ID/Reference this representation relates to.</b>   |   |



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| <b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>  |  |
| <b>Legally compliant</b><br>*        Yes<br>*        No   |  |
| <b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>   |  |
| <b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>   |  |
| <b>Sound</b><br>*        Yes<br>*        No   | Yes  |
| <b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>   | Please refer to attachment<br>As a matter of planning principle and in accordance with the NPPF, Persimmon support the provisions of Policy WS 7.3.<br>By virtue of the Former Croda site's allocation, which is adjacent to existing employment areas, it is concluded that the principle of residential use is compatible in this location.<br>The masterplan for the allocation demonstrates how appropriate mitigation measures (i.e. noise) can be achieved. This includes the proposal for a 10m wide acoustic barrier consisting of a 4 meter high bund with a 2 m high acoustic fence on top. At an overall height of 6m such mitigation is considered more than acceptable to resolve and planning risk on the agent of change principle. |
| <b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b><br>*        Not Positively Prepared<br>*        Not Justified<br>*        Not Effective<br>*        Not Consistent with National Policy |  |
| <b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>   |  |

|   |  |
|---|--|
| <p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>  |  |
| <p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>  |  |
| <p><b>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.</b></p>   |  |
| <p><b>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.</b></p>        |  |
| <p><b>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.</b></p> |  |
| <p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></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:

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| <p><b>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).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p> | <p>Yes</p> |
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LPSP-1346

|  |   |
|--|---|
| <b>Comment ID</b>  | LPSP-1346   |
| <b>Person ID</b>   | 1323714   |
| <b>Include files</b>   | <a href="#">LPSP-722,1334,1335,1336,1337,1343,1345,1346,1347-EM-Pierce Attach 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>  | Sam<br>Pierce   |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  | Persimmon Homes   |
| <b>Agent ID</b>  |   |
| <b>Agent Name</b>  |   |
| <b>Position</b>  |   |
| <b>Company / Organisation</b>  |   |
| <b>Number</b>  | Policy WS 7.4   |
| <b>Title</b>   | Parking   |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability<br>* Appraisal<br>* Habitat<br>* Regulations<br>* Assessment | Policy  |
| <b>Please state which paragraph number(s) this representation relates to.</b>  |   |
| <b>Please state which Policy Number this representation relates to.</b>  | WS 7.4  |
| <b>Please state which Site ID/Reference this representation relates to.</b>  |   |

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| <p><b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b></p>  |  |
| <p><b>Legally compliant</b><br/> *        Yes<br/> *        No</p>   |  |
| <p><b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b></p>   |  |
| <p><b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b></p>   |  |
| <p><b>Sound</b><br/> *        Yes<br/> *        No</p>   | Yes  |
| <p><b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b></p>   | <p>please refer to attachment</p> <p>Persimmon raise no further comments on the parking standards set out in Policy WS 7.4 and welcome the flexible approach under policy wording to take account of site sustainability credentials.</p> <p>This flexibility should be applied to the Former Croda site allocation given its accessible location.</p> |
| <p><b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b><br/> *        Not Positively Prepared<br/> *        Not Justified<br/> *        Not Effective<br/> *        Not Consistent with National Policy</p> |  |
| <p><b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b></p>   |  |

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| <p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>  |  |
| <p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>  |  |
| <p><b>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.</b></p>   |  |
| <p><b>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.</b></p>        |  |
| <p><b>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.</b></p> |  |
| <p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></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:



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| <p><b>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).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p> | <p>Yes</p> |
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LPSP-1347

|   |   |
|---|---|
| <b>Comment ID</b>   | LPSP-1347   |
| <b>Person ID</b>  | 1323714   |
| <b>Include files</b>  | <a href="#">LPSP-722,1334,1335,1336,1337,1343,1345,1346,1347-EM-Pierce Attach 2507_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Sam<br>Pierce   |
| <b>Position</b>   |   |
| <b>Company / Organisation</b>   | Persimmon Homes   |
| <b>Agent ID</b>   |   |
| <b>Agent Name</b>   |   |
| <b>Position</b>   |   |
| <b>Company / Organisation</b>   |   |
| <b>Number</b>   | Policy WP 4   |
| <b>Title</b>  | Policy for Bebington, Bromborough and Eastham   |
| <b>To which part of the Local Plan does this representation relate?</b>   | Policy  |
| <ul style="list-style-type: none"> <li>* Paragraph(s)</li> <li>* Policy</li> <li>* Site</li> <li>* Policies Map</li> <li>* Sustainability</li> <li>* Appraisal</li> <li>* Habitat</li> <li>* Regulations</li> <li>* Assessment</li> </ul> |   |
| <b>Please state which paragraph number(s) this representation relates to.</b>   |   |
| <b>Please state which Policy Number this representation relates to.</b>   | WP 4  |
| <b>Please state which Site ID/Reference this representation relates to.</b>   |   |

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| <b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>  |  |
| <b>Legally compliant</b><br>*        Yes<br>*        No   |  |
| <b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>   |  |
| <b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>   |  |
| <b>Sound</b><br>*        Yes<br>*        No   | Yes  |
| <b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>   | <p>please refer to attachment</p> <p>Persimmon support the draft justification text for Settlement Area 4 (within which the residential allocation at the Former Croda site is located within) and its specific focus on promoting the delivery of development which integrates appropriate design solutions, responds to its local context and realises benefits from its delivery.</p> <p>Under Policy WP 4.1, the Bromborough Pool Conservation Area is identified and lists out key design criteria for new development proposals to consider.</p> <p>Such policy direction has been central to the evolution of the scheme for the site with masterplan principles responding positively as a matter of course to the general requirements of the draft policy. The Council can therefore be confident that the proposed allocation of land at the Former Croda site can capably and positively respond to the emerging content of planning policy on design matters:</p> |
| <b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b><br>*        Not Positively Prepared<br>*        Not Justified<br>*        Not Effective<br>*        Not Consistent with National Policy |  |
| <b>Please give details of why you consider the Local Plan is unsound. Please be</b>   |  |

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| as precise as possible.   |  |
| omplies with the Duty to co-operate<br>* Yes<br>* 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><b>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).</b></p> <p>*     <b>Yes</b></p> <p>*     <b>No</b></p> | <p>Yes</p> |

## LPSD-1348

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| <b>Comment ID</b>   | LPSD-1348  |
| <b>Person ID</b>  | 1277283  |
| <b>Include files</b>  | <a href="#">LPSD-754, 938,1187-1193, 1196, 1200-1202, 1338-1342, 1348-1360, 1365-1370, 1372, 1374-1375, 1377-1378, 1384-1386 &amp; 1422-1424-EM-Harding Attach 2207_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Mr<br>Ross<br>Harding  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Agent ID</b>   |  |
| <b>Agent Name</b>   |  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Number</b>   | Policy WS 5  |
| <b>Title</b>  | Strategy for Green and Blue Infrastructure, Open Space, Biodiversity, and Landscape Protection   |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Paragraph(s)   |
| <b>Please state which paragraph number(s) this representation relates to.</b>   | 3.126  |
| <b>Please state which Policy Number this representation relates to.</b>   |  |
| <b>Please state which Site ID/Reference this representation relates to.</b>   |  |

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| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |  |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Effective  |
| Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.   | Please refer to attachment, clarity regarding additionality in Biodiversity Net Gain |



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| <p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>  |   |
| <p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>  |   |
| <p><b>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.</b></p>   |   |
| <p><b>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.</b></p>        |   |
| <p><b>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.</b></p> |   |
| <p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>  | <p>Developers and landowners 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 Local Nature Recovery Strategies and Nature Recovery Networks with partners. These will identify the strategic locations and priorities for off-site Biodiversity Net Gain provision (where on-site provision is not possible) and build upon the work already undertaken to identify networks and improvement areas. In the interim, prior to the requirements of the Environment Act being in place, net gains in biodiversity will still be sought <u>required</u> under the NPPF, and Policy WS 5 identifies priority areas for improvement.</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**

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| <b>Comment ID</b>   | LPSD-1349  |
| <b>Person ID</b>  | 1277283  |
| <b>Include files</b>  | <a href="#">LPSD-754, 938,1187-1193, 1196, 1200-1202, 1338-1342, 1348-1360, 1365-1370, 1372, 1374-1375, 1377-1378, 1384-1386 &amp; 1422-1424-EM-Harding Attach 2207_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Mr<br>Ross<br>Harding  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Agent ID</b>   |  |
| <b>Agent Name</b>   |  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Number</b>   | Policy WS 5.1  |
| <b>Title</b>  | Green and Blue Infrastructure Networks   |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Policy   |
| <b>Please state which paragraph number(s) this representation relates to.</b>   |  |
| <b>Please state which Policy Number this representation relates to.</b>   | WS 5.1   |
| <b>Please state which Site ID/Reference this representation relates to.</b>   |  |

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| Please state which Policies Map (Inset Map number(s)) this representation relates to.  |    |
| Legally compliant<br>* Yes<br>* 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<br>* Yes<br>* 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:<br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy |    |
| Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.   |    |

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| <p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>  |   |
| <p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>  |   |
| <p><b>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.</b></p>   |   |
| <p><b>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.</b></p>        | <p>CWT supports the reference to Natural England's Green Infrastructure Principles and the forthcoming GI Standards Framework in Para 3.134 and advise it is also referenced in this section.</p> |
| <p><b>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.</b></p> |   |
| <p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>  | <p>reference to Natural England's Green Infrastructure Principles and the forthcoming GI Standards Framework in Para 3.134 and advise it is also referenced in this section.</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-1350

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| <b>Comment ID</b>   | LPSD-1350  |
| <b>Person ID</b>  | 1277283  |
| <b>Include files</b>  | <a href="#">LPSD-754, 938,1187-1193, 1196, 1200-1202, 1338-1342, 1348-1360, 1365-1370, 1372, 1374-1375, 1377-1378, 1384-1386 &amp; 1422-1424-EM-Harding Attach 2207_Redacted.pdf</a> |
| <b>Consultee Name</b>   | Mr<br>Ross<br>Harding  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Agent ID</b>   |  |
| <b>Agent Name</b>   |  |
| <b>Position</b>   |  |
| <b>Company / Organisation</b>   |  |
| <b>Number</b>   | Policy WS 5  |
| <b>Title</b>  | Strategy for Green and Blue Infrastructure, Open Space, Biodiversity, and Landscape Protection   |
| <b>To which part of the Local Plan does this representation relate?</b><br>* Paragraph(s)<br>* Policy<br>* Site<br>* Policies Map<br>* Sustainability Appraisal<br>* Habitat Regulations Assessment | Paragraph(s)   |
| <b>Please state which paragraph number(s) this representation relates to.</b>   | WS 5 para 3.127  |
| <b>Please state which Policy Number this representation relates to.</b>   |  |
| <b>Please state which Site ID/Reference this representation relates to.</b>   |  |

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| <b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>  |  |
| <b>Legally compliant</b><br>* Yes<br>* No   |  |
| <b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>   |  |
| <b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>   |  |
| <b>Sound</b><br>* Yes<br>* No   | No   |
| <b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>   |  |
| <b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b><br>* Not Positively Prepared<br>* Not Justified<br>* Not Effective<br>* Not Consistent with National Policy | Not Effective  |
| <b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>   | <p>Please refer to attachment</p> <p>CWT supports and commends the Council on requiring a 20% biodiversity net gain proposed on Council owned sites.</p> <p>However, we do advise that this increased BNG requirement is applied to all (BNG applicable) development across Wirral. Kent Local Nature Partnership were recently funded to undertake a strategic level viability findings<sup>4</sup>. The assessment for 15% and 20% BNG requirements and have published a report into their assessment concluded that a shift from 10% to 15% or 20% BNG will not materially affect viability in the majority of instances when delivered onsite or offsite. It also found that the largest costs in most cases is to achieve the mandatory, minimum 10% BNG. The increase to 15% or 20% BNG in most cases costs much less and is generally negligible.</p> |

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| <p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>  |   |
| <p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>  |   |
| <p><b>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.</b></p>   |   |
| <p><b>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.</b></p>        |   |
| <p><b>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.</b></p> |   |
| <p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>  | <p>increased BNG requirement of 20% is applied to all (BNG applicable) development across Wirral.</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**