

LPSP-151

Comment ID	LPSP-151
Person ID	1243420
Include files	LPSP-150,151,155-EM-Jones Attach1 0807_Redacted.pdf LPSP-151-EM-Jones F2 of 3 0807_Redacted.pdf
Consultee Name	Alan Jones
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 5.3
Title	Outdoor Sports Provision
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	WS 5.3
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>Paragraph: 3.1 Policy GI 2.1 Indoor and Built Facilities Strategy: February 2021</p> <p>It is based on a Consultant's Report which is not sound as it is not consistent with National Policy.</p> <p>It is not positively prepared because it makes no recommendation for much-needed enhancement of facilities.</p> <p>The National Planning Policy Framework (NPPF) requires planning policies which are based on robust and up-to-date assessment of the needs for sports and recreation facilities. However, 'Part 3: 'Needs Assessment Findings' Section 3.1 does not refer to the needs of each sport but is just a general assessment of existing facilities. Hence sports which do not have a facility at present have not been considered. Most of these sports will have a need for a facility which is not being addressed. They will therefore continue to be deprived until 2037 at least.</p>

	<p>Informal sports such as skateboarding should have been included. Facilities for skateboarding are needed to discourage their use in public places, although they are seen by some as a means of transport. There are some dedicated skateboard facilities in Wirral. Skateboarding should be encouraged because it develops balance and agility skills providing a foundation for other sports such as skiing.</p> <p>Paragraph: Skiing:-</p> <p>This just states how the facility is currently being used and does not even mention that it is about 50 years old and out-of-date. It makes no reference to the needs of the sport, which have developed dramatically since it was built, and it became evident that it did not satisfy the needs of the sport within the first year of operation when it could not cope with the demand. The Leisure Centre itself appears to do nothing to promote the ski slope these days, but leaves everything to the Club, including maintenance. It used to run courses for the public and a Saturday morning session for juniors of various standards. It should be coordinating with schools and youth clubs to promote the sport to younger people.</p> <p>The consultants should have referred to the Governing Bodies of Snow-sports about the current needs of the sport, which cover more than just Alpine skiing, and they should have been made aware that the local Clubs have been campaigning for an extended facility for over 30 years. They should also have highlighted the fact that the Oval slope was the only snow-sport facility on Merseyside and that Merseyside was the largest conurbation outside London without an adequate snow-sport facility.</p>
<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in</p>	

<p>relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>In order to make the plan 'Sound', it will be necessary to engage new consultants to reassess the <u>needs</u> of <u>all</u> sports in consultation with the Governing Bodies of each sport. A firm of Sports Consultants would be more appropriate than a firm of Management Consultants.</p> <p>The Local Plan should not be held up whilst this is done. It should just report that further consultation on the needs of sports is taking place and that it will be published at a later date.</p> <p>As a suitable consultant, I would suggest David Francis: https://www.linkedin.com/in/david-francis-97434126/?originalSubdomain=ec. Whilst he is now based in Ecuador, his operation is worldwide and his relevant background experience is unique. He has been involved with a wide range of sports and played a significant role in the Sports Council in his early years. He later served as Chief Executive of the English Ski Council (ESC, now Snowsport England, the Governing Body of Snow-sports) in which he played a major part during its foundation. He has thus been involved with the development of artificial ski slopes since their beginning. It is probable that he visited the Oval during his time with the ESC and it has changed little since then.</p> <p>NPPF advises local planning authorities to work proactively and positively with promoters, delivery partners and statutory bodies to plan for required facilities. This is essential with respect to snow-sports as the capital cost is beyond the resources of most local authorities these days. A plan for extension of the ski slope at The Oval was refused planning permission and, in any case, fell short of what was required because of limitation of space on the site. Numerous other sites were considered, but there are few natural hills in Wirral and access, conservation and environmental issues could not be overcome. The only 'brown field' site of sufficient size in Wirral appears to be Wirral Waters. The Council therefore needs to open discussions with Peel Holdings about what might be possible. Hopefully, Peel Holdings will be sympathetic as their plans include leisure facilities and links to Bidston Moss, which is managed by the Forestry Commission. It is also essential that the Governing Bodies of Snow-sports are involved in planning, along with representatives of the local snow-sport community, most of whom are not members of a club.</p> <p>A detailed proposal for a state-of-the-art facility to replace the Oval slope will be submitted as a separate document, in pursuance of WS 5.3, 'D New Snow-sport facility Wirral.docx'. This would be a national asset and therefore a tourist attraction. It is based on a facility in Copenhagen, Denmark which provides a major ski slope on the roof of a large building, rather than a hill. See: https://www.copenhill.dk/en.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? * No, I do not wish to participate in</p>	<p>No, I do not wish to participate in hearing session(s)</p>

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

Comment ID	LPSD-152
Person ID	1312315
Include files	LPSD-152-153,156-Lewis-13.05_Redacted.pdf.pdf
Consultee Name	Mr Richard Lewis
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	
Title	The Strategic Objectives of the Local Plan
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	The Strategic Objectives of the Local Plan
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
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Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer to attachment The essence of a strategic objective is that it must be measurable in some way. You can use either numbers or milestone achievements to achieve this. These are the only ways through which you will be able to discern that an objective has been achieved. Most of the strategic objectives enumerated in the Local Plan are not objectives at all, rather generalised aims. This state of affairs probably suits those of a political persuasion because it means they cannot be easily pinned down for failure to deliver Objective 1 This passes muster, it states that you are committing that the Wirral will be “carbon neutral by 2041”. Objective 2 There is nothing here to enable anybody to discern whether or not it has been achieved.

	<p>Objective 3 I'm afraid that the business end of this objective does not measure up "local travel is largely fossil fuel free by 2030". What does it mean by "largely"? This needs quantifying, and you also need to ensure that there exists a regime to measure it properly.</p> <p>Objective 4 There is no suggestion here about any measure that will evidence achievement or otherwise.</p> <p>Objectives 5-12 Ditto</p>
<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
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<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	

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Consultee Name	Mr Richard Lewis
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Part 2
Title	The Places and Our Vision
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	Figure 2.4 Key Statistics – Population
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
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Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>There are some serious inconsistencies in these statistics, which, when identified by the Inspector, will expose the absurdities of the scale of creating new dwellings Housing number inaccurate</p> <p>What this means is that the segment of the population that is aged less than 65 will decline from 254,000 to 240,000, or 5.5% in the period in question. It stands to reason that the number of wage earners in this segment will also decline by about 5.5%.</p> <p>Why then is the plan identifying the need for 49 hectares of land to be devoted to commercial development and therefore job creation? Plainly there is no need for this, as there will be less jobs in 2037 than there are now, according to these projections. Equally it means that there is no need at all to build additional dwellings for this segment of the population.</p>

	<p>The other alternative suggestion is that these expected population dynamics are entirely wrong, and will appear so to the inspector. Perhaps it can be explained from where all these additional retirees are coming? You would expect the retired population to remain pretty stable over time, but to expect an additional 21,600 retired people by 2037 is frankly ridiculous. It can only mean that the death rate of our senior citizens will drop prodigiously or that there will be a significant ingress of outsiders in this age group.</p> <p>You need to deal with this significant anomaly before the inspector gets to see it. If the council goes ahead with its plan to build 13,000+ new dwellings, precious few of them will find buyers or rental occupiers. 13,000 is an absurdly high number whichever way you look at it.</p>
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
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<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>No, I do not wish to participate in hearing session(s)</p>

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Comment ID	LPSD-154
Person ID	1323312
Include files	
Consultee Name	Ms Amy Cullen
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 10.6
Title	Open Space
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 10.6
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
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If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	I am very disappointed and shocked by the lack of protected green spaces in Greasby, Moreton & Upton. None of the parks are protected (Coronation Park, Lingham Park and Upton Park). I would of thought that ALL of the parks would be protected based on criteria that you have set yourself! Instead there only 5 protected open spaces....most of which cannot offer any recreational use. Although there are no forecasted plans to build on these areas from your plan, you are suggesting that there may be future developments on them as they are not protected. Please protect our parks!

<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
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<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
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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 you consider this to be necessary:

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

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Consultee Name	Alan Jones
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 5.3
Title	Outdoor Sports Provision
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	WS 5.3 Section 3.3 FPM/Section 10 Ski/GI 2.2
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

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Legally compliant * Yes * No	
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Sound * Yes * No	No
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Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>It is based on a Consultant's Report which is not sound as it is not consistent with National Policy. It should be headed 'Indoor and Built Facilities Needs Assessment; January 2021'.</p> <p>It is not positively prepared because it makes no recommendation for much-needed enhancement of facilities.</p> <p>The National Planning Policy Framework (NPPF) requires planning policies which are based on robust and up-to-date assessment of the needs for sports and recreation facilities. Whilst Section 1.3 claims that the Report follows this requirement, in respect of skiing at least, it completely fails to do so. Cycling is mentioned in this section but there is no specific Section for cycling in the document. This could be of significance to skiing as cycle tracks are used for roller skiing, which is the main training activity for cross country (Nordic) skiers in the absence of snow. Roller skiing competitions have been held in Birkenhead park, although this is not an entirely satisfactory venue. The nearest good centre for roller skiing is at UCLAN, Preston.</p>

All snow-sports should have been covered, not just Alpine skiing. To comply with Policy WS 5.3 vastly better snow-sport facilities are needed to provide for a growing number of participants. The developers in the best position to assist are Peel Holdings.

Section 3.3 Facilities Planning Model

So far as I know, the Facilities Planning Model (FPM) has never been applied to snow-sports. I conducted a very limited survey on the usage of snows-sport centres which was published by Snowsport England in 2004, but the consultants for the 2010 SSE Strategy declined to undertake any more extensive survey to assess the needs of the sport.

Section 10: Ski

Snowsport England, the governing body of snow-sports in England does not appear to have been consulted, although the most appropriate organisation to advise on the needs of the sport. The representation on GI 2.1 shows that the Consultants have failed to identify a strategy to assess the needs of snow-sports so this report (GI 2.2) inevitably fails to meet its objectives.

10.1: Supply

Simply stating that there is one nursery slope fails to show that it nowhere near adequate to provide the needs of the sport. It was found to be inadequate during its first year of operation. There is no mention of the fact that it is about 50 years old and completely out-of-date. It is unattractive to most of its potential customers (who are not beginners) as it does not meet the basic expectations of most snow-sport participants today. Snow-sports have developed significantly since it was built but the facility has never been developed to keep pace. There are now other snow-sport disciplines which a 'good' facility should provide for.

Its quality rating should therefore be 'Poor'.

The Club is very restricted on what tuition it can give to more advanced skiers, with just a nursery slope.

The consultants should have been aware that the local Clubs have been campaigning for an extended facility for over 30 years. They should also have highlighted the fact that the Oval slope was the only snow-sport facility on Merseyside and that Merseyside was the largest conurbation outside London without an adequate snow-sport facility.

10.2: Demand

Only a very small fraction of snow-sport participants is in membership of clubs. Most participate through package tour operators. Hence, the Oval Ski Club is not in a position to estimate the demand. As there are no other snow-sport facilities on Merseyside, the demand comes from much further afield than just Wirral. It certainly used to be the case that there were customers coming from much further away than 30 minutes.

In its first year it could not cope with the demand, but it has since become underused because it does not offer what most snow-sport participants from Wirral want, which is substantially more than just a nursery slope. The slope is also underutilised because the management now leaves everything to the Club on a voluntary basis. Originally, the management offered courses (mainly for beginners) for the public and general practice time for the more experienced. It also ran courses for schools during the day and, on Saturday mornings, it offered training sessions for children at various standards. The Clubs just looked after the interest of their own Members one evening each week.

Probably many more local snow-sport participants travel to Chill Factore in Manchester than ski at the Oval. However, not everyone is prepared accept the trouble and expense involved; it is probably an hour's drive for many Wirral residents, and it is out of the question for those on lower incomes.

Clearly, the FPM needs to be applied to assess the current demand more accurately.

10.3: Summary

The summary just refers to the existing facility as it is and not how it needs to be. The specific need is for a new, much larger centre which caters for the needs of the sport.

There is spare capacity because the management now leaves everything to the Club on a voluntary basis and most snow-sport participants want much more than just a nursery slope.

NB representor therefore considers plan not positively prepared as it does not fully assess needs for all outdoor sports.

**omplies with the Duty
to co-operate**
* Yes
* No

**Please give details of
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<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
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<p>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>Forestry Commission. It is also essential that the Governing Bodies of Snow-sports are involved in planning, along with representatives of the local snow-sport community, most of whom are not members of a club.</p> <p>A detailed proposal for a state-of-the-art facility to replace the Oval slope will be submitted as a separate document, in pursuance of WS 5.3, 'D New Snow-sport facility Wirral.docx'. This would be a national asset and therefore a tourist attraction. It is based on a facility in Copenhagen, Denmark which provides a major ski slope on the roof of a large building, rather than a hill. See: https://www.copenhill.dk/en.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>No, I do not wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the</p>	<p>Yes</p>

**Inspector's
recommendations
and adoption of the
Plan).**

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

Comment ID	LPSD-156
Person ID	1312315
Include files	LPSD-152-153,156-Lewis-13.05_Redacted.pdf.pdf
Consultee Name	Mr Richard Lewis
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 3
Title	Strategy for Housing
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	<p>Please refer to attachment</p> <p>I am very much in support of the Council's declaration that they will ensure that there will be no development on our precious green belt land or green spaces.</p> <p>This means that the Council will have to resist the overtures of various property developers who will be keen to get permission for development of upmarket and expensive houses in the most attractive green locations in the Borough. This includes the naked greed of the Leverhulme Trust, who are presenting their case as if they are doing us all a big favour. They should be concentrating on farming their vast tracts of land to help meet our nation's need to be more self-sufficient food-wise rather than sacrificing their land to property development.</p> <p>If there is a need to build 13,000 new dwellings(which is very unlikely given that the population predictions in the Local Plan indicate only a small population increase), then that need is for affordable dwellings, not huge expensive houses that only the over-privileged can afford.</p> <p>Although the public pronouncements have been made, such is the lack of trust in today's politicians that the electorate is still very sceptical that the Council will deliver on its promises. I am sure that you appreciate the reality of this situation, so your planning people and the politicians will have to remain committed and vigilant.</p> <p>It is a disgrace that planning appeals are heard in Bristol, as this heavily favours the developers who are able to throw significant resources at the appeal, but those who oppose development are not able to do this. This is a serious problem, an answer to which must be found.</p>
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	

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

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

<p>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-157

Comment ID	LPSD-157
Person ID	1323290
Include files	LPSD-157 & 168-EM-Chapman 2206_Redacted
Consultee Name	Ms Heather Chapman
Position	Head of Research
Company / Organisation	West Kirby Museum
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 10.6
Title	Open Space
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	LGS-SA6.3

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	<p>I am writing in support of the draft localplan designation of Greenfields as Local GreenSpace, submitted on behalf of the residents of the Abbey Manor Estate. See below</p> <p>The plot, Barclays' Meadow (that you call Greenfields), has been agricultural land for at least two hundred years and is the only remaining agricultural field in central WestKirby. It lends itself to the magnificent vista on entering West Kirby from Column Road,boasting a rural landscape with sheep grazing. This is a pleasure enjoyed by local residents and visitors alike.</p> <p>West Kirby has increased housing and population, resulting in traffic build ups on GrangeRoad, with three sets of traffic lights on entering West Kirby from Column Road. At onetime Grange Road traffic was only a problem at peak times, whereas nowadays, whatevertime of the day, there is traffic congestion on Grange Road, alongside Greenfields. Itwould be very dangerous to even consider yet another access road to Grange Road.</p>
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	

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

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

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

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

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

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

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

Comment ID	LPSD-158
Person ID	1312505
Include files	
Consultee Name	CHRIS STRINGER CHRIS STRINGER
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 1.1
Title	Homes
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1.1
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	No
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Wirral MBC seem hell bent on building houses all over the greenbelt, thus destroying the character of Wirral. There is no need to build anywhere on the diminishing greenbelt given all the brownfield sites that are available and the fact that the population of Wirral is falling. Peel Holdings are doing exactly that: holding land in its land bank instead of developing in Birkenhead. Leverhulme Estates are part of the problem, greedily trying to cash in. It is the duty of Wirral MBC to protect Wirral for future generations.

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

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

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

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

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

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

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

Comment ID	LPSD-159
Person ID	1245650
Include files	LPSD-159-Renshaw_Redacted.pdf
Consultee Name	Cliff Renshaw
Position	Chairman
Company / Organisation	Rock Ferry Waterfront Trust
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 4
Title	Strategy for Economy and Employment
To which part of the Local Plan does this representation relate?	Site
<ul style="list-style-type: none"> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment 	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	OS-SA3.23

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

<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</p>	<p>The designation in the submission version of the Draft Policies map would appear to be inappropriate and given the current and proposed uses would request to amend the Draft Policies Map to define the several sites including the RMYC premises, TSC's premises, the Refreshment Rooms and its gardens, the Vestor site, slipway and pier together with the former Royal Rock Hotel site all be designated for use for Urban Sport and Recreation.</p>

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

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

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

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

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

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

Comment ID	LPSD-160
Person ID	1241774
Include files	
Consultee Name	Dr John Clark
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 1.1
Title	Homes
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1
Please state which Site ID/Reference this representation relates to.	

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

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

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

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

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

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

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

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

Comment ID	LPSD-161
Person ID	1323329
Include files	LPSD-161-EM-Lindsley-3105_Redacted.pdf
Consultee Name	Ms Melanie Lindsley
Position	Development Team Leader (Planning)
Company / Organisation	The Coal Authority
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 1
Title	The Development and Regeneration Strategy for Wirral 2021 - 2037
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1
Please state which Site ID/Reference this representation relates to.	

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

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

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

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

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

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	No
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Comment ID	LPSD-162
Person ID	1248400
Include files	LPSD-162- EM-Simmons 2306_Redacted.pdf
Consultee Name	Tim Bettany-Simmons
Position	Are Planner - Special Projects
Company / Organisation	Canal and River Trust/Glandwr Cymru
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 1
Title	The Development and Regeneration Strategy for Wirral 2021 - 2037
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS1 whole plan no comment
Please state which Site ID/Reference this representation relates to.	

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

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

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

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

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

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

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

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

LPSP-163

Comment ID	LPSP-163
Person ID	1323427
Include files	LPSP163-164-EM-Staniland WUTHCCCAtt 2 of 9 2306_Redacted.pdf LPSP163-164-EM-Staniland WUTHCCCAtt 4 of 9_Redacted.pdf LPSP163-164-EM-Staniland WUTHCCCAtt 3 of 9 2306_Redacted.pdf (1) LPSP163-164-EM-Staniland WUTHCCCAtt 5 of 9 2306.pdf LPSP163-164-EM-Staniland WUTHCCCAtt 6 of 9_Redacted.pdf LPSP163-164-EM-Staniland WUTHCCCAtt 7 of 9 2306_Redacted.pdf LPSP163-164-EM-Staniland WUTHCCCAtt 8 of 9_Redacted.pdf LPSP163-164-EM-Staniland WUTHCCCAtt 9 of 9 2306_Redacted.pdf LPSP163-164-EM-StanilandWUTHCCC em2 2306_Redacted.pdf LPSP163-164-EM-Staniland WUTHCCCForm 2306_Redacted.pdf
Consultee Name	WUTHNHSFTandCCCNHSFT
Position	
Company / Organisation	
Agent ID	1323141
Agent Name	Mr David Staniland
Position	Sr. Consultant Town Planner
Company / Organisation	BDP
Number	Policy WS 1
Title	The Development and Regeneration Strategy for Wirral 2021 - 2037
To which part of the Local Plan does this representation relate?	Policy
* Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat Regulations Assessment	
Please state which paragraph number(s) this representation relates to.	

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

<p>* Not Consistent with National Policy</p>	
<p>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</p>	<p>Please see accompanying representations. In short our client would like to see their site specifically allocated for development, with two scenarios suggested for the reconfiguration of land across the Clatterbridge hospital campus. .</p> <ol style="list-style-type: none"> 1. mixed use, incorporating health care and residential uses - 2. developed site in the Green Belt. also described as "a Mixed Use Development Site in the Green Belt"
<p>omplies with the Duty to co-operate * Yes * No</p>	<p>Yes</p>
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying</p>	

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

<p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>To promote our client's site's allocation. To address any queries the Inspector might have regarding the commentary contained within the Representations.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

Comment ID	LPSD-164
Person ID	1323427
Include files	LPSD163-164-EM-Staniland WUTHCCCAAtt 2 of 9 2306_Redacted.pdf
Consultee Name	WUTHNHSFTandCCCNHSFT
Position	
Company / Organisation	
Agent ID	1323141
Agent Name	Mr David Staniland
Position	Sr. Consultant Town Planner
Company / Organisation	BDP
Number	Policy WP 8.1
Title	Green Belt
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WP 8.1
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>Please see accompanying representations. In short our client would like to see their site specifically allocated for development, with two scenarios suggested for the reconfiguration of land across the Clatterbridge hospital campus. .</p> <ol style="list-style-type: none"> 1. mixed use, incorporating health care and residential uses - 2. developed site in the Green Belt. also described as "a Mixed Use Development Site in the Green Belt" <p>seeking a change to policy</p>

omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of	Add.. Developed Site within the Green Belt Policy Large-scale existing sites located within the Green Belt are identified on the policies map, where the principle of development will be supported. Development proposals within the areas defined on the policies map that are either in the form of limited infilling or the partial or complete redevelopment of previously developed sites, will be supported where there is no greater impact on the openness of the Green Belt and the purpose of including land within it than the existing 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.</p>	<p>Partial or complete redevelopment proposals should be planned in line with a development strategy for the wider site, setting out the appropriate scale, layout, heights, type of uses and phasing of development, including the buildings for retention or redevelopment, and incorporating appropriate boundary treatments.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>To promote our client's site's allocation. To address any queries the Inspector might have regarding the commentary contained within the Representations.</p>

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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LPSD-165

Comment ID	LPSD-165
Person ID	1323428
Include files	LPSD165-166-EM-Staniland WUTH Att 1 2306_Redacted.pdf LPSD165-166-EM-Staniland WUTHForm 2306_Redacted.pdf
Consultee Name	WUTHNHST
Position	
Company / Organisation	
Agent ID	1323141
Agent Name	Mr David Staniland
Position	Sr. Consultant Town Planner
Company / Organisation	BDP
Number	Policy WS 1
Title	The Development and Regeneration Strategy for Wirral 2021 - 2037
To which part of the Local Plan does this representation relate?	Policy
<ul style="list-style-type: none"> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment 	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
Please give details of why you consider the Local Plan is unsound. Please be	Please see accompanying Representations. In short, our client does not believe their site's designation within the Green Belt is justified. seek removal from the green belt OR designation as a Developed Site in the Green Belt

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

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)

To promote the removal of our client's site from the Green Belt. To address any queries the Inspector might have regarding the Green Belt assessment we have undertaken, contained within the representations

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

Comment ID	LPSD-166
Person ID	1323428
Include files	LPSD165-166-EM-Staniland WUTH Att 1 2306_Redacted.pdf
Consultee Name	WUTHNHST
Position	
Company / Organisation	
Agent ID	1323141
Agent Name	Mr David Staniland
Position	Sr. Consultant Town Planner
Company / Organisation	BDP
Number	Policy WP 8.1
Title	Green Belt
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WP 8.1
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please see accompanying Representations. In short, our client does not believe their site's designation within the Green Belt is justified. seek removal from the green belt OR designation as a Developed Site in the Green Belt

omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of	Add. Developed Site within the Green Belt Policy Large-scale existing sites located within the Green Belt are identified on the policies map, where the principle of development will be supported. Development proposals within the areas defined on the policies map that are either in the form of limited infilling or the partial or complete redevelopment of previously developed sites, will be supported where there is no greater impact on the openness of the Green Belt and the purpose of including land within it than the existing 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.</p>	<p>Partial or complete redevelopment proposals should be planned in line with a development strategy for the wider site, setting out the appropriate scale, layout, heights, type of uses and phasing of development, including the buildings for retention or redevelopment, and incorporating appropriate boundary treatments.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>To promote the removal of our client's site from the Green Belt. To address any queries the Inspector might have regarding the Green Belt assessment we have undertaken, contained within the representations</p>

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-167
Person ID	1245151
Include files	LPSD-167-EM-Harrison Form 0807_Redacted.pdf
Consultee Name	Mr Alwyn Harrison
Position	
Company / Organisation	Friends of Ashton Park
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WP 6.3
Title	Residential Sites
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	RES-SA6.4

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>Proposal for Construction of 35 Dwellings on the Site "Land at Grange Farm" W.P. 6.3. West Kirby and Hoylake.</p> <p>The Grange Hill Allotment Society wish to object to the above on the following grounds and propose that the site be designated a Local Green Space:-</p> <p>The proposed development site is inappropriate for housing development because of its location on grassed land surrounded by designated Open Space in the form of Grange Hill Open Space and Local Wildlife Site (including Grange Hill Allotments). It forms a natural extension of this area. Housing development will intrude on these open space and wildlife areas (see Open Spaces and Allotments Policies) which are hugely important to the community of West Kirby and visitors to the area.</p> <p>The impact of the wildlife known to inhabit the wooded and heathland area – badgers, foxes and common lizard.</p>

	<p>The site gives an opportunity to extend the protection and management of the Open Space and Local Wildlife Site to this grassed area.</p> <p>The impact of inappropriate development (in particular oversized houses or flats) on the views to and from this prominent sandstone ridge (viewable from all across the Wirral) and on the view especially from the listed and revered War Memorial on Grange Hill. Flats built in the past below the War Memorial demonstrate the sad impact of inappropriate development on or close to the skyline and adjacent to the listed War Memorial.</p> <p>Intrusion on the secluded access track to the War Memorial from Grange Old Road.</p> <p>Difficult traffic access from Grange Hill (road) and the junction of Black Horse Hill, Telegraph Road, Grange Hill and Grange Old Road.</p> <p>Impact on the adjacent secluded allotment site – trespassing, overlooking, dumping over rear fences, planting of trees creating shadow, run-off onto the allotment, ground contamination, affecting the peace of the allotments and intrusion on the skyline.</p> <p>The proposals with 35 houses represent overdevelopment of the site.</p> <p>Danger of the frequent gorse fires to the development from Grange Hill.</p> <p>There is now on need to take up sensitive sites like this to deliver Wirral's housing targets.</p> <p>Future pressure of development in this immediate area and loss of allotment site for housing (see Open Spaces and Allotment Policies). see details attached.</p>
omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal	

<p>compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>It is proposed that, instead of development, the proposed area of development be designated a Local Green Space.</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>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

Comment ID	LPSD-168
Person ID	1323290
Include files	LPSD-157 & 168-EM-Chapman 2206_Redacted
Consultee Name	Ms Heather Chapman
Position	Head of Research
Company / Organisation	West Kirby Museum
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 10.6
Title	Open Space
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	LGS-SA6.3

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	<p>We fully support the draft local plan designation of Greenfields as Local Green Space as legally compliant and sound.</p> <p>West Kirby features prominently in advertising for Merseyside tourism and the number of visitors coming to the village to enjoy the beach, walk to Hilbre Island and spend money in the shops and cafes has increased significantly in the last five years. The majority of those who arrive by car do so down Grange Road. The delightful open aspect of the fields with sheep grazing, mature pine trees and views of the sea and Welsh Hills is their first impression of our community. The site is a peaceful haven for wildlife and the one of the historic features of the site are the rare and well-established ant hills which attract bird life.</p> <p>For those of us who live here that perspective never ceases to lift our spirits and enhance the privilege of living in such a place. To lose this unique vista to another housing estate would be a major, irreversible loss for residents and visitors. One aspect of the increase in visitors is the greater volume of traffic using Grange Road at peak times. Extensive development of the site would open a new access way onto a steep hill with poor visibility, requiring additional traffic lights to avoid a traffic hazard. There are already three sets of traffic lights for pedestrian crossings within 500 m of the Greenfields site through the village and traffic currently tails back up past the Greenfield site to the top of the hill from the village centre on a daily basis. In the Councils Draft UDP the independent consultants decided that this site had the following criteria to be supported as a Local Green Space designation: - Reasonable proximity, beauty, tranquillity, richness in wildlife, local character. We would add that the site also offers historic significance, being the last remaining agricultural fields within the town boundary and fronted by original boundary marker stones and red sandstone walls, a key visual feature in the town and one highlighted in the draft plan for retention.</p>
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	

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

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)

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

Comment ID	LPSD-169
Person ID	1323289
Include files	LPSD-169-EM-Edwards 2006_Redacted.pdf
Consultee Name	Mr Steven Edwards
Position	Senior Environmental Planner
Company / Organisation	SP Energy Networks
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 10
Title	Infrastructure Delivery
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 10 Infrastructure Delivery
Please state which Site ID/Reference this representation relates to.	

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

omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	I have reviewed the proposals and provide comments for SP Energy Networks who operate and manage the electricity network up to 132kV on behalf of the licenced network operator, SPManweb, for the area covered by the Local Plan. In general, SP Energy Networks has no objection to the Draft Local Plan proposals subject to required measures to protect SP Manweb network assets and ensure safe working around any affected network.
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:

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-170

Comment ID	LPSD-170
Person ID	1312314
Include files	LPSD-170-EM-Taylor 1105_Redacted.pdf LPSD-170-EM-Taylor-Attachment 1 1105_Redacted.pdf
Consultee Name	Ms Rebecca Taylor
Position	
Company / Organisation	Fisher German LLP
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 10
Title	Infrastructure Delivery
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 10 Infrastructure Delivery
Please state which Site ID/Reference this	

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

as precise as possible.	
omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	Thank you for your letter/ email to Exolum Pipeline System Ltd dated 9 May 2022 regarding the above Please find attached a plan of our client's apparatus We would ask that you contact us if any works are in the vicinity of the Exolum pipeline or alternatively go to www.lsbud.co.uk , our free online enquiry service
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

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

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

Comment ID	LPSD-173
Person ID	1312045
Include files	LPSD-60-62, 173 & 174-EM-Stevens Attach 2 of 3_Redacted.pdf LPSD-173-EM-Stevens Attach 3 of 3_Redacted.pdf
Consultee Name	Mr Graham Stevens
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Part 3
Title	Strategic Policies
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	3.15 Housing and following and related Paragraphs
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	1. The Council has not properly assessed and based the Draft Local Plan on truly 'objectively assessed needs'. It has acknowledged separately that the 'Housing Need' employed is higher than required by best practice and latest Data. 2. The Draft Local Plan 'Regeneration-led' approach is essential and strongly supported and 'justified' but the excessive 'Housing Need' figure is NOT justified.

as precise as possible.	<p>3. The Draft Local Plan based upon a 'Housing Need' which is excessive and not based on best and up-to-date Data unnecessarily risks being 'effective' and 'deliverable', including the success of Regeneration and the protection of the Green Belt.</p> <p>4. The Draft Local Plan is not fully consistent with National Policy in that it does not employ 'best practice' and 'up-to-date' methodology and Data in the assessment of 'Housing Need'. I attach a short Paper with related information and comments on the initial release of 2021 Census Data.</p>
omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	There seems to be sufficient evidence of compliance.
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	Modifications are outlined in this and previous 'Representations' in answer to earlier Questions. The extent of change of the DLP and requested 'Main Modification' concerning the 'Housing Need' figures are beyond the editing of text and fully outlined in my Documents attached to my earlier 'Representations'.

<p>consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Modifications from previous representations (LPSD-60, 61 and 62):</p> <ul style="list-style-type: none"> • in short housing mix inconsistent with evidence and SHMA should explain further how it has reached conclusions. Change in housing mix needed • plan should use 2018 projections and explain properly how it has arrived at need. • in short housing mix inconsistent with evidence and SHMA should explain further how it has reached conclusions. <p>See attachment LPSD-60-62, 173 & 174-Stevens_Redacted.pdf</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>If you wish to participate in the</p>	<p>I mistakenly highlighted 'NO' to being involved at the Plan Examination with my three earlier 'Representations' and would like to change that to 'YES' as here.</p>

hearing session(s), please outline why you consider this to be necessary:	Reasons for wishing to participate in hearing session(s) is that I have been closely involved with Wirral Green Space Alliance in discussions with the Council for the last 3 to 4 years and have supplied them with several detailed Papers over that time. My past employment as a government statistician is also relevant.
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	Yes

Comment ID	LPSD-174
Person ID	1312045
Include files	LPSD-174-EM-Stevens Attach 1 of 3_Redacted.pdf LPSD-60-62, 173 & 174-EM-Stevens Attach 2 of 3_Redacted.pdf
Consultee Name	Mr Graham Stevens
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 1.2
Title	Employment
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	Para 3.22 Need for Employment Land and Policy WS4 and 3.15 Housing Need
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	1. The Council has not properly assessed and based the Draft Local Plan on truly 'objectively assessed needs'. It has acknowledged separately that the 'Housing Need' employed is higher than required by best practice and latest Data. There is no need for any 'Uplift'. 2. The Draft Local Plan 'Regeneration-led' approach is essential and strongly supported and 'justified' but the excessive 'Housing Need' figure is NOT justified, nor is any 'Uplift'.

<p>as precise as possible.</p>	<p>3. The Draft Local Plan based upon a 'Housing Need' which is excessive and not based on best and up-to-date Data unnecessarily risks being 'effective' and 'deliverable', including the success of Regeneration and the protection of the Green Belt. The 'Uplifts' increase the problem.</p> <p>4. The Draft Local Plan is not fully consistent with National Policy in that it does not employ 'best practice' and 'up-to-date' methodology and Data in the assessment of 'Housing Need' and any requirement for an 'Uplift'.</p> <p>1. Introduction and Summary [extract from attached short Paper]</p> <p>1.1. Wirral Borough Council is developing a Local Plan with a “target” of 13,360 new dwellings in a 16- year period, 2021 – 2037, based on the DLUHC Standard Method. The Local Plan has also been informed by the 2021 SHMA and the “Wirral Economic Strategy 2021 – 2026” .</p> <p>1.2. The Standard Method is a simple starting point for assessing the number of households to plan for. The SHMA concludes that uplifts to household projections are needed to allow for an annual average employment growth of “+82 per year” (table 4.4, p91). It is assumed the “+82” refers to people in jobs based in Wirral and not households. Wirral people in employment includes those who work in Wirral based jobs and those who commute outside of Wirral.</p> <p>1.3. This note considers economic forecasts and employment trends to assess the realism of employment growth and suggests that growth is uncertain on the basis of trends in recent Census population estimates, in employment, in Wirral based jobs, and in economic performance. The recent trends in Wirral workforce jobs by industries coupled with economic issues forecast by the OBR imply that Wirral job numbers, in the medium term, are more likely to decrease rather than increase.</p> <p>1.4. Summary Points</p> <ul style="list-style-type: none"> • Employment trends since 2000 and the economic headwinds that the OBR Outlooks paints around its forecasts of GDP do not support the high employment growth scenarios of the previous SHMA 2016, and “consequent need for people to accommodate” such scenarios. • Wirral is a dormitory for a wider economic area (Liverpool, Cheshire) and its working age population has declined and will continue to decline. Given that Wirral's employment is based in the wider area, the decline in working age population, and Wirral's relatively low economic and employment performance; any assumptions for modelling jobs forecasts should be modest, and their impact be either downward or level at the most. • The longer- term outlook on GDP growth is weakly positive, subject to adverse economic environment (eg; energy costs, a tight labour market), and not at the level as in previous economically better times – the Office of Budget Responsibility (OBR). The forecast changes in GDP are lower than the long run trend for the UK economy, and are unlikely to generate a steady rise in employment in Wirral. Assumptions in modelling Wirral jobs forecasts should reflect the recent (and impending) adverse conditions. They are material to Wirral's local plan because they represent a recent deterioration in the economic climate that affects jobs and the plan's aspiration for jobs- and Wirral's jobs level appears not to be as buoyant under changing conditions as other neighbouring authorities, eg Liverpool. • Certainty about continued rises in employment, even if modest, need high economic growth coupled with a major inward shift in economic activity sustained over five, ten or more years. The inputs from the original Wirral Growth Plan and newer Wirral Economic Strategy are mainly aspirational targets, ways of working with residents and business, and an analysis of Wirral's strengths and weaknesses. Such content is not the same as a set of planned and specific developments by new or existing businesses, or movement of businesses to Wirral. The developments at the Wirral Waters Enterprise Zone and Docklands are planned to 2037 and beyond. The main output is a needed regeneration, thousands more dwellings, some space for offices and warehousing, and development of the port facilities. The level of jobs growth is uncertain or unknown with businesses expected to respond and work with the plans. <p>I attach a short Paper with related information and comments .</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	<p>Yes</p>
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	<p>There seems to be sufficient evidence of compliance.</p>
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please</p>	

<p>be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat</p>	<p>Modifications are outlined in this and previous 'Representations' in answer to earlier Questions. The extent of change of the DLP and requested 'Main Modification' concerning the 'Housing Need' and Employment figures are beyond the editing of text and fully outlined in my Documents attached to my earlier 'Representations'. [change required to employment forecasts/employment needs identified are overestimated].</p> <p>Modifications from previous representations (LPSD-60, 61 and 62):</p> <ul style="list-style-type: none"> • in short housing mix inconsistent with evidence and SHMA should explain further how it has reached conclusions. Change in housing mix needed • plan should use 2018 projections and explain properly how it has arrived at need. • in short housing mix inconsistent with evidence and SHMA should explain further how it has reached conclusions. <p>See attachment LPSD-60-62, 173 & 174-Stevens_Redacted.pdf</p>

<p>Regulations Assesment 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)? * No, I do not wish to participate in hearing session(s) * Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>I mistakenly highlighted 'NO' to being involved at the Plan Examination with my first three earlier 'Representations' and would like to change that to 'YES' as here. Reasons for wishing to participate in hearing session(s) is that I have been closely involved with Wirral Green Space Alliance in discussions with the Council for the last 3 to 4 years and have supplied them with several detailed Papers over that time. My past employment as a government statistician is also relevant.</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). * Yes</p>	<p>Yes</p>

* No	
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LPSD-175

Comment ID	LPSD-175
Person ID	1323465
Include files	LPSD-175-178 and 262-264 EM-Dickinson Att1 2306_Redacted.pdf
Consultee Name	Burbo Bank Windfarm Operations
Position	
Company / Organisation	
Agent ID	1323293
Agent Name	Ms Dawn Dickinson
Position	Senior Land & Property Manager
Company / Organisation	Orsted
Number	Policy RA 2
Title	Scott's Quay Regeneration Area
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	RES - RA 2.1

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	refer attachment highway and shared space safety for users (cyclist, pedestrians etc) concern that increased housing will result in complaints about operations of the company

omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of	<p>Given the potential increase in promenade users, Ørsted would like to see further improvements to prohibit cycling within the viewing area of the promenade adjacent to Ørsted's O&M base and the installation of triple cycle barriers (locations and an example of a suitable barriers are provided within Appendix A). This would have the added benefit of discouraging motorised vehicles, such as motor scooters and motorbikes that are known to use the promenade illegally which would protect all users of the viewing area that are presently at risk of collision. These requests are aligned with Policy WS4.4 maintaining uninterrupted public access along the Wirral Waterfront, whilst enhancing public safety.</p> <p>are concerned that the increased residential allocation may result in complaints from new residents regarding these usual operations (which may require floodlighting, vessel and vehicle warning sirens and other perceived nuisances presently acceptable within a port related environment) incompatible with residential use. Ørsted would like to see that sound deadening and screening is incorporated within any new residential development to reduce any complaints arising out of these issues</p>

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

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

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

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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LPSD-176

Comment ID	LPSD-176
Person ID	1323465
Include files	LPSD-175-178 and 262-264 EM-Dickinson Att1 2306_Redacted.pdf
Consultee Name	Burbo Bank Windfarm Operations
Position	
Company / Organisation	
Agent ID	1323293
Agent Name	Ms Dawn Dickinson
Position	Senior Land & Property Manager
Company / Organisation	Orsted
Number	Policy WS 7
Title	Principles of Design
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 7.1 Design Principles
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer to attachment The O&M base's normal hours are between 6am and 6pm seven days a week. During this time the operations and associated activities will include vehicle movements, vessel loading of parts, equipment and personnel and the berthing and sailing of CTV's. Ørsted are concerned that the increased residential allocation may result in complaints from new residents regarding these usual operations (which may require floodlighting, vessel and vehicle warning sirens and other perceived nuisances presently acceptable within a port related environment) incompatible with residential use.

<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</p>	<p>Ørsted would like to see that sound deadening and screening is incorporated within any new residential development to reduce any complaints arising out of these issues. Ørsted would be grateful if these design principles are included within Policy WS 7.1.</p>

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

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

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

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-177
Person ID	1323465
Include files	LPSD-175-178 and 262-264 EM-Dickinson Att1 2306_Redacted.pdf
Consultee Name	Burbo Bank Windfarm Operations
Position	
Company / Organisation	
Agent ID	1323293
Agent Name	Ms Dawn Dickinson
Position	Senior Land & Property Manager
Company / Organisation	Orsted
Number	Policy WS 9.5
Title	Overnight Lorry Parking
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 9.5 overnight lorry parking
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	Please refer to attachment Overnight Lorry Parking (Policy WS 9.5) Ørsted note that there are associated benefits in the allocation of residential units. Ørsted welcomes the introduction of Policy WS 9.5 which coupled with the new residential allocation and the planned regeneration of the area should safeguard against overnight lorry parking which presently blights East Street. RES RA2.1/RA2.2 coupled with the implementation of WS 9.5 will result in safer roads, greater visibility and a clearer vehicular route to Ørsted's O&M Base at Kings Wharf.
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	

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

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

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

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

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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LPSD-178

Comment ID	LPSD-178
Person ID	1323465
Include files	LPSD-175-178 and 262-264 EM-Dickinson Att1 2306_Redacted.pdf
Consultee Name	Burbo Bank Windfarm Operations
Position	
Company / Organisation	
Agent ID	1323293
Agent Name	Ms Dawn Dickinson
Position	Senior Land & Property Manager
Company / Organisation	Orsted
Number	Policy WS 10.2
Title	District Heat Networks
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 10.2 District Heat Networks
Please state which Site ID/Reference this representation relates to.	

<p>Please state which Policies Map (Inset Map number(s)) this representation relates to.</p>	
<p>Legally compliant * Yes * No</p>	
<p>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</p>	
<p>Sound * Yes * No</p>	Yes
<p>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</p>	<p>Please refer to attachment Birkenhead Heat Network Project Ørsted are pleased to see that their O&M Base falls within the Birkenhead Heat Demand Assessment Area as identified in figure 3.12 of the Submission Draft. Ørsted are keen to work with all parties in respect of the assessment.</p>
<p>If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy</p>	
<p>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</p>	

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

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

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

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

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-179
Person ID	1323484
Include files	LPSD-179 -EM-Exolum 1506_Redacted.pdf LPSD-179 -EM-Exolum A1_Redacted.pdf
Consultee Name	Exolum
Position	
Company / Organisation	
Agent ID	1323316
Agent Name	Exolum Pipeline System Ltd
Position	
Company / Organisation	
Number	Policy WS 10
Title	Infrastructure Delivery
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 10 Infrastructure Delivery
Please state which Site ID/Reference this representation relates to.	

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

omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	Thank you for your email to Exolum Pipeline System Ltd dated 13th June 2022 regarding the above. Please find attached a plan of our client's apparatus. We would ask that you contact us if any works are in the vicinity of the Exolum pipeline or alternatively go to www.lsbud.co.uk , our free online enquiry service.
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of	

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

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

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

Comment ID	LPSD-180
Person ID	1237546
Include files	
Consultee Name	Dr Hilary Ash
Position	Hon Conservation Officer
Company / Organisation	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WD 3
Title	Biodiversity and Geodiversity
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	6.29
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>The section about 'significance' is woolly and opaque because it is out of context as it has been copy and pasted out of CIEEM Box 3 GUIDELINES FORECOLOGICAL IMPACT ASSESSMENT IN THE UK AND IRELAND. In 6.29 they state When determining the requirement for EclA and then paste a section regarding significant effects out of the Guidelines. (https://cieem.net/resource/guidelines-for-ecological-impact-assessment-ecia/). However this is misleading as the CIEEM document states that emphasis in EclA is on 'significant effects' (see Box 3) rather than all ecological effects.</p> <p>so to include this Box 3 paragraph in tandem with determining the requirements for an EclA is confusing. It really needs simplifying and they are just complicating matters by using that section. (This submission replaces our previous one on the same section, after advice from a colleague whose professional work involves reports for planning applications.)</p>

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

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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LPSD-181

Comment ID	LPSD-181
Person ID	1323501
Include files	LPSD-181-EM-Gregg Attach 1807_Redacted.pdf
Consultee Name	Professor David Gregg
Position	Steering Group Member
Company / Organisation	Wirral Green Space Alliance (WGSA)
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 1.1
Title	Homes
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	Para 3.15 to 3.21 Housing Need and Policy WS 1.1 Parts B and C + related Paras
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Executive Summary 1. The scale of new housing built during the Local Plan period to accommodate supposed demographic changes will have strong impacts on many plan aspects including provision of services, hospitals, GPs, schools, transport needs and so on. The proposed Local Plan housing target of 13,360 d in 16 years, is based on the 2014 ONS Population & Household Number projections for Wirral, embedded in the 2021 'mutant 2' Standard Method. This methodology has been heavily criticised for its technical weaknesses and unintended impacts on green belt areas around the country. The intended White Papers on 'The Future Planning System' and 'Housing Requirement Calculations', were withdrawn and the HCLG minister, Robert Jenrick, was sacked.

2. Although the Local Plan identifies a need of 13,360 d in para 3.15 page 52, it also provides additional information. We are told Wirral HHs are currently 144,596 and that HH growth over the LP period is 6.1% (from the SHMA Update October 2021, table 2.1). This is based on the more recent 2018 ONS release HH projections. This gives a HH number of 153,416 by 2037 and a growth of 8,820 HHs over the LP (and 10,055 d after affordability uplift). This is just 75% of the proposed LP housing need. No mention or explanation of the difference is offered in 3.15. No implications for the LP are considered. Other sections of the LP similarly purport to use the ONS 2018 HH projections. Page 25; para 2.1 gives the Wirral 2021 and 2037 population from this source. This gives 11,349 h need after affordability uplift. Page 29; Figure 2.4 gives slightly different figures. This leads to 10,333 h need after uplift. If we apply the real world, observed zero trend HH size data for Wirral to these LP population numbers we get 3,885 h and 3,940 h need after affordability uplift, just ~30% of the adopted housing need of 13,360 h. The housing section of the 'Pre-submission LP: Sustainability Appraisal Report, April 2022' also notes in 2.1.27, average delivery rates of 383 dpa or 6,128 d in 16 years. Other published data we will examine suggests ~4,900 d in 16 years. The LP is not consistent, nor coherent in its assumptions for planning purposes. (See ES 10 and sections 1 & 2 & Appendix 7). But note also that both 2014 and 2018 ONS projections are now officially obsolete and the Office for Statistics Regulation has instructed that ONS 2021 projections must be used in estimating future housing needs.

3. Analyses of other ONS and administrative data, show that Wirral HH numbers growth rate will continue to decline in coming decades leading to even lower housing requirements in reality (see 4).

4. The Wirral Local Plan is therefore based on a rejected and obsolete methodology. For many reasons political, economic & technical, it is certain that future national and LA level housing requirement 'targets' will fall and that new targets will be 'advisory' not

'mandatory'. New methodology should be in place in the next year or so. The Wirral Local Plan does not give any regard to these changing circumstances which will cause large changes in the nominal housing requirements over the plan period, with many knock-on effects.

5. In July 2022 we cannot know the exact form of the new Standard Method and a future Wirral housing 'target'. However the author, over 3 years, has analysed all available Wirral administrative data sources, ONS Labour Force Survey data, considered the views of independent experts and the ONS 2016, 2018, 2020(interim) Principle and Variant Population and HH Number Projections. Over two dozen housing requirement estimates have been made under various assumptions and reported to WMBC. The mean 'forecast' is for ~4,400 d over the 16 year plan compared with the ONS 2014 based 13,360 d of the council. This is a very substantial change from the LP base assumption. Is the lower figure credible?

See below.

6. In early 2021, Coventry and Wirral activists made a formal complaint to the UK Statistics Authority concerning the stark differences between the population and HH number projections based on the 'mandated' ONS 2014 release and what local administrative and other government data suggested for historical and current HH numbers, and hence housing requirement growth. A technical Review by the Office for Statistics Regulation was held during which the author presented several serious technical faults concerning the Wirral projections and those for other LA areas.

These included serious distortions introduced into initially accurate Wirral birth and death numbers and UK net migration into Wirral, caused by numerical biases from the ONS 'top down' hierarchical forecasting system. This author also showed how estimates of UK internal migration flows were strongly influenced through biases introduced by the treatment of student numbers in university towns and nearby areas. Wirral and Coventry were but two examples of many. The author has also demonstrated to the OSR other serious ONS modelling distortions. Since Wirral has very low levels of international net immigration there should be very little difference between the ONS Principal population projection and the 'Low national immigration' variant projection for Wirral. Instead, Wirral population growth rate falls significantly in the ONS low immigration scenario. This demonstrates that somehow in the ONS modelling, the international immigration assumptions were affecting the Wirral, internal UK net migration flow and distorting growth here, upwards. This is unacceptable and probably the same distortion affects any low immigration LA. The author also showed that the ONS ignored the steady HH size over the last few decades and imposed a strong HH size downtrend last seen in the 1990s. This reflected a 'belief' in the discredited 'suppressed demand' theory, contrary to the observed evidence and contrary to the principle and current rule, that the ONS projections should reflect historical data trends only. These analyses from Wirral and those offered by Coventry, Guildford and several other towns who took part in the OSR Review, successfully made the technical case against the current ONS methods.

7. The OSR concluded that the obsolete ONS 2014 based projections and the old technology underpinning them, must not be used in future for planning purposes. They accepted that the technical problems identified led to the overestimation of population growth rates at LA level. They also criticised the ONS failure to 'sense check' their final projections against real LA data trends and they ordered a review of the 'university town' problem. They concluded that future ONS inputs to strategic planning must be based on up to date evidence and methodology and that LAs should be encouraged by the ONS to consider which of the several ONS Population & HH number projection Variants in each release, best matched local demographic circumstances. Finally, the OSR, tellingly, criticised the ONS for not making clear to the MHCLG, the limitations and uncertainties of the Principal population projection, used in isolation, upon which 'mandated' LA housing targets were being enforced.

8. The OSR also reported to the HOC (then) HCLG Select Committee which endorsed the OSR Review and recommendations and again criticised the ONS and the MHCLG. In addition to accepting that the latest data and technology must be used for planning purposes, the Committee endorsed the view that LAs should be able to present their own assessment of housing requirements at Inspection, taking into account real world context such as having significant green belt and geographical constraints (both significant in Wirral's case). The new 'Levelling Up' minister, Michael Gove, was summoned to the Select Committee on the 8th of November 2021 where, having been well briefed, he fed back the OSR conclusions and those of the Committee itself. The 300,000+ per annum national 'mandated' build 'target' was now a 'desire' he said, given the real world 'constraints'. Mr. Gove expressed the view that planning inspectors must take a 'more sophisticated' approach than 'the computer says so' in future. He conceded that increasing housing supply would not significantly deal with the 'affordability' problem. He had just briefed angry MPs that 85% of housing price rises in recent decades were not due to housing supply limits: a conclusion reached by many independent academic

economic analysts and this author in his main technical report. Recent work demonstrates that rising house prices were and are, strongly driven by credit conditions and by 'investment demand' from foreign and domestic investors in 'buy to let' and 'second homes'. The primary problem in the UK is 'diverted supply' not 'suppressed demand'.

9. The ONS 2020(interim) National Population Projections confirm a decreased rate of population growth which is now far below that of the obsolete 2014 based projections. In April 2022 the ONS applied their 2018 HH variant pattern with the latest 2020 (interim) NPPs to provide interim LA level estimates of population growth. For Wirral this analysis gives a 16 year housing need of ~4,040 d. However as the HCLG Select Committee pointed out, all ONS releases so far have not accounted for the impact of the Covid 19 Pandemic (nor fully accounted for the ongoing Brexit impacts). Several academic estimates of the exodus of foreign workers during the pandemic (in 2020) range from 0.5 to 1.3 million. The Office for Budget Responsibility recently used the higher figure to scope out the very significant implications for reduced UK economic growth. Fertility has sharply fallen for example, and 1918-1921 Spanish Flu Pandemic experience suggests it will remain suppressed for several years, below the long term, already falling trend line. Life expectancy peaked several years ago. Despite all this (and government 'strong immigration control' policies) the ONS 2020(interim) 'long term' immigration growth rate assumption is 21% higher than in the ONS 2016 (pre-Brexit, pre-Covid) projections. It seems the ONS does not learn from mistakes. We may reasonably conclude that, although lower than the 2014 release, the 2020 projections are still too high. The 2021 Census, national and LA provisional population and HH numbers, of June 2022, confirms this. Of course, the medium term impact of the need to restructure our energy supply system for economic and strategic security reasons, has certainly not been considered yet.

10. Affordable housing need calculations in the Wirral SHMA 2021 (arc4) have also been examined as these are based on a PPG method completely divorced from the Standard Method for calculating total housing need. The affordability need method is intrinsically unstable. In addition the SHMA uses the now obsolete ONS / MHCLG 2014 based population and HH projections discussed earlier. It also uses a national survey based scaling rate applied to the 2014 projections without justification. It also includes 'need' components which arc4 admit have 'nil impact' on actual need. Using up to date Wirral housing survey data on gross new need (quoted by arc4) and correcting other errors, results in a real affordable housing need of ~ 50 dpa compared with the arc4, 374 dpa estimate (Appendix 8).

11. The long awaited 2021 Census results for local authorities were released on June 28 2022. They showed, as earlier work described above had predicted, Wirral population and HH numbers significantly lower than any of the ONS HH projections since 2012, including the ONS Mid Year Estimates derived from the 2011 census using detailed cohort models. The author's APS based models proved to predict the 2021 Wirral population very closely. Using the APS models and the 2011 and 2021 census data and alternative assumptions, 5 new HH growth forecasts were made. The range obtained was a demographic housing need from 347 to 5,010 d over 16 years with a mean value of 3,162 d lower than the ~4,400 d mean from the earlier set of two dozen scenarios, reflecting the continued, strong decline in national and local growth visible in the ONS HH projections since 2012.

12. In summary : many aspects of the Local Plan are related to the 'mandated' housing number requirement over the plan period (Policy WS1.1). The requirement has been defined by the 2021 Standard Method based on the ONS 2014 Principal population & HH number projections for Wirral. Both the 2014 projections and the Standard Method have been subject to severe technical and political criticism as described earlier. The Office for Statistics Regulation has determined in 2021 that the 2014 projections are unsound and must not be used for planning purposes. The HCLG Select Committee has endorsed the OSR findings. The two planning White Papers in preparation were withdrawn and the HCLG minister sacked. In future, housing requirements must be based on the latest ONS (increasingly local administrative) data and methodology i.e. for now, on a 2021 base. The 2021 census results confirm the continuing decline in UK and local growth and may show some of the effects of the Covid Pandemic and Brexit effects to date. However the 2020/21 exodus of foreign workers may be underestimated. Population & HH number growth rates in successive ONS population projections have fallen steadily since the 2014 release through to the latest 2020 release. Over the last three years the author has developed around two dozen forecasts of Wirral population and HH numbers growth based on ONS Labour Force Survey data, Wirral administrative data sources and the ONS 2018 projection variants (in the Standard Method framework) which show the same pattern. The mean housing requirement estimate was ~ 4,400 d over the 16 year LP compared with the obsolete, ONS 2014 based estimate of 13,360 d. However the latest ONS 2020(interim) NPPs coupled, by them, with their 2018 projection variants indicates a mean housing need of ~4,040 d for Wirral. The 2021 census results confirm the accuracy of the author's ONS APS based forecasts and using this model and the 2011 and 2021 census results with various assumptions, 5 new forecasts were made. These give Wirral demographic housing need, in the Standard Method framework, of 347 d to 5,010 d with a mean of ~3,260 d in 16 years. This is lower than the earlier scenario set mean of ~4,400 d reflecting the continuing deceleration in UK and local population growth rate.

The statistical distribution of the administrative data based forecast scenarios and the new 2021 census based models tells us that the probability of the 13,360 d demographic housing need occurring is zero.

The author and colleagues have kept WMBC officers and senior councillors fully informed of the developing evidence on national and local housing requirements for three years. It would have been possible, while sensibly working to prove that there is sufficient brown field land to accommodate, the original 'mandated' ~12,000 d in 15 years target, and supporting a welcome, Wirral 'regeneration strategy', to also develop contingency plans to adapt to an emerging, much lower housing requirement of ~ 4,400 d. This is 1/3 of the current local plan assumption. Now we have a 2021 Census based mean need of ~3,162 d or 24% of the stated LP need. There is no evidence of any risk assessment, nor of contingency planning by WMBC around this probable large change in a basic driving parameter of the Local Plan: population and HH number growth rate.

Local Plan Policy WS 12 'Monitoring & Review' WLP submission page 126, says

'The Council will monitor the implementation of the LP policies ... Should the results indicate that there is significant failure to meet development trajectories or a change in circumstances that significantly impacts on changes in demand for land the Council will review the LP prior to the relevant five year period for review.'

Appendix 15 lists the indicators prompting a review. These include 'change in total population (estimates and projections): key strategic objective SO2'. The mass of evidence in this report on changing population and HH number projections shows that policy WS 12 should already have been activated, or given that this has not happened before submission despite repeated warnings to the Council, an immediate review , or a main modification, should be ordered at LP Examination in 2023.

The council does address the need for 'flexibility' in sections 4.48 – 4.50 of the Housing Delivery Strategy, May 2022:

	<p>'While not a specific requirement in NPP, the council considers that it is good practice and pragmatic to deduct a percentage of dwellings from the projected LP housing supply to take into account that not all planning permissions or land allocations will ultimately be implemented...a 10% non-implementation rate ...is regarded to represent a suitable and appropriate allowance for the Borough.'</p> <p>This is commendable. However, on demand side uncertainty, where in reality we may experience only 30% of the currently mandated housing requirement, the need for 'flexibility' is not addressed in the Strategy at all. In fact the NPPF does require flexibility in plan making. 'Presumption in favour of sustainable development' notes tell us</p> <p>'11 a) Plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change.'</p> <p>The 'Procedure Guide for Local Plan Examinations' also tells us</p> <p>'1.12. Evidence base documents, especially those relating to development needs...that use data from two or more years before the submission date may be at risk of being overtaken by events, particularly as they may rely on data that is even older. As a minimum any such documents should be updated as necessary to incorporate the most recent available information.'</p> <p>There is no evidence of any consideration of the rapidly changing situation in the reduction of HH number growth rate forecasts and the matter of national and local housing requirements redefinition over the last several years. In particular the Wirral housing requirements are still based on (OSR defined 'obsolete') 2014 based ONS population and HH projections which in turn depend on data going back to 2008 / 2009. The ONS methodology used in the 2014 projections was also described as obsolete by the OSR in 2021. Is the local plan consistent with national policy? Surely the plan must be considered incomplete and unsound as it stands. Has it been positively prepared? Has due regard been given to the impact of both the 'data reality' evidence of Wirral's declining population and HH number growth rates and to the emerging, forced, government recognition of national growth rate declines and of necessary further and severe modifications to the Standard Method?</p>
<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate</p>	

representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Recommended modification for Policy WS1.1 Housing Need : Although WGSA call for a 'Main Modification' regarding issues and consequences around the highly inflated 'Housing Need' figure, this requires much more than a simple edit of the DLP text. The commentary to earlier Questions outlines the magnitude and absolute necessity for modification of the 'Housing Number' and 'Housing Requirement'. This does not detract from our very strong support for the overall, 'Regeneration-led' approach and basis to the Draft Local Plan.</p> <p>Please refer to Professor David Gregg's main report and executive summary for evidence and direction, the latter of which, deconstructs the original para 3.15 et seq.</p> <p>WGSA and Professor Gregg (and other WGSA and allied population and planning experts) would be willing to continue liaising with WMBC in order to reach a realistic 'Housing Need' figure and related other modifications with the intention of completing the exercise in a short period and resulting in a truly 'sound' Local Plan, one which matches the real needs of Wirral.</p>
If your representation is seeking a modification to the plan, do you consider it necessary to participate in	Yes, I wish to participate in hearing session(s)

<p>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>Below I give brief reasoning why I should participate in hearing session(s) as a member of the WGSA Team and then why WGSA should have a participating Team:</p> <p>For over 3 years I have been providing the Council with Reports showing in great detail what the 'Housing Need' should be and why using a whole range of scenarios, changing and alternative methodologies, the errors in their application of the Standard Method, the implications and effects of successive ONS Datasets and Guidance, the flaws and limitations of Reports by those advising the Council and LCR including Liverpool University and the contrasting value of the Companion Report for WMBC by Government Adviser and author of the POP system used by most LAs to calculate Need, Prof Ludi Simpson formerly of Manchester University, whose scenarios and conclusions blend in with my own work and who had offered to join the WGSA Team if required.</p> <p>I have worked on Housing Need issues with experts reviewing the flawed population growth data and consequent 'Housing Need' of Coventry. This led us to contact the OSR (Office of Statistics Regulation, the ONS Regulator) who invited us with others to two workshop Zoom Webinars along with other notable experts and interested LAs. Invited to comment and present further, we were instrumental in the OSR changing their view of ONS reliability which resulted in their production of two damning reports on and call for specific actions by the ONS. The OSR were convinced of our arguments on the consequent overstated population numbers, inflated trends, insufficient guidance in the use of their data, and inflated 'Housing Need' outputs.</p> <p>My attached, detailed Report, running to over one hundred pages and the Executive Summary, I am assured, is clear but complex and its conclusions are fully aligned with the subsequent release of initial 2021 Census Data. I would appreciate the opportunity to present a summary of conclusions, including further findings from later 2021 Census Data releases, and to give any required further clarification,</p> <p>Wirral Green Space Alliance (WGSA) is a consortium of over 30 local campaign groups, representing over 5,000 members who wish the deplorable long-term disparity across the Peninsula to be at last addressed by regeneration of run-down areas of nationally-high deprivation, poor living conditions and adverse health outcomes (including a 10-year shorter life-expectancy), and Wirral's actual Housing Need delivered in this manner together with some further development within other existing urban areas. This action would have the consequential benefit WGSA also seeks in its opposition to unjustified loss of greenspace for development.</p> <p>What WGSA recommends is a positive housing need figure that will support regeneration and levelling up and the desirable consequence of protecting all of Wirral's green space, including Green Belt in Wirral for the benefit of all in the future.</p> <p>WGSA strongly supports the Local Plan Submission Draft to be progressed to adoption; however, it is strongly opposed to the imposition of the vastly inflated housing requirement, which unduly risks Wirral's green space for development in the event that the Council fails the "Housing Delivery Test" in the future, made more likely by the vastly overstated Housing Need, and where greenspace/Green Belt release and development would stall or frustrate the worthy Regeneration and 'levelling-up' agenda.</p> <p>After the 2019 Local Elections, when WGSA actions were largely responsible for both the change of local political control and the Local Plan approach (from mass housebuilding in Green Belt to a Regeneration-led one), the Council announced that it had to listen to and involve WGSA going forward. Throughout all stages since then, WGSA and WMBC have debated progress of the DLP with great success except for formal agreement on the real 'Housing Need'. It would seem to be a natural continuation of our relationship with the Council and the emerging Local Plan, for WGSA to have a small Team participating in hearing session(s) on what has been our major concern.</p> <p>WGSA, in its meetings with the Local Plan Team and local political leaders, had been told that the Local Plan could take on a reduced 'Housing Need' without undue delay or fundamental change. This would also give the Council the 'headroom' to better address and quicker the thousands of 'substandard' Housing Stock units by 'Replacements' on deliverable 'brownfield' sites released from being reserved for exaggerated Demand and developed to better internal and external 'greened-up' space standards.</p> <p>It would like an opportunity to highlight to the Examining Inspector the WGSA case made, which seeks a 'Main Modification' to reduce the Housing Need number, and an early review of the Housing Requirement.</p> <p>The WGSA Team at LP Examination would ideally be headed by WGSA's Barrister Killian Garvey (King's Chamber) and supported by Prof David Gregg (on Housing Need, Air Quality and Heritage), our Wirral & Cheshire Wildlife Rep, Hilary Ash (and/or a Colleague), who has assisted the Council for many years on a voluntary basis with its Environmental Strategies and Policies, and Jackie Copley, our Planning Consultant and representative of CPRE and The Wirral Society, and John Heath (retired Architect and WGSA Founder/Convenor).</p> <p>We support an Adopted Local Plan, with a realistic housing requirement to enable Wirral Council to better steer sustainable development, and in doing so, conserve Wirral's green spaces for the enjoyment and benefit of all in the future.</p>

	At the time of drafting over 22,000 people had signed WGSa petitions saying no to releasing Green Belt land for development – Brownfield First! https://www.change.org/p/councillor-janette-williamson-say-no-to-releasing-wirral-s-green-belt-land-for-development-brownfield-first
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	Yes

Comment ID	LPSD-182
Person ID	1323147
Include files	LPSD-182 McGrath_Redacted.pdf
Consultee Name	Bellway Homes
Position	Land
Company / Organisation	Bellway Homes Ltd
Agent ID	1312385
Agent Name	Joanne McGrath
Position	
Company / Organisation	
Number	Policy WS 4.2
Title	Designated Employment Areas
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS4.2
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>This representation relates to land at Burton's Food, Pasture Road, Moreton, CH46 8SE. A Site location plan is attached to this representation form.</p> <p>Policy WS 4.2 (Designated Employment Areas) seeks to ensure land will be safeguarded within designated Primarily Employment Areas shown on the Policies Map to create and maintain local employment and provide a range and choice of sites and premises in terms of quality, accessibility, type and size.</p> <p>The principle and thrust of this policy is positively prepared however, our client objects to the soundness of policy and the inclusion of the land on the Proposal Map at Burton's Foods given the recent change in its operational status and the development of the adjacent land for 257 dwellings in 2020. This is due to be completed in Summer/Autumn 2024</p>

	<p>The existing buildings on the Site are no longer in use and have been vacant since 1st June 2022. Marketing of the Site is due to commence shortly, however given these buildings are of a similar nature to those which occupied the adjacent site (formerly part of Burton's Foods), it is understood the former industrial buildings are very specific to its previous use and are not capable of any viable conversion. This is supported by ongoing structural investigations and general marketing advice regarding employment needs in this area and across the borough.</p> <p>This assertion is also substantiated with the Council's own Evidence Base – 'Employment Land and Premises Study 2017 [EE2.1] Site Reference 65 -Former Burton Biscuits.</p> <p>The Site proforma concludes the Site (which is now . redeveloped for residential use) had very poor market attractiveness and was constrained by demolition costs for previous B Class uses and therefore should not form part of the Borough's on going employment land supply. It should instead be re-designated as part of the Primary Residential Area unless a continued employment use is secured. This is equivalent to the adjacent land which forms the basis of this representation.</p> <p>More recently, the Wirral Employment Land Options Study [EE1] further reinforces the assertion that sites such as Burton's cannot be considered as part of the available supply for employment uses given such companies are likely to rationalise their operations (para 2.24)</p> <p>In summary, we respectfully request that the remainder of the Burtons site is removed the Proposals Map as a designated employment area. The Site can no longer be considered as part of the available employment supply due to rationalising their operations and vacating the building on site – this approach is consistent with the Council's own evidence base as set out within this representation.</p>
omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the	

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

<p>hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>It would be advantageous to verbally explain the strong planning merits for residential development on the Site to represent the site accurately and provide information as required at EiP to benefit the Inspector.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

Comment ID	LPSD-183
Person ID	1323501
Include files	LPSD-183-EM-Gregg Attach 1807_Redacted.pdf
Consultee Name	Professor David Gregg
Position	Steering Group Member
Company / Organisation	Wirral Green Space Alliance (WGSA)
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Part 3
Title	Strategic Policies
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	Paras 6.79, 6.96 Policy WD 18, Paras 6.97, 2.23 xi, Vision 2037 F, SO 10, Para 3.110, Policies WS 7.2 5, WS 7.5 H, Paras 3.201 iv, 6.2, Policies WD 1.1, WM 4.4 E, Appendices 10.9 and 15B,
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>In commenting on the perceived failings around 'Air Quality', its monitoring and lack of appropriate action, which leads to the conclusion that the Local Plan is 'unsound' in this respect, this is not the start of my discourse with the Council on the subject as a Member and on behalf of WGSA (Wirral Green Space Alliance). I have provided Senior Council Officers and political Leaders of the Administration with technical evidence and advice at several stages of the Local Plan development, with updates as more factors and data came to hand.</p> <p>I have seen no indication that the Council appreciates the serious situation that exists; there are many references to 'Air Quality' within the DLP but no quantified technical detail as to the extent of issues or the action required. There is, however, complacency which could make the Council culpable.</p> <p>I attach the latest version of my full Report on 'Air Quality' but start here with extracts from it:</p> <p>2.6 Conclusions</p>

Considering PM2.5, NO2 and Ozone we must conclude that it is highly likely that the 2022 WHO annual mean limits for these air pollutants will be exceeded on Wirral in most areas during the Local Plan period to 2037 and probably sooner, rather than later, in that period.

The addition of 13,000 new dwellings, (or more realistically 4,000 new dwellings) in this period as AECOM conclude, makes only a marginal impact on the scale of the overall emerging compliance problem faced by WMBC due to the existing population impact, traffic volume growth, and the probable increase in non-traffic emission sources. Despite

the loudly flagged Council 'priority' intention to combat air pollution there is no quantitative assessment of its proposed actions even for the current, highly optimistic AECOM projections. The stated response though, is clearly completely inadequate to deal with the probable developing situation defined in this author's analyses. This situation represents a serious weakness in the WMBC 'Environmental Sustainability' appraisal of the Local Plan and particularly on Air Quality and Health. Please see Appendix 4 for the author's views on the type and scale of responses likely to be necessary and effective, which were formally reported to WMBC in previous draft Wirral LP consultation submissions.

1.1 Executive Summary

1. WMBC have failed to have proper regard for Air Quality issues and consequent health problems. Proposed actions over the LP period are inadequate.

2. Accumulating international clinical evidence on the negative health effects of air pollution is now very clear. Health matters: air pollution – GOV. UK (www.gov.uk) describes the effect of PM2.5 for example in these terms:

'Reducing PM2.5 ...will have a significant benefit on health. A reduction in population exposure in England of just 1 micg / m cubed could prevent 50,000 cases of coronary heart disease, 16,500 strokes, 9,000 cases of asthma and 4,000 lung cancers over 18 years.'

Improving air quality and reducing its health effects should be a priority for local plan makers and WMBC in the Wirral 'Plan Appraisal' acknowledge this while claiming only 'minor negative effects' of the plan. They also say in WD 14, para 6.79:

'It is a priority for the LPA to maintain good air quality, reflected in the wider strategy in this plan... air quality is monitored to ensure the concentrations meet national air quality objectives on pollutant levels.'

This is misleading. Monitoring is minimal. While several thousand additional dwellings may have a marginal effect in comparison with the identified future general growth in pollution levels over the plan period, a Local Plan should be tackling the resulting pollution and overall health problems affecting all the residents, whatever the source. WMBC has repeatedly underestimated the scale of the continuing and developing air pollution / health problems by hiding behind the current 'legal' annual limit obligations. The author has also shown in extensive statistical studies that the prevalence of many diseases correlates with particulate matter levels across all Wirral political wards, confirming the international clinical evidence applies here.

3. The Wirral Environmental Sensitivity Study of spring 2021 included WMBC conclusions about air quality and health over the LP period. It concluded that legal air pollutant annual limits (PMs and NO2) were likely to be exceeded in only a few isolated locations. No quantified plans were therefore 'needed' to address air pollution but tree planting would be increased along with increased encouragement of 'walking and cycling' by residents and a Left Bank Mass Transit System. Lower speed limits were mooted for some streets in urban areas and so on...We suggest these are trivial, un-quantified, actions relative to the clinical health evidence and the likely future air pollution growth demonstrated in this report.

4. The conclusions of 2) were based on the 'Wirral Local Plan Air Quality Study' by the consultants AECOM. However, this report was not made available to residents for the 2021 LP consultation even after FOIA requests. Only limited appraisal of the WMBC air quality forecasts were therefore possible but these raised alarms. The WLPAQS was only released in March 2022, prompting this report for submission to the LP consultation at Regulation 19. The failure to share this key DLP evidence document was reported to the Information Commissioner's Office for consideration.

5. Analyses of the WLPAQS issued in March 2022 raised serious concerns about the narrow geographical scope of the modelling, the selective data used, the technical assumptions made in several areas and the statistical quality of the final models for NO2 and PM2.5. Alternative, transparent, statistical modelling yielded predictions of significant deterioration in air quality with significant areas of Wirral exceeding 2021 WHO annual limits within 5 years.

6. However, AECOM noted in 2021 that the UK government was likely, for example, to adopt the much lower WHO annual limits for the highly dangerous PM2.5s in the new Environment Act. From his reviews of the international medical evidence this author warned WMBC repeatedly, that this was likely happen. In September 2021, faced with the mass of mortality evidence from the Covid 19 Pandemic and the role of air pollutants, the WHO reduced the PM2.5 annual limit from 10 micg / m cubed to 5 micg / m cubed and the NO2 annual limit from 40 micg / m cubed to 10 micg / m cubed. In January 2022, COMEAP gave 'strong' advice to the UK government that the clinical evidence strongly supported a reduction to the new PM2.5 WHO limit or lower. If this new WHO PM2.5 limit of 5 is adopted by the government in the Environment Act, most of Wirral air will be 'illegal'. There could also be a phased limit reduction to 5 micg / m cubed over several years. However new modelling in this report suggests most of Wirral will be above the old WHO10 limit anyway within 5 years. On NO2, at the very least, the government will likely adopt a falling limit from 40 micg / m cubed towards 10, perhaps over a decade because of the scale of the challenge. The Secretary of State has discretionary powers to do this at any time. Given the geographical distribution of current NO2 levels across Wirral even this minimal government response would increase 'illegal' areas from the presently acknowledged 'several locations' to most locations all across Wirral, well within the LP period.

7. It has long been known that air pollutants vary tremendously by time of day, day to day, week to week, seasonally and year to year. This can be seen clearly in the published Wirral continuous AURN station pollutant data. In recent years it has also become abundantly clear that high peaks of air pollutants on shorter time scales, have a devastating impact on acute lung and heart disease. Large scale medical time series analyses have shown very high correlations between such pollution peaks and hospital emergency admissions peaks and

subsequent deaths. For this reason, hiding behind 'legal' mean, annual air pollutant limits can no longer be considered ethically acceptable. Local Authorities will be increasingly challenged in court on these matters, perhaps via GLO actions.

8. Even with the modest AECOM assumptions about future air pollution growth on Wirral they correctly point out that the contribution of ~13,000 new dwellings over the LP period is small compared with the increasing traffic volume from current residents and business (even allowing for electric cars) and, the author would add, from a forced return to gas and coal for power generation for obvious economic and national security reasons, since a nuclear strategy will take many years to implement. The author would add that more realistic predictions of traffic volume growth, electric car substitution rate and much lower housing need estimates (from up-to-date ONS household forecasts and an expected new Standard Method), imply that new housing would constitute an even smaller proportion of air pollution growth over the LP period. (The Wirral housing need, based on ONS Labour Force Survey population and HH data, ONS 2018 variant HH projections, and Wirral administrative data is ~4,300 d over a 16-year period not ~13,360 d.)

9. Based on the above considerations WMBC has failed to appreciate the scale of the air pollution / health problem over the LP period and no scale appropriate mitigation strategy has been put in place, evaluated and quantified. Appendix 4 (Wirral Local Plan: Inadequate Response to Air Quality & Health Issues; D P Gregg; May 2022) examines possible, known to be effective, interventions that councils can, and increasingly do, make. In the LP no attempt has been made to quantify the mitigation impact of the few qualitative proposals so far made to tackle the wrongly assumed 'minor negative effects' on Air Quality, Health and Transport during the Local Plan. WD 14, Pollution & Risks Para 6.82 A, bans development proposals that 'result in an unacceptable increase in the risk to human health and the environment' and also says, 'or leads to the designation of an Air Quality Management Area'. The trends and changes we have identified in this report will lead to both events occurring. Proposals for inaction on this serious matter by the Council in the LP should also be banned.

Policy WD 18, page 267, para 6.96 relates to health impacts of the LP.

'This LP includes a wide range of measures relating to health and wellbeing of residents...in addition... Policy WD 14, Pollution & Risk ... clearly address matters of human health.'

Para 6.97 is pertinent: 'there is a need to identify certain developments for a Health Impact Assessment.' These usually relate to particular residential and industrial developments or 'other developments likely to have a significant impact on health...'

WD 18 B also tells us

'If adverse impacts are identified, proposals will need to demonstrate how these will be addressed.'

The Wirral Local Plan is a 'super-proposal' concerned with the economic and social development of a whole peninsula holding 323,000 residents, over a 16-year period. I suggest WD 18 B should apply properly to the LP itself, given the damage inaction on developing Air Pollution levels will cause to health. The Current Wirral LP Evidence Base under Health, contains HS1, 'Interim Health Impact Assessment of Emerging Wirral Council LP' dating from 2019. On page 13 in discussing life expectancy differences, it recognises that

'In Wirral respiratory causes [of death] (23.8%) are the largest contributing factors, followed by cancer (20.2%)...'

However, it then notes that poor health is linked to deprivation due to 'a higher prevalence of behavioural risk factors'. In other words, the deprived cause their own ill health. Air Pollution exposure is not mentioned in this section on life expectancy. It does later acknowledge that air quality is 'a crucial risk factor for ill health' but follows the party line based on the 2018 AQASR, that there are 'no AQMAs on Wirral' just a few 'hot spots' to be monitored. The Health Impact Assessment is superficial and badly out of date. We are also told, following the Panglossian party line, that

'Cycling, walking or making use of public transport are all important efforts in which the public can help with improving the air quality in Wirral.'

There is no quantification of the up-to-date evidence of harm, nor of the proposed, off the cuff, mitigations. The NPPF requires that

'11 a) Plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change.'

Policy WS 12 'Monitoring & Review' emphasises the importance of monitoring and adaptation.

'The Council will monitor the implementation of the LP policies ... Should the results indicate that there is ... significant change in circumstances the Council will review the LP prior to the relevant five-year period for review.'

Appendix 15 (Monitoring Framework), page 356, lists contextual indicators to be tested including: '14 Changes to Air Quality: Key Strategic Objective SO10' and '49 Number of planning applications granted where significant adverse impacts In Health Impact Assessments are not mitigated.'

The 'Sustainability Appraisal for the Wirral LP: 2021 – 2037' by AECOM, also discusses Monitoring & Mitigation.

'It is important to monitor the predicted effects in a SA as it provides a check on the accuracy of predicted effects and allows for unforeseen effects to be identified...'. However, there are limiting factors such as availability of data collection sources...'

In the case of Air Quality there are just two AURN stations in a limited urban area, for continuous monitoring and data collection across Wirral. During the SA exercise we are also told (page 12) that Mitigation actions were considered

'The Council made several direct changes to the policies in response to the [consultant studies] recommendations. This led to a more positive outcome with regards to the following sustainability topics...'

Changes to eleven major topics are then listed. The list does not include Air Quality nor Health. WMBC have failed to take into account significant future increases in pollution levels, the changes in international evidence on health impacts and the consequent large changes in formal WHO pollution limits, now endorsed strongly by COMEAP. The author suggests that

	<p>opportunities for catching up with significant changes in this matter have repeatedly been missed up to this LP submission point. He suggests that the situation demands the ordering of an immediate review of the Wirral LP on Air Quality / Health or the issuing of a 'main modification' instruction at the LP Inspection in 2023.</p> <p>The author also points to the Procedure Guide for Local Plan Examination section 1.12 on evidence base relevance</p> <p>'1.12. Evidence base documents... that date from two or more years before submission date may be at risk of having been overtaken by events, particularly as they may rely on data that is even older. As a minimum any such documents should be updated as necessary to incorporate the most recent available information.'</p> <p>Given the rapidly developing medical evidence of the last several years, the strong WHO responses in decreasing pollutant limits and the probable near future government responses in the Environment Act, the WMBC LP evidence base must already be considered out of date in the context of a 16-year Local Plan period. In the light of the clear and serious long term health implications, this must surely be unsound and a failure of the council's duty of care to residents and in properly preparing the Local Plan.</p> <p>Further Helpful Note: LP SO10 includes 'maintaining good air quality for good health'. Our analyses show this has not been achieved and will not be achieved as the LP stands. The 2021 WLPAQS modelling of CO2 emissions from roads indicates an increase of 1.464 X between their 2018 baseline and 2037 proxy baseline for the preferred LP option, reflecting traffic volume increase. Even with growth in electric vehicles we show that CO2 (and pollutants) will continue to increase significantly over the LP period. This is not compatible with LP SO1 intent to 'reach net zero carbon locally no later than 2041', nor with LP SO3 which includes 'helping to ensure local travel is largely fossil fuel free by 2030'.</p>
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	<p>My response to Q4B(3) above makes reference to issues within the Sustainability Appraisal and should be taken into account for this section. My full Report regarding 'Air Quality' is also relevant and attached to my response to Q4B(3) above.</p>
If you wish to make a separate representation, relating to legal compliance, soundness or the	

<p>duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Although WGSA call for a 'Main Modification' regarding issues and consequences around 'Air Quality', this requires much more than a simple edit of the DLP text. The commentary to earlier Questions outlines the magnitude and absolute necessity for modification. This does not detract from our very strong support for the overall, 'Regeneration-led' approach and basis to the Draft Local Plan.</p> <p>Please refer to Professor David Gregg's full Report and the 'Conclusions' and 'Executive Summary' extracts given separately earlier for evidence and direction.</p> <p>WGSA and Professor Gregg (and other WGSA and allied population and planning experts) would be willing to continue liaising with WMBC in order to reach an acceptable position regarding 'Air Quality' and related other modifications with the intention of completing the exercise within a short period and resulting in a truly 'sound' Local Plan, one which matches the real needs of Wirral.</p> <p>[NB this includes a measured, mitigation strategy for the plan in respect to Air Quality]</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? * No, I do not wish to participate in</p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>hearing session(s) * 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>Below I give brief reasoning why I should participate in hearing session(s) as a member of the WGSA Team and then why WGSA should have a participating Team:</p> <p>For over 3 years I have been providing the Council with Reports showing in great detail what the true position is on Wirral regarding 'Air Quality' monitoring, legislation and guidance changes and their effects, the critical aspects of Consultant advice to them, and necessary action with timescales and examples from other cities. Regrettably, little appears to have been appreciated and/or proposed which may be a consequence of insufficient expertise within the Council. The outcome is a Local Plan with many qualitative statements of general acceptability, unacceptability and action but no indication of understanding of the seriousness of the situation or its consequences nor any quantified proposals and targets.</p> <p>My attached, detailed Report plus the 'Conclusions' and 'Executive Summary' extracts, I am assured, are clear but complex. I would therefore appreciate the opportunity to present a summary of the situation and conclusions, and to give any further clarification required.</p> <p>Wirral Green Space Alliance (WGSA) is a consortium of over 30 local community, environmental, preservation and campaign groups, representing over 5,000 members who wish the deplorable long-term disparity across the Peninsula to be at last addressed by regeneration of run-down areas of nationally-high deprivation, poor living conditions and adverse health outcomes (including a 10-year shorter life-expectancy) and 'Air Quality' improvements to support such health outcomes.</p> <p>WGSA strongly supports the Local Plan Submission Draft to be progressed to adoption; however, it is strongly opposed to the imposition of the vastly inflated housing requirement and deplores the apparent complacency regarding 'Air Quality'.</p> <p>After the 2019 Local Elections, when WGSA actions were largely responsible for both the change of local political control and the Local Plan approach (from mass housebuilding in Green Belt to a Regeneration-led one), the Council announced that it had to listen to and involve WGSA going forward. Throughout all stages since then, WGSA and WMBC have debated progress of the DLP with great success except for formal agreement on the real 'Housing Need' and 'Air Quality' matters. It would seem to be a natural continuation of our relationship with the Council and the emerging Local Plan, for WGSA to have a small Team participating in hearing session(s) on what have been our major concerns.</p> <p>WGSA and I in particular would like the opportunity to highlight to the Examining Inspector the WGSA case, which seeks a 'Main Modification' to better recognise and address the poor position regarding 'Air Quality' within the DLP.</p> <p>The WGSA Team at LP Examination would ideally be headed by WGSA's Barrister Killian Garvey (King's Chamber) and supported by Prof David Gregg (on Housing Need, Air Quality and Heritage), our Wirral & Cheshire Wildlife Rep, Hilary Ash (and/or a Colleague), who has assisted the Council for many years on a voluntary basis with its Environmental Strategies and Policies, and Jackie Copley, our Planning Consultant and representative of CPRE and The Wirral Society, and John Heath (retired Architect and WGSA Founder/Convenor).</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). * Yes * No</p>	<p>Yes</p>

Comment ID	LPSD-184
Person ID	1237546
Include files	
Consultee Name	Dr Hilary Ash
Position	Hon Conservation Officer
Company / Organisation	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 5.4
Title	Ecological Networks
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	MPA-RA5.1

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Some brownfield sites, especially where long-abandoned, have wildlife value. The Plan should make clear that the full mitigation hierarchy and Biodiversity Net Gain must be applied to all sites, whether brownfield or greenfield.

<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</p>	<p>3.6 We support 'brownfield first' development, because the Green Belt contains so many LWS and SSSIs, and the necessary wildlife corridors and connections between them. As we found in the 2018 Green Belt review, there is little Green Belt in Wirral that does not have wildlife importance (out of its 54 parcels, 41 had serious wildlife implications and another 7 wildlife-related concerns). However, some brownfield sites, especially where long-abandoned, have wildlife value. See www.gov.uk/guidance/natural-environment about Brownfield land of high environmental value. Therefore the Plan should make clear that the full mitigation hierarchy and Biodiversity Net Gain must be applied to all sites, whether brownfield or greenfield. This necessitates good ecological studies, as the biodiversity value of brownfield sites often includes value to invertebrates. Hind Street (4.85, MPA-RA5.1)and Rose Brae (RES-RA3.4)re-development areas are examples, as the satellite photos show vegetation on parts of the sites.</p>

<p>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Similarly MPA-RA6.3 Bidston Dock will need to take into account the high biodiversity of the western part of the sidings, where surveys have found rare plants and lizards. BNG here could include making the narrow western part of the sidings, of little use for built development, into a suitable-managed nature park.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>No, I do not wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-185
Person ID	1323510
Include files	LPSD-185-PDF-Williams-1407-Redacted.pdf
Consultee Name	Mr Malcolm Williams
Position	Representative
Company / Organisation	Residents of Townfield Road, West Kirby
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 10.6
Title	Open Space
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	LGS-SA6.3

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	WIRRAL LOCAL PLAN 2021- 2037 SUBMISSION IN SUPPORT OF THE LOCAL GREEN SPACE DESIGNATION LGS-SA6.3 FOR 'GREENFIELDS' WEST KIRBY
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	

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

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

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

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

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-186
Person ID	1237546
Include files	
Consultee Name	Dr Hilary Ash
Position	Hon Conservation Officer
Company / Organisation	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 5.2
Title	Open Space Provision
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	3.108 to 3.112, Fig 3.5, 3.118 and 3.121
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	All development to contribute to open space (no size floor) is good – we support. BUT ineffective because nothing about quality of that open space except a vague ‘appropriate quality’ in 3.118.

<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</p>	<p>We support 3.108 to 3.112, Fig 3.5, 3.118 and 3.121. Policy WS5.2 should say that open space will be of high quality, with naturalistic areas wherever possible, or refer to Policy WS 5.1 about quality. Naturalistic areas give greater benefits to physical and mental health especially in children (as said in 3.116). Such areas can also help with provision of Biodiversity Net Gain and Ecological Networks.</p>

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-187
Person ID	1237546
Include files	
Consultee Name	Dr Hilary Ash
Position	Hon Conservation Officer
Company / Organisation	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WP 5.1
Title	Residential Sites
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	RES-SA5.1

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

<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	<p>These sites are adjacent to the R. Birkett and greater protection and enhancement of biodiversity are needed.</p>
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</p>	<p>Site RES-SA5.1 East of Typhoo, Reeds Lane, Leasowe. This site is currently mostly greenfield and adjoins the River Birkett, which is an important wildlife corridor for bats, probably water voles, and other wildlife.</p> <p><i>C reads: provide and promote wildlife corridors into existing local woodland within the site and along the River Birket; Change to `retain wildlife assets including woodland and wildlife corridors and promote wildlife corridors into the existing local woodland within the site and along the River Birket. This is to make it clear that in this instance off-site compensation is unlikely to be acceptable, and a very high standard of open space is expected.</i></p>

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

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

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

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

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

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

Comment ID	LPSD-188
Person ID	1237771
Include files	LPSD-188-189-EM-Clarke-2605-Att1-Redacted.pdf LPSD-188-189-EM-Clarke-2605-Att3-Redacted.pdf LPSD-188-189-EM-Clarke-2605-Att2-Redacted.pdf LPSD188-189-EM-Clarke-2605_Redacted.pdf
Consultee Name	Mr Terence Clarke
Position	
Company / Organisation	Residents(other than of Grange Hall) of Grange Old Road
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WP 6.3
Title	Residential Sites
To which part of the Local Plan does this representation relate?	Policy
* Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WP 6.3

Please state which Site ID/Reference this representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is	please see attachment for full details. ...It is a matter of great concern to us and we expect the residents of West Kirby and the Public who frequent Grange Hill and its surroundings that the Council have included in its draft 2021-2037 Plan its proposal that the land in question is used for housing development. We confirm our strong objections for the many reasons we have submitted in our representations on the 2020-2025 Plan to the Council's proposal.

<p>unsound. Please be as precise as possible.</p>	<p>The 2021-37 Plan is also noticeable for the fact that land on Rectory Road and the A540/Grange Road is not (as it was in the 2020-25 Plan) included for housing development because, we are informed on reliable authority, it has been Designated "Green Space".</p> <p>. The Council had a duty under the NPPF and its criteria for LGS to designate the land in question as Green Space. Part of the land in question, shown on the third exhibit/attachment SHLAA 3009 is, by way of the restrictive covenant on it, available for Public access. Even if the remaining land which is also subject to a restrictive covenant is not available to the public it does not, under the NPPF criteria detract from it being designated Green Space.</p> <p>The land in question also meets all other criteria for formal designation as Green Space including</p> <ol style="list-style-type: none"> 1. Reasonably close proximity to the community it serves 2 Demonstrably special to the local community including because of its Beauty, Historic Significance, Tranquillity, Richness of Wildlife(surrounded by a Local Wildlife Site) 3 Local in character, not an extensive tract of land <p>Even if the land in question has not already been designated by the Council as LGS it complies with all the criteria to be so designated.</p> <p>We hereby make formal Application to the Council to designate the land in question as " Local Green Space". The provisions of the NPPF once are such that once designated LGS the land in question is subject to the same strong development restrictions as Green Belt and housing development is ruled out. The Council should then delete its proposal from its 2021-37 Local Plan that the land in question be used, for housing development.</p> <p>We also attach hereto as evidence the Conveyance which includes the restrictive covenants, a Heritage Statement on the proposed remembrance garden at the War Memorial which overlooks the land in question and which also provides evidence that the land in question meets the criteria for it to be designated as "Local Green Space".</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	

<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Designate RES SA 6.4 as Local Green Space</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to</p>	

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

LPSD-189

Comment ID	LPSD-189
Person ID	1237771
Include files	LPSD188-189-EM-Clarke-2605_Redacted.pdf LPSD-188-189-EM-Clarke-2605-Att2-Redacted.pdf LPSD-188-189-EM-Clarke-2605-Att3-Redacted.pdf LPSD-188-189-EM-Clarke-2605-Att1-Redacted.pdf
Consultee Name	Mr Terence Clarke
Position	
Company / Organisation	Residents(other than of Grange Hall) of Grange Old Road
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 10.6
Title	Open Space
To which part of the Local Plan does this representation relate?	Policy
* Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 10.6

Please state which Site ID/Reference this representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is	please see attachment for full details. ...It is a matter of great concern to us and we expect the residents of West Kirby and the Public who frequent Grange Hill and its surroundings that the Council have included in its draft 2021-2037 Plan its proposal that the land in question is used for housing development. We confirm our strong objections for the many reasons we have submitted in our representations on the 2020-2025 Plan to the Council's proposal.

<p>unsound. Please be as precise as possible.</p>	<p>The 2021-37 Plan is also noticeable for the fact that land on Rectory Road and the A540/Grange Road is not (as it was in the 2020-25 Plan) included for housing development because, we are informed on reliable authority, it has been Designated "Green Space".</p> <p>. The Council had a duty under the NPPF and its criteria for LGS to designate the land in question as Green Space. Part of the land in question, shown on the third exhibit/attachment SHLAA 3009 is, by way of the restrictive covenant on it, available for Public access. Even if the remaining land which is also subject to a restrictive covenant is not available to the public it does not, under the NPPF criteria detract from it being designated Green Space.</p> <p>The land in question also meets all other criteria for formal designation as Green Space including</p> <ol style="list-style-type: none"> 1. Reasonably close proximity to the community it serves 2 Demonstrably special to the local community including because of its Beauty, Historic Significance, Tranquillity, Richness of Wildlife(surrounded by a Local Wildlife Site) 3 Local in character, not an extensive tract of land <p>Even if the land in question has not already been designated by the Council as LGS it complies with all the criteria to be so designated.</p> <p>We hereby make formal Application to the Council to designate the land in question as " Local Green Space". The provisions of the NPPF once are such that once designated LGS the land in question is subject to the same strong development restrictions as Green Belt and housing development is ruled out. The Council should then delete its proposal from its 2021-37 Local Plan that the land in question be used, for housing development.</p> <p>We also attach hereto as evidence the Conveyance which includes the restrictive covenants, a Heritage Statement on the proposed remembrance garden at the War Memorial which overlooks the land in question and which also provides evidence that the land in question meets the criteria for it to be designated as "Local Green Space".</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	

<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Designate RES SA 6.4 as Local Green Space</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to</p>	

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

Comment ID	LPSD-190
Person ID	1237546
Include files	
Consultee Name	Dr Hilary Ash
Position	Hon Conservation Officer
Company / Organisation	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WP 1.2
Title	Residential Sites
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	RES-SA1.3

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

<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</p>	<p>RES-SA1.2 Land at Gibson House-</p> <p>RES-SA1.3 Rear of Gibson House, Maddock Road Egremont</p> <p>The construction for both will involve levelling off some of the slope to the Prom to allow the construction thus reducing the embankment. The steep embankment presently is grassland with a tarmac path across. There is also a pedestrian access from Blenheim Road to the prom which needs reinstating and maintenance. There is a moderately diverse grassland on the mown slope. Plans should retain this grassland and manage appropriately.</p>

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

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

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

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

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

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

Comment ID	LPSD-191
Person ID	1240843
Include files	LPSD-191, 644-647, 650-651-LE-Simpson Form 0407_Redacted.pdf LPSD-191, 644-7, 650-1-Simpson Attach_Redacted
Consultee Name	Phil Simpson
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 1.1
Title	Homes
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS1.1
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Natural Wirral believe that the Council is using the outdated 2014 methodology, therefore the housing figures put forward for Wirral are incorrect. The Local Plan section on Housing should now be recalculated by Wirral Borough Council regeneration strategy to acquire a more realistic approach. For many years, Natural Wirral, Greasby Greenbelt Action Group have been challenging the Council on the figures they are projecting, when their OWN calculations give a totally different figure. Thousands of Wirral residents have approached Natural Wirral to support us in our claims.

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

<p>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>We at Natural Wirral believe that the Local Plan to be unsound and unjustified.</p> <p>We would welcome the opportunity to a hearing session with the Planning Inspector to explain our case. We believe that the Planning laws should be changed and we work to that end. We are a designated area of the greenbelt, one of just 14 in the country. We are but an island.</p> <p>We appreciate that the Inspector may not be fully conversant with our Peninsula.</p>

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-192
Person ID	1243700
Include files	LPSD-192-PDF-Lowsby-1807-Redacted.pdf
Consultee Name	Mr Graham Lowsby
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Part 1
Title	Introduction and Background
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	Part 1 Introduction and Background
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

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

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

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

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

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

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

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

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

Comment ID	LPSD-193
Person ID	1237771
Include files	LPSD-193-EM-Clarke-17.05-Redacted.pdf LPSD-193-EM-Clarke-17.05-A-Redacted.pdf
Consultee Name	Mr Terence Clarke
Position	
Company / Organisation	Residents(other than of Grange Hall) of Grange Old Road
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WP 6.3
Title	Residential Sites
To which part of the Local Plan does this representation relate?	Policy
* Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WP 6.3
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective
Please give details of why you consider the Local Plan is unsound. Please be	We have studied your proposal in the Local Plan to again include the land, which is the subject of restrictive covenants, owned by the occupant at Grange Hall (you have misrepresented the land as Grange Hall Farm) to which the Council have given an ID of RES-SA6.4 (the Council's previous ID being SHLAA 3009 and 0916) for housing development with an "approximate dwelling capacity" of 35 - its noticeable you have not specified the number of dwellings which your 2020 - 2025 Plan had specified as 18

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

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

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

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

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

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

Comment ID	LPSD-194
Person ID	1323501
Include files	LPSD-194-Gregg_Redacted.pdf
Consultee Name	Professor David Gregg
Position	Steering Group Member
Company / Organisation	Wirral Green Space Alliance (WGSA)
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 1.1
Title	Homes
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	Para 3.15 to 3.21 Housing Need and Exceptional Circumstances, and Policy WS 1.1 Parts B and C + related Paras
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>This 'Representation' follows and is related to my earlier one which was centred on the inflated 'Housing Need' but is this time centred on 'Exceptional Circumstances' which should have led to the Council using an alternative methodology and datasets to assess 'Housing Need'. It will show that reliance upon Reports by Liverpool University and others was critically flawed. In addition to the grounds for 'Exceptional Circumstances' set out by myself, there is more justification given within the separate 'Representations' of WGSA colleagues (and others) notably John Heath, the WGSA co-founder and Convenor.</p> <p>Prof Gregg Rebuttal of Liverpool University Report on 'Exceptional Circumstances'</p> <p>The Council appointed Liverpool University to consider whether there were grounds for 'exceptional circumstances' to adopt an 'alternative' method and datasets to calculate 'Housing Need'. The prior advice to the Council had been, we are advised, not to seek to use an alternative method and dataset. Liverpool University then produced a Report based upon a</p>

	<p>self-derived, very limited definition of 'Exceptional Circumstances' based on a narrow and flawed statistical single parameter when 'Exceptional Circumstances' has no set or narrow definition and the Liverpool University approach has been shown by Prof David Gregg to be both critically limited and flawed.</p> <p>Had the Council had independent scrutiny of the reports of Prof Gregg and other members of WGSA, the conclusion would have been that there ARE 'exceptional circumstances' to use an alternative methodology and datasets to establish 'Housing Need' and the Draft Local Plan may well have been 'sound' had the Council acted upon that conclusion. As it is, it is not 'sound' and time and money needs to be expended with a 'Main Modification' to adjust downwards the 'Housing Need' and all that relates to it. However, the former Head of Planning on several occasions confirmed to WGSA that a reduction of the 'Housing Need' figure could be accommodated without significant problems or delay.</p> <p>The reader is referred to the attached Report by Prof David Gregg and to the 'Representations' on 'Exceptional Circumstances' and 'Housing Need' by John Heath, the WGSA Founder/Convenor and Planning Rep for ITPAS (Irby, Thurstaston & Pensby Amenity Society). ITPAS 'Representations' address several non-statistical (as well as statistical) grounds for there being 'Exceptional Circumstances' and concludes that there undoubtedly are, which assertion has had legal backing.</p> <p>Prof. David Gregg holds that the Liverpool University report claims to show two things:</p> <ol style="list-style-type: none"> 1. That in terms of the outcomes from, and input variables to, the mandated ONS 2014 based household projections, Wirral is statistically 'typical' of UK local authorities and that therefore there are 'no local exceptional circumstances' to justify rejecting the 2014 based housing need outcome. We have shown that this self-defined criterion is demonstrably denied by the data evidence that LU present to us and is anyway irrelevant. 2. That the new ONS 2018 based projections are in agreement with the mandated ONS 2014 based projections by 2035 and that as a result, using the latter 2014 projections 'results in no material difference for planning purposes'. We have shown that this conclusion is demonstrably false using the standard method and current ONS technical and procedural recommendations. <p>Along the way LU have made many other assertions which we have shown are false in the main text and appendices.</p> <p>Please refer to my attached full Paper entitled 'Liverpool University 2 Final DPG Comments 14th July 2020'.</p>
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	

<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Recommended modification for Policy WS1.1 Housing Need : Although WGSA call for a 'Main Modification' regarding issues and consequences around the highly inflated 'Housing Need' figure, this requires much more than a simple edit of the DLP text. The commentary to earlier Questions outlines the magnitude and absolute necessity for modification of the 'Housing Number' and 'Housing Requirement' justified by grounds including the clear fact that there ARE 'Exceptional Circumstances' to assess the true 'Housing Need' using an alternate methodology and up-to-date datasets. This does not detract from our very strong support for the overall, 'Regeneration-led' approach and basis to the Draft Local Plan.</p> <p>Please refer to Professor David Gregg's main report and executive summary for evidence and direction regarding 'Housing Need', the latter of which, deconstructs the original para 3.15 et seq., and the separate Paper on the failure of the Liverpool University Report (LU2) to justify there NOT being 'Exceptional Circumstances'.</p> <p>WGSA and Professor Gregg (and other WGSA and allied population and planning experts) would be willing to continue liaising with WMBC in order to reach a realistic 'Housing Need' figure and related other modifications with the intention of completing the exercise in a short period and resulting in a truly 'sound' Local Plan, one which matches the real needs of Wirral.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to</p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>Below I give brief reasoning why I should participate in hearing session(s) as a member of the WGSA Team and then why WGSA should have a participating Team:</p> <p>For over 3 years I have been providing the Council with Reports showing in great detail what the 'Housing Need' should be and why using a whole range of scenarios, changing and alternative methodologies, the errors in their application of the Standard Method, the implications and effects of successive ONS Datasets and Guidance, the flaws and limitations of Reports by those advising the Council and LCR including Liverpool University and the contrasting value of the Companion Report for WMBC by Government Adviser and author of the POP system used by most LAs to calculate Need, Prof Ludi Simpson formerly of Manchester University, whose scenarios and conclusions blend in with my own work and who had offered to join the WGSA Team if required.</p> <p>I have worked on Housing Need (and 'Exceptional Circumstances') issues with experts reviewing the flawed population growth data and consequent 'Housing Need' of Coventry. This led us to contact the OSR (Office of Statistics Regulation, the ONS Regulator) who invited us with others to two workshop Zoom Webinars along with other notable experts and interested LAs. Invited to comment and present further, we were instrumental in the OSR changing their view of ONS reliability which resulted in their production of two damning reports on and call for specific actions by the ONS. The OSR were convinced of our arguments on the consequent overstated population numbers, inflated trends, insufficient guidance in the use of their data, and inflated 'Housing Need' outputs.</p> <p>My full detailed Report (attached to my earlier 'Representation'), running to over one hundred pages and the Executive Summary, I am assured, are clear but complex and their conclusions are fully aligned with the subsequent release of initial 2021 Census Data. The separate Paper attached to this 'Representation' clearly sets out in great detail the mainly statistical case for there being the necessary</p>

'Exceptional Circumstances'). I would appreciate the opportunity to present a summary of conclusions and to give any required further clarification sought.

Wirral Green Space Alliance (WGSA) is a consortium of over 30 local campaign groups, representing over 5,000 members who wish the deplorable long-term disparity across the Peninsula to be at last addressed by regeneration of run-down areas of nationally-high deprivation, poor living conditions and adverse health outcomes (including a 10-year shorter life-expectancy), and Wirral's actual Housing Need delivered in this manner together with some further development within other existing urban areas. This action would have the consequential benefit WGSA also seeks in its opposition to unjustified loss of greenspace for development.

What WGSA recommends is a positive housing need figure that will support regeneration and levelling up and the desirable consequence of protecting all of Wirral's green space, including Green Belt in Wirral for the benefit of all in the future.

WGSA strongly supports the Local Plan Submission Draft to be progressed to adoption; however, it is strongly opposed to the imposition of the vastly inflated housing requirement, which unduly risks Wirral's green space for development in the event that the Council fails the "Housing Delivery Test" in the future, made more likely by the vastly overstated Housing Need, and where greenspace/Green Belt release and development would stall or frustrate the worthy Regeneration and 'levelling-up' agenda.

After the 2019 Local Elections, when WGSA actions were largely responsible for both the change of local political control and the Local Plan approach (from mass housebuilding in Green Belt to a Regeneration-led one), the Council announced that it had to listen to and involve WGSA going forward. Throughout all stages since then, WGSA and WMBC have debated progress of the DLP with great success except for formal agreement on the real 'Housing Need'. It would seem to be a natural continuation of our relationship with the Council and the emerging Local Plan, for WGSA to have a small Team participating in hearing session(s) on what has been our major concern.

WGSA, in its meetings with the Local Plan Team and local political leaders, had been told that the Local Plan could take on a reduced 'Housing Need' without undue delay or fundamental change. This would also give the Council the 'headroom' to better address and quicker the thousands of 'substandard' Housing Stock units by 'Replacements' on deliverable 'brownfield' sites released from being reserved for exaggerated Demand and developed to better internal and external 'greened-up' space standards.

It would like an opportunity to highlight to the Examining Inspector the WGSa case made, which seeks a 'Main Modification' to reduce the Housing Need number, and an early review of the Housing Requirement.

The WGSa Team at LP Examination would ideally be headed by WGSa's Barrister Killian Garvey (King's Chamber) and supported by Prof David Gregg (on Housing Need, Air Quality and Heritage), our Wirral & Cheshire Wildlife Rep, Hilary Ash (and/or a Colleague), who has assisted the Council for many years on a voluntary basis with its Environmental Strategies and Policies, and Jackie Copley, our Planning Consultant and representative of CPRE and The Wirral Society, and John Heath (retired Architect and WGSa Founder/Convenor).

We support an Adopted Local Plan, with a realistic housing requirement to enable Wirral Council to better steer sustainable development, and in doing so, conserve Wirral's green spaces for the enjoyment and benefit of all in the future.

At the time of drafting over 22,000 people had signed WGSa petitions saying no to releasing Green Belt land for development – Brownfield First! <https://www.change.org/p/councillor-janette-williamson-say-no-to-releasing-wirral-s-green-belt-land-for-development-brownfield-first>

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

Yes

Comment ID	LPSD-195
Person ID	1237546
Include files	
Consultee Name	Dr Hilary Ash
Position	Hon Conservation Officer
Company / Organisation	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 7.1
Title	Design Principles
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS7.1
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>Policy WS7.1, B8. 'Provide for the protection of trees of greatest visual or wildlife value and other vigorous healthy trees, and hedgerows;' This is ineffective because will lead to arguments over what is of greatest value and what is healthy.</p> <p>The wording 'of greatest visual and wildlife value' is dubious – nearly all trees and hedges have some wildlife value! We propose remove this wording as likely to lead to disputes over the wildlife value of trees and hedges, or to selecting only a very few trees of 'greatest value' and downgrading the rest.</p>

<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</p>	<p>If this wording is retained, 'healthy' trees should be defined. It could be claimed that a tree with minor vandal damage is 'unhealthy'. Mature trees provide many benefits in carbon fixation, air quality, water management etc. It takes at least a decade for newly-planted young trees to contribute significantly to these ecosystem services. Similarly biodiversity value increases with age and in particular with features such as holes and branch splits which can be regarded as signs of being 'unhealthy'– though they are not. It should also be noted that standing dead wood is of great value to biodiversity, and should be retained if safe to do so. It would be better to remove the word 'healthy' altogether, as it is likely to cause disagreements.</p> <p>Policy could say that 'Trees in classes A,B and C (as assessed in surveys done to BS5837:2012 Trees in Relation to Design, Demolition and Construction and any future updates) should be retained.' However, no standard exists for hedgerows. To align with the Wirral Trees, Woodlands and hedgerows Strategy, we suggested a new text: protect all trees and hedgerows,</p>

<p>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>recognising their value for visual amenity, wildlife, pollution control, noise reduction, climate amelioration and other ecosystem services, unless the trees are already failing and have an expected life span of less than a decade.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	

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

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

Comment ID	LPSD-196
Person ID	1237546
Include files	
Consultee Name	Dr Hilary Ash
Position	Hon Conservation Officer
Company / Organisation	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 5.4
Title	Ecological Networks
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	RES-RA3.4

<p>Please state which Policies Map (Inset Map number(s)) this representation relates to.</p>	
<p>Legally compliant * Yes * No</p>	
<p>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</p>	
<p>Sound * Yes * No</p>	No
<p>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</p>	
<p>If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy</p>	Not Effective
<p>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</p>	Some brownfield sites, especially where long-abandoned, have wildlife value. The Plan should make clear that the full mitigation hierarchy and Biodiversity Net Gain must be applied to all sites, whether brownfield or greenfield.

<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</p>	<p>3.6 We support 'brownfield first' development, because the Green Belt contains so many LWS and SSSIs, and the necessary wildlife corridors and connections between them. As we found in the 2018 Green Belt review, there is little Green Belt in Wirral that does not have wildlife importance (out of its 54 parcels, 41 had serious wildlife implications and another 7 wildlife-related concerns). However, some brownfield sites, especially where long-abandoned, have wildlife value. See www.gov.uk/guidance/natural-environment about Brownfield land of high environmental value. Therefore the Plan should make clear that the full mitigation hierarchy and Biodiversity Net Gain must be applied to all sites, whether brownfield or greenfield. This necessitates good ecological studies, as the biodiversity value of brownfield sites often includes value to invertebrates. Hind Street (4.85, MPA-RA5.1)and Rose Brae (RES-RA3.4)re-development areas are examples, as the satellite photos show vegetation on parts of the sites.</p>

<p>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Similarly MPA-RA6.3 Bidston Dock will need to take into account the high biodiversity of the western part of the sidings, where surveys have found rare plants and lizards. BNG here could include making the narrow western part of the sidings, of little use for built development, into a suitable-managed nature park.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>No, I do not wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-197
Person ID	1237546
Include files	
Consultee Name	Dr Hilary Ash
Position	Hon Conservation Officer
Company / Organisation	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 5.4
Title	Ecological Networks
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	MPA-RA6.3 Bidston Dock

<p>Please state which Policies Map (Inset Map number(s)) this representation relates to.</p>	
<p>Legally compliant * Yes * No</p>	
<p>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</p>	
<p>Sound * Yes * No</p>	No
<p>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</p>	
<p>If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy</p>	Not Effective
<p>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</p>	Some brownfield sites, especially where long-abandoned, have wildlife value. The Plan should make clear that the full mitigation hierarchy and Biodiversity Net Gain must be applied to all sites, whether brownfield or greenfield.

<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</p>	<p>3.6 We support 'brownfield first' development, because the Green Belt contains so many LWS and SSSIs, and the necessary wildlife corridors and connections between them. As we found in the 2018 Green Belt review, there is little Green Belt in Wirral that does not have wildlife importance (out of its 54 parcels, 41 had serious wildlife implications and another 7 wildlife-related concerns). However, some brownfield sites, especially where long-abandoned, have wildlife value. See www.gov.uk/guidance/natural-environment about Brownfield land of high environmental value. Therefore the Plan should make clear that the full mitigation hierarchy and Biodiversity Net Gain must be applied to all sites, whether brownfield or greenfield. This necessitates good ecological studies, as the biodiversity value of brownfield sites often includes value to invertebrates. Hind Street (4.85, MPA-RA5.1)and Rose Brae (RES-RA3.4)re-development areas are examples, as the satellite photos show vegetation on parts of the sites.</p>

<p>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Similarly MPA-RA6.3 Bidston Dock will need to take into account the high biodiversity of the western part of the sidings, where surveys have found rare plants and lizards. BNG here could include making the narrow western part of the sidings, of little use for built development, into a suitable-managed nature park.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>No, I do not wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-198
Person ID	1237546
Include files	
Consultee Name	Dr Hilary Ash
Position	Hon Conservation Officer
Company / Organisation	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 5.4
Title	Ecological Networks
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	3.6
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

<p>Please state which Policies Map (Inset Map number(s)) this representation relates to.</p>	
<p>Legally compliant * Yes * No</p>	
<p>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</p>	
<p>Sound * Yes * No</p>	No
<p>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</p>	
<p>If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy</p>	Not Effective
<p>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</p>	Some brownfield sites, especially where long-abandoned, have wildlife value. The Plan should make clear that the full mitigation hierarchy and Biodiversity Net Gain must be applied to all sites, whether brownfield or greenfield.

<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</p>	<p>3.6 We support 'brownfield first' development, because the Green Belt contains so many LWS and SSSIs, and the necessary wildlife corridors and connections between them. As we found in the 2018 Green Belt review, there is little Green Belt in Wirral that does not have wildlife importance (out of its 54 parcels, 41 had serious wildlife implications and another 7 wildlife-related concerns). However, some brownfield sites, especially where long-abandoned, have wildlife value. See www.gov.uk/guidance/natural-environment about Brownfield land of high environmental value. Therefore the Plan should make clear that the full mitigation hierarchy and Biodiversity Net Gain must be applied to all sites, whether brownfield or greenfield. This necessitates good ecological studies, as the biodiversity value of brownfield sites often includes value to invertebrates. Hind Street (4.85, MPA-RA5.1)and Rose Brae (RES-RA3.4)re-development areas are examples, as the satellite photos show vegetation on parts of the sites.</p>

<p>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Similarly MPA-RA6.3 Bidston Dock will need to take into account the high biodiversity of the western part of the sidings, where surveys have found rare plants and lizards. BNG here could include making the narrow western part of the sidings, of little use for built development, into a suitable-managed nature park.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>No, I do not wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-199
Person ID	1237546
Include files	
Consultee Name	Dr Hilary Ash
Position	Hon Conservation Officer
Company / Organisation	Wirral Wildlife, about 1000 members in Wirral. Wirral Wildlife is the Wirral group of Cheshire Wildlife Trust and was founded in 1971. In 2017 we were awarded the Queens Award for Voluntary service
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 5.4
Title	Ecological Networks
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS5.4
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Policy WS 5.4 needs to add something about including effects of development on neighbouring land, when assessing Biodiversity Net Gain.

<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</p>	<p>We support 3.122-3.129 and Policy WS5.4, but should add that when assessing Biodiversity Net Gain, effects of a development on adjacent land must be considered where that land has value for biodiversity. Appropriate buffer zones may be needed (see Policy WD 3).</p> <p>Figure 3.8 has SBIs and LWS marked, but there is no explanation anywhere in the Plan about the relationship between these. LWS is defined in the Glossary, SBI is not. This must be explained.</p>

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-200
Person ID	1237771
Include files	LPSD-200&206-EM-Clarke-31.05-Redacted.pdf
Consultee Name	Mr Terence Clarke
Position	
Company / Organisation	Residents(other than of Grange Hall) of Grange Old Road
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WP 6.3
Title	Residential Sites
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	RES SA 6.4

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	for full details see attachment. We confirm we are totally opposed to the Council's irresponsible proposal to include the Land in question in its Local Plan 2021-37 for Housing Development.

<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</p>	<p>Designate RES SA 6.4 as Local Green Space</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**