

Comment ID	LPSD-201
Person ID	1312388
Include files	
Consultee Name	Stretton Estates Queensferry Ltd
Position	Land
Company / Organisation	Satplan
Agent ID	1312385
Agent Name	Joanne McGrath
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	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 Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>These representations relate specifically to land off Lowfields Avenue/Kingsley Avenue.</p> <p>The Site is in single ownership. The Site Owner is an experienced land promoter with a proven track record in the delivery of housing deliverable Sites. Several house builders have already expressed serious interest in purchasing the Site for the immediate delivery of family housing. The Site has previously been promoted throughout the Development Plan Document process and has previously been identified as a potential Site for release from the Green Belt and is included within the SHLAA (SHLAA ref 930).</p> <p>The Councils preferred approach is to seek to meet its housing needs within the existing urban area, developing brownfield sites ahead of any Green Belt Release. This approach is admirable (and in line with NPPF) but unrealistic and unachievable.</p> <p>The draft Local Plan sets a housing requirement of 13,360 net additional dwellings over the</p>

	<p>plan period (2021-2037) which equates to 835 dwellings per annum [dpa].</p> <p>The Policy outlines the housing requirement will be delivered through:</p> <ul style="list-style-type: none"> • The creation of new neighbourhoods through brownfield development • As part of the Regeneration Areas across the Borough, including those within Birkenhead • Through the reuse of land previously allocated for employment use, including at Bromborough • Suitable sites within settlement area <p>The Local Plan designates 11 Regeneration Areas across the Settlement Areas of the Borough.</p> <p>The Regeneration Areas seek to deliver a significant proportion of planned growth over the plan period. Eight of these Regeneration Areas are located in the Birkenhead Regeneration Framework area. The three remaining are designated at Liscard, New Brighton and New Ferry.</p> <p>The Regeneration Areas account for over 50% of the Council's supply. The level of development assumed within the urban area in the time frame required is unachievable and is an 'unsound' approach to plan making.</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>The Council's Sustainability Appraisal (SA) concludes that Option A (Urban Intensification only is the preferred approach.</p> <p>Whilst it is noted Option A is predicted to have positive effects across 9 of the 13 SA topics , the appraisal has acknowledged the deliverability of residential units on some sites within the urban area could be a significant issue (par 11.1 Wirral waters) . As demonstrated in this representation the deliverability of previously developed sites in the plan period is highly questionable and therefore the positive conclusions drawn as part of the sustainability appraisal should be challenged. If the anticipated level of development is not realised in the urban area, then arguably, positive effects on socio-economic factors may not be as great as they are currently presented in the SA Report. The benefits in terms of health, wellbeing and population are subsequently debateable, as new social infrastructure may not be able to be provided as originally envisaged as the quantum of development which is expected to be delivered within a short time frame would not have the ability to generate the required social infrastructure such as additional schools and healthcare facilities or job opportunities in sustainable locations. Such significant positive benefits would only be guaranteed if the urban intensification option is delivered in its entirety.</p>
<p>If you wish to make a separate representation, relating to legal compliance,</p>	

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

<p>participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	
<p>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-202
Person ID	1312388
Include files	
Consultee Name	Stretton Estates Queensferry Ltd
Position	Land
Company / Organisation	Satplan
Agent ID	1312385
Agent Name	Joanne McGrath
Position	
Company / Organisation	
Number	Policy WS 3.2
Title	Housing Density
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.2
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	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 Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	The densities included in this policy are ambitious and arguably unviable. The Council's evidence base supporting the Local Plan also seeks to ensure family housing can be delivered in the borough. As over 50% of the proposed supply is directed towards Regeneration Areas this is not consistent with the findings of the 2021 SHMA for the need for increased family housing in the borough. The Council's reliance of the delivery of large apartment schemes and higher density housing is unsound

<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>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>It would be advantageous to verbally explain the strong planning merits for residential development on the Site to represent our clients 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>	Yes

Comment ID	LPSD-203
Person ID	1312388
Include files	
Consultee Name	Stretton Estates Queensferry Ltd
Position	Land
Company / Organisation	Satplan
Agent ID	1312385
Agent Name	Joanne McGrath
Position	
Company / Organisation	
Number	Policy RA 6
Title	Wirral Waters Regeneration Area
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	RA 6
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>The Policy relies on approximately 3,320 new dwellings to be delivered.</p> <p>There is a lack of credible evidence underpinning this Policy and specifically the delivery of this quantum of housing within the proposed timeframe. It is clear there is a requirement for significant levels of funding to realise this target, currently there are no guarantees regarding the level or timing of such funding. Whilst the aims and objectives of this policy are valid, the policy needs to be realistic and deliverable. Over reliance on housing delivery from this policy serious compromises soundness of the Policy and the wider Plan.</p> <p>The Council's reliance on anticipating future planning applications and the numbers which could be generated from them, is a high risk strategy and in our view creates an 'engineered' approach to the published supply figures provided as part of this consultation.</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>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>It would be advantageous to verbally explain the strong planning merits for residential development on the Site to represent our clients 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>	Yes

Comment ID	LPSD-204
Person ID	1312388
Include files	
Consultee Name	Stretton Estates Queensferry Ltd
Position	Land
Company / Organisation	Satplan
Agent ID	1312385
Agent Name	Joanne McGrath
Position	
Company / Organisation	
Number	Policy WP 4.2
Title	Residential Sites
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WP 4.2
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	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 Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	We also have several concerns in relation to the deliverability of Sites with the Settlement Areas which account for a total of 2,620 dwellings. Bromborough – WP 4.2 1. Former D1 Oils Site –The Plan assumes 1,225 units (whilst an outline application has been submitted, market knowledge would indicate the Site is viable for approximately 800 dwellings) 2. Unilever Research Site – The Plan assumes 120 units, but there are known issues with services/utilities running through the site. The Site came to market in September 2020 but a planning application is yet to be submitted. We are of the view a more realist yield would be 80 dwellings. Moreton

	<p>1. Former Foxfields School Site – The Plan assumes 65 Units – The Site is Council owned, we understand there was a development agreement with a developer, however, this agreement has lapsed which seriously questions the assumed delivery by 2024/2025.</p> <p>There is a significant mismatch between the aspirations concerning delivery of housing in the proposed Plan and what the market can and will realistically deliver. From the above 3 Sites alone there would appear to be an over estimation of delivery by around 500 units. However, the wider position across Wirral is even more stark. Most proposals on regeneration Sites in the Birkenhead area significantly over state the output of new residential units. We have significant concerns regarding the viability for many of these Sites, a view which is shared by much of the developer industry. Concerns over viability and rates of delivery go straight to the heart of the Plan and raises very significant concerns regarding the soundness of the Plan.</p> <p>The Council's preferred strategy to principally allocate several previously developed Sites in the east of the Borough is unsound. Such proposed distribution will not effectively meet the future housing needs of Wirral. The housing needs in West Wirral are severely compromised by this approach.</p>
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations	

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

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

Comment ID	LPSD-205
Person ID	1323519
Include files	LPSD-205-PDF-Myers-1507-Redacted.pdf
Consultee Name	Sarah Myers
Position	
Company / Organisation	
Agent ID	1323518
Agent Name	Sarah Myers
Position	
Company / Organisation	
Number	Policy WP 4.2
Title	Residential Sites
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	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.	Site SA4.11 Unilever Research, Quarry Road East, Bebington

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.	
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	

<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-206
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 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
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**

Comment ID	LPSD-207
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 4.2
Title	Residential Sites
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WP 4.2
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	We support H 3 that any development on these sites must contribute to managing Eastham Country Park. Increased use during Covid has already led to trampling of bluebells and other damage, and significant investment is need in infrastructure and staff to protect the ancient woodland of this LWS from excess usage. Such contributions should include long-term funding throughout the life of the development to sustain ongoing costs. See Sustainability Appraisal p574

<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>	
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Comment ID	LPSD-208
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 8.2
Title	Agricultural Land
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 8.2
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	Policy WP8.2 is a great improvement on current practice and we support it, along with supporting paragraphs 5.72-5.74.
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>	
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Comment ID	LPSD-209
Person ID	1237771
Include files	LPSD-209-Clarke-0106-A-Redacted.pdf LPSD-209-EM-Clarke-0106-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 unsound. Please be	Please find attached an email from the Council's Information Manager dated 16 February 2021 @ 10.41 confirming that the comments we made on the Council's Local Plan 2020-25 "have been uploaded onto the Council's on-line consultation portal". You have failed to consider our comments, which included that the land in question was "Green Space", you also referred in your communications with us regarding the Council's Local Plan 2020-2025 to the land in question being "Green Space". You had a professional duty, and a duty to the Public, to consider the land in question as "Local Green Space " in accordance with the National Planning Framework (NPFF) published in July 2018 when formulating the Council's Local Plan 2021-2037 but have demonstrably failed to do so

<p>as precise as possible.</p>	<p>The reason for you so failing is on the evidence that the Council have been in discussions with the owner of the land in question to lift the restrictive covenants on the land in question to enable it to be used for housing development which use is strictly forbidden by the restrictive covenants and by the government's planning policies as set out in the NPFF on " Local Green Space" land .</p> <p>Please be clear we are continuing to press your Information Management to disclose, as they are obliged to under the EIR 2004 the communications between the Council and the owner of the land in question regarding the restrictive covenants. Should the Council continue to refuse to disclose we have the right to request the Information Commissioner to instruct them to disclose. We also have the right to refer the Council's conduct in respect of this issue to the Local Government Ombudsman and to the District Auditor.</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>Site RES-SA6.4 should be designated as 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>* 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-210
Person ID	1312420
Include files	LPSD 148, 210-EM-Dean-02.06_Redacted.pdf
Consultee Name	Ms. Amanda Dean
Position	
Company / Organisation	
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 Positively Prepared
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	I am emailing concerning building on land at and behind Gibson House. Me and all my neighbours including everyone I have spoken on Seabank rd are completely against any more building on this land. This was a beautiful site with a lovely old building on it and ancient trees. The lovely green, grassy hill behind it and the gardens were full of nature (foxes, bats etc) and used by the public and wildlife for many years. The hill is a beautiful place to picnic and look out to sea, and is used by many families and dog walkers. The ancient trees which have now gone were beautiful to look out on from my flats, as was the old building. Now the site and houses are an eyesore!!!! The plans include more high flats, all concrete around site, and plans to build even more monstrosities on the grassy hill!!!! This wasn't what people on seabank rd were informed of and we are not happy with plans. The council seem to want to build on any piece of land they can find and us as residents can't seem to do anything about it!!! I am representing the local Egremont area (I haven't spoken to lot's of people) and saying that we are against any more building on Gibson Park. Yours faithfully, ADean [address redacted]

<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>remove allocations, object to sites. land at and behind Gibson House.</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-212
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 1.2
Title	Trees
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WD 1.2
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
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.	We support in general, but with ref to B8, `Provide for the protection of trees of greatest visual or wildlife value and other vigorous healthy trees, and hedgerows;' This is ineffective because it will lead to arguments over what is of greatest value and what is healthy. The wording `of visual and wildlife value' is dubious – most trees and hedges have some wildlife value!

<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</p>	<p>We propose remove this wording as likely to lead to disputes over the health and wildlife value of trees and hedges.</p> <p>`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, soil health 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>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>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 Tree, Woodland and Hedgerows Strategy, we suggested a new text: <i>protect all trees and hedgerows, recognising their value for visual amenity, wildlife, pollution control, noise reduction, climate amelioration and other value, unless the trees are already failing and have an expected life span of less than a decade.</i></p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	

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-213
Person ID	1237771
Include files	LPSD-213 214-EM-Terence LPSD-213 214-EM-Clarke-20.05-A1-Redacted.pdf LPSD-213 214-EM-Clarke-20.05-A2-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?	Site
* Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat Regulations Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this	RES SA 6.4

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	<p>please refer to the attached for full response the restrictive covenants had not been released - the said land NOT therefore on these grounds alone being AVAILABLE for housing development - the Planning Department had included under Policy WP6.3 ID RES-SA6.4 the land in question for housing development....</p> <p>The restrictive covenants were clearly prescribed by the Council in the Public Interest to be in place in perpetuity to protect this Green Space land which is also a site of Environmental and Biological Importance populated by bats, foxes and a variety of birds which we can attest to..../.</p>

as precise as possible.	<p>We have made it clear in our various submissions that the land in question is not only Green Space land but also a Site of Environmental and Biological Importance.</p> <p>Please confirm the Council will delete its proposal in its Draft Local Plan 2021-2037 that the land in question be used for housing development. Should the Council fail to do so by the 10 June 2022 we will take action to publicise the Council's conduct and behaviour and refer it to the regulatory bodies including the Information Commissioner and the Local Government Ombudsman.</p>
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you	Site RES SA 6.4 should be designated Local Green Space, and a Site of Biological Importance

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

Comment ID	LPSD-214
Person ID	1237771
Include files	LPSD-213 214-EM-Clarke-20.05-A2-Redacted.pdf LPSD-213 214-EM-Clarke-20.05-A1-Redacted.pdf LPSD-213 214-EM-Terence
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? * 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
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	<p>please refer to the attached for full response the restrictive covenants had not been released - the said land NOT therefore on these grounds alone being AVAILABLE for housing development - the Planning Department had included under Policy WP6.3 ID RES-SA6.4 the land in question for housing development....</p> <p>The restrictive covenants were clearly prescribed by the Council in the Public Interest to be in place in perpetuity to protect this Green Space land which is also a site of Environmental and Biological Importance populated by bats, foxes and a variety of birds which we can attest to..../.</p>

as precise as possible.	<p>We have made it clear in our various submissions that the land in question is not only Green Space land but also a Site of Environmental and Biological Importance.</p> <p>Please confirm the Council will delete its proposal in its Draft Local Plan 2021-2037 that the land in question be used for housing development. Should the Council fail to do so by the 10 June 2022 we will take action to publicise the Council's conduct and behaviour and refer it to the regulatory bodies including the Information Commissioner and the Local Government Ombudsman.</p>
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you	Site RES SA 6.4 should be designated Local Green Space, and a Site of Biological Importance

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

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

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

If you wish to participate in the

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

Comment ID	LPSD-215
Person ID	1237771
Include files	LPSD-215-216-EM-Clarke-09.06-Redacted.pdf LPSD-215-216-EM-Clarke-09.06-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?	Site
* Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this	RES SA 6.4

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	We refer to your 3 emails at 16.35, 16.09 and 15.55 this afternoon all regarding your wrongful inclusion in your Local Plan 2021-37 of Land on Grange Hil -I plan scan 484 attached - for housing development - your proposal only now being disclosed for the first time is for 35 to 50 dwellings and to embrace not only the old mushroom farm site (circa. 0.6acres) but also a much larger area (circa 2.9 acres) which is all the subject of restrictive covenants precluding it being used for housing development and which land for the past 5 years the Council and ourselves have referred to in correspondence as "Green Space".

<p>as precise as possible.</p>	<p>The Council were fully aware that the land was "Green Space" as described in National Planning Framework and had a duty in the Public Interest to designate it as such. Instead of complying with its duty the Council's reprehensible strategy has been to include the land in its Local Plan 2021-37, give the Public and Community Groups only 45 days (9 May to 24 June) to digress the huge amount of information in the Local Plan and then without taking account of the representations made on it pass the Plan to the Government saying the Council have achieved the Housing Target set and leaving it to the Planning Inspector to decide on the representations.</p> <p>.We emailed you and the other recipients of this email on the 26 May 2022 @ 19.28 making formal Application for the said land to be Designated "Local Green Space (LGS). - the said land meets all the criteria in the National Planning Framework (NPF) for it to be so designated. The National Planning Framework specifies that a LGS can be designated when the Local Plan is, as it is now, being reviewed</p> <p>We await your early reply to our Application made on 26 May which provides all the evidence to prove the said land should be designated LGS. Further evidence from community groups and Open Space Society's is being assembled and will be sent in due course. We request again that the date for submission of further evidence to support the Application for the land in question to be Designated LGS be extended, taking account of holidays, to at least the 31 July 2022 .Please be fully aware that we reserve the right to refer the Council's conduct to the Local Government Ombudsman and the District Auditor</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in</p>	

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

LPSD-216

Comment ID	LPSD-216
Person ID	1237771
Include files	LPSD-215-216-EM-Clarke-09.06-A-Redacted.pdf LPSD-215-216-EM-Clarke-09.06-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 unsound. Please be	We refer to your 3 emails at 16.35, 16.09 and 15.55 this afternoon all regarding your wrongful inclusion in your Local Plan 2021-37 of Land on Grange Hil -I plan scan 484 attached - for housing development - your proposal only now being disclosed for the first time is for 35 to 50 dwellings and to embrace not only the old mushroom farm site (circa. 0.6acres) but also a much larger area (circa 2.9 acres) which is all the subject of restrictive covenants precluding it being used for housing development and which land for the past 5 years the Council and ourselves have referred to in correspondence as "Green Space".

<p>as precise as possible.</p>	<p>The Council were fully aware that the land was "Green Space" as described in National Planning Framework and had a duty in the Public Interest to designate it as such. Instead of complying with its duty the Council's reprehensible strategy has been to include the land in its Local Plan 2021-37, give the Public and Community Groups only 45 days (9 May to 24 June) to digress the huge amount of information in the Local Plan and then without taking account of the representations made on it pass the Plan to the Government saying the Council have achieved the Housing Target set and leaving it to the Planning Inspector to decide on the representations.</p> <p>.We emailed you and the other recipients of this email on the 26 May 2022 @ 19.28 making formal Application for the said land to be Designated "Local Green Space (LGS). - the said land meets all the criteria in the National Planning Framework (NPF) for it to be so designated. The National Planning Framework specifies that a LGS can be designated when the Local Plan is, as it is now, being reviewed</p> <p>We await your early reply to our Application made on 26 May which provides all the evidence to prove the said land should be designated LGS. Further evidence from community groups and Open Space Society's is being assembled and will be sent in due course. We request again that the date for submission of further evidence to support the Application for the land in question to be Designated LGS be extended, taking account of holidays, to at least the 31 July 2022 .Please be fully aware that we reserve the right to refer the Council's conduct to the Local Government Ombudsman and the District Auditor</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in</p>	

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

Comment ID	LPSD-217
Person ID	1311854
Include files	LPSD-217,222,226,229,493,495-497,499-501 & 503-Heath_Redacted.pdf LPSD-217,229,242,246,258,497 & 506-Heath-Redacted.pdf
Consultee Name	Mr John Heath
Position	Planning Rep & Convenor and Steering Group Member
Company / Organisation	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
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.	Paras 1.3, 10.32 et al and Foreword
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	Foreword and Paras 1.3, 10.32, et al: ITPAS (Irby, Thurstaston & Pensby Amenity Society) and WGSA (Wirral Green Space Alliance - an association of over 30 community and pressure groups with over 5,000 Members (see list at end of this 'Representation') strongly support the Draft Local Plan (DLP) based mainly upon 'Regeneration' and limited development within some other existing urban areas. This was the approach demanded by WGSA Groups, including ITPAS, and from mid to late 2019 belatedly accepted by Wirral Metropolitan Borough Council (WMBC). However, we have

as precise as possible.

concluded that there are both significant and advisable changes required for the Draft Local Plan to be classed as 'sound', requiring modification and a 'Main Modification', the latter being seen as essential to remove an unnecessary risk over the medium term to the success of this Local Plan in the achievement of its stated Aims and Objectives. This and further 'Representations' from ourselves and other WGSA Colleagues (most notably Prof. David Gregg and Hilary Ash) address these matters where we believe the Plan is lacking in being 'positively prepared', 'justified', effective' and/or 'consistent with national policy'.

We agree with the statement that "Birkenhead in particular ... has been in decline for several decades and unless we press on with new development and address the particular issues of deprivation and housing market failure, this deterioration will continue." Decline has continued for over 60 years with several failed attempts at real 'Regeneration' and a Local Plan. We must NOT let this opportunity fail on the thrown of Landowner/Developer greed or the Council's over-ambition.

The Council has "listened to our local communities" and changed its approach from mass House-building in Green Belt (eventually-admitted and confirmed in writing) to 'Regeneration' of mainly the deprived areas of the east and north of the Peninsula as a direct consequence of effective and sustained political pressure by WGSA and others (who brought about a political change in Council control). Whilst the Council's motive for the changed approach may initially have been the twin fears of further loss of local control and Government 'Intervention', through thorough investigation and considerable effort they became absolutely convinced of the validity of the current approach. WMBC have, however, been totally deaf to any argument, proof or action over the inappropriateness of their highly-inflated 'Housing Need' figure despite their admitting that it is overstated.

'Representations' of WGSA, ITPAS, other Groups and individuals will demonstrate the huge extent by which the Council's dogged adherence to the out-dated and discredited 'Standard Method' and 2014 ONS Data has led to a wholly inappropriate and vastly-inflated (supposed policy-off) 'Housing Need' Base Figure (with no mention, calculation or reasoned explanation of a policy-on 'Housing Requirement', just added contingency upon contingency). Such divergence from reality has been recognised by both local and nationally-renowned Population and Planning experts (including Government Advisers such as Prof. Ludi Simpson and Piers Elias) and the OSR (Office of Statistics Regulation) with whom the WGSA lead expert, Prof David Gregg, has been working, reached agreement and contributed to their critical Report on and with instructions to the ONS.

Prof. Gregg's full Report conclusively demonstrates that Wirral's 'Housing Need' is circa 4,300 additional dwellings over the 16-year Plan Period, a figure which accords with conclusions of Prof. Ludi Simpson (formerly of Manchester University and a Consultant working with Liverpool Uni. for WMBC on 'Housing Need' and 'Exceptional Circumstances'). The DLP fails to demonstrate how the realistic 'Housing Need' (policy-off) figure of circa 4,300 additional homes is adjusted through their Policies to arrive at a 'Housing Requirement' (policy-on) of even half of the Council's inflated figure. The Council has never produced nor published its 'Objectively Assessed Housing Need' nor explained how this is adjusted to a 'Housing Requirement'. These both need doing in the requested 'Main Modification'. The Reader is directed to the Report by Prof. Gregg lodged with separate WGSA 'Representations' and also attached here.

'Exceptional Circumstances', mentioned above, relates to two quite distinct Local Plan matters: Firstly, we fully support WMBC's statement and conclusion in Para 1.3, "that the exceptional circumstances to justify alterations to the Green Belt boundaries (as set out in paragraph 141 of the NPPF) do not exist in Wirral." This relates to the quantum of available and deliverable 'Brownfield' land and buildings being of national significance, far exceeding the extent required for delivery of Wirral's 'Housing Need', located appropriately, and in line with the 5th Purpose of Green Belt [(e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.] and the commitment by all LAs within the former Merseyside County Council – to maintain tightly-drawn Green Belt boundaries on Wirral specifically to overcome past failures to regenerate the deprived areas to the east and north – also a commitment and Aim of the full Liverpool City Region (LCR).

We draw attention to Para 10.32 (et al) in this regard and call on the Council to make it clear that the 'exceptional circumstances' referred here in order to make land available "for the delivery of additional school or education capacity necessary to serve the development" does not relate to the Release of Green Belt or other Greenspace land as this would be a direct consequence of approving a housing development and contradict the commitment that the Local Plan is predicated on there being NIL necessity to release Green Belt for Housing.

Secondly, we believe that the Evidence relied upon by the Council in concluding that there were no 'exceptional circumstances' to allow them to assess 'Housing Need' through alternative methodology and data sources (including their own Local Administrative Data) is utterly flawed in that the University of Liverpool's Report(s) fail even in their own overly-limited terms to demonstrate what they say it does, rely upon out-of-date data, and ignore relevant Government, OSR (Office of Statistics Regulation) and House of Commons Select Committee (HoC SC) statements, and fail to consider at all an appropriately wide range of statistical and non-statistical factors, which should have been taken into account as there is no legal definition of 'exceptional circumstances' and are examples of wider factors. It should be concluded that the conscious narrowness of consideration led to the advised course not to question the (out-of-date and discredited) 'Standard Method' and 2014 ONS Data. Whilst the Reader is again directed to Prof. Gregg's main Report (lodged as WGSA 'Representations' and attached), we would amplify our position on this critical matter, that (notwithstanding past reluctance to deviate) there are compelling grounds in this Case to do so:

Ground 1.

The true 'Housing Need' for Wirral for the 16-year LP Period is ~4,300 additional dwellings, compared with the Council's figure of over 13,000. The ~4,300 figure has been independently assessed by several Experts, as referred to above. There is no possible calculation or a required 'policy-off' Objective Assessment of 'Housing Need' which arrives at 13,000+ (and developer references to date have been either heavily flawed, out-of-date or both). The Council has not performed nor published its own 'Objectively Assessed Housing Need' (OAHN).

The sheer level of discrepancy in 'Need' figures (300% or 67%) in itself constitutes an 'exceptional circumstance' as it is considerably beyond the threshold of 'material significance' (15-25%). ITPAS and WGSA call for a 'Main Modification' to provide a Local Plan with a realistic 'Housing Need' and 'Housing Requirement', ones which also avoid an unnecessary peak level of Risk.

Ground 2.

The Council has (for reasons one can only speculate) taken the flawed LU2 Report ('Exploring the Computation of Housing Need in Wirral 2020') at unquestioned face-value and has not addressed in-house or independently either the criticisms of that and earlier LU Reports, or the several Papers sent it by Prof. Gregg and Graham Stevens, or the scope and conclusions

of Prof. Ludi Simpson's companion Report (to LU's own original two Reports for WMBC), which all have similar projections. Again, the Reader is directed to the Report by Prof. Gregg lodged as a WGSA 'Representation'.

Ground 3.

WMBC has not considered nor instructed others to consider non-statistical factors which might justify there being 'exceptional circumstances' to establishing Wirral's 'Housing Need' through an alternative methodology and/or Data sources – this despite having received WGSA's argued case documents over the last four years and letters from successive Secretaries of State which raised the issue/opportunity and outlined possible non-statistical 'exceptional circumstances'.

The real housing need of Wirral has at its head thousands of recorded 'Substandard' dwellings, the 'Replacement' or 'Upgrading' of which are not to any degree addressed by the additional Housing Stock represented by 'Housing Need'. In fact, Wirral has a surplus of Housing Stock but much of which is 'Substandard' or long-term 'Empty'. Other aspects of the real housing need of Wirral are 'Affordable Homes' (but not in the numbers proposed), adaptable First-time Buyer/Starter Homes, dwellings for those wishing to Downsize (and thereby release larger, sought-after family homes), and accessible residences with low levels of support or care.

Wirral's non-statistical 'exceptional circumstances' include, inter alia:

- (i) The exceptionally high levels and extent (on a national scale) of deprivation and poor health outcomes especially in the east and north of Wirral, which are not to any degree addressed by the additional Housing Stock represented by 'Housing Need';
- (ii) The exceptional disparity across the Peninsula, in terms of wealth, housing, employment, 'green environments', public services particularly health services, which would not to any material degree be addressed by additional expensive housing in the west of Wirral;
- (iii) The tightly-drawn Green Belt boundaries around existing urban areas, specifically introduced and maintained by the former Merseyside County Council (MCC) (with agreement of all LAs within it) for the purpose of addressing (i) and (ii) above, where past efforts and initiatives had failed and adverse conditions had persisted and worsened, and where the LCR is fully behind Wirral's current drive to wholesale Regeneration;
- (iv) Consequent loss of Green Belt from a high 'Housing Need' figure derived from the formerly-mandated 'Standard Method' and 2014ONS Data (higher than that derived through alternative means) was included within Secretary of State letters to the Council as a possible ground for there being 'exceptional circumstances';
- (v) An inflated, unnecessarily high 'Housing Need' figure runs the avoidable risk of Housing Delivery Test (HDT) difficulties down the line, where delivery may have met actual demand but where actual demand had not kept up with theoretical HDT targets. In this situation, the Council would be under undue pressure to deliver on non-existent demand, that developers and landowners would argue could easily be achieved by housing developments in Green Belt, attracting inward migration (mainly of more elderly pensioners) which would add little to the local economy as their need for public services would increase over time (especially for expensive health services) and Wirral's exceptional 'green' assets would be diminished.
- (vi) Wirral is a Peninsula bounded for the most part by protected coastal zones of local, national and international significance for wildlife, ecology, biodiversity, environment and scenery as well as the wellbeing of its Residents and Visitors. And, where much of the inland, non-urban land is open Green Belt and farmland which is (i) critically-related to the protected coastal areas as breeding, foraging and sheltering necessarily open grounds (recognised in Para 3.122 and strongly emphasised and supported by us); (ii) includes many areas subject to periodic or regular flooding; and (iii) is largely 'productive' agricultural farmland with B&MV soils, the protection of which has already resulted (in theory if not yet in practice) through a unanimously passed Motion in Council NOT to release ANY 'productive farmland' for development, in line with its declared 'Climate Emergency' and now Government statements of intent to protect farmland for essential future 'Food Security'.

Footnote: Wirral Green Space Alliance (WGSA) includes the Groups:

Barnston Village Conservation Society
 Bebington Residents
 Bidston Village Conservation Area
 Bromborough Society
 CPRE Cheshire and Wirral
 Claremont Group
 Conservation Areas Wirral
 Defend Wirral's Green & Open Spaces
 Eastham Village Preservation Association
 Frankby Conservation Area Advisory Committee
 Friends of Birkenhead Park
 Greasby Community Association
 Hamilton Square Conservation Area
 Heswall Society
 Irby Cricket Club
 Irby, Thurstaston & Pensby Amenity Society
 King's Gap Conservation Area
 Meols Drive Conservation Area
 Mountwood Residents
 Oxtown Society
 Saughall Massie Conservation Area
 Stop Hoylake Golf Resort Action Group
 Storeton Residents Assoc.
 The Caldys Society
 The Ramblers Wirral Group
 The Wirral Society
 Thornton Hough Community Trust Ltd
 Thornton Hough Conservation Area Society
 Wirral and Cheshire Wildlife
 Wirral Barn Owl Trust
 Wirral Footpaths and Open Spaces Preservation Society

**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	<p>Although WGSAs 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>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 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 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>Below I give the 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>Having seen individuals and Groups struggling to communicate effectively with the Council over the emerging Local Plan, three years ago I, as Planning Rep for ITPAS (Irby, Thurstaston & Pensby Amenity Society) became co-founder and Convenor of WGSA (Wirral Green Space Alliance) in order to co-ordinate the work and liaison with outside and in-house experts (including nationally-renowned Population experts and government advisers Prof Ludi Simpson and Piers Elias, WGSA's own Prof David Gregg, Hilary Ash of Wirral & Cheshire Wildlife, Planning Consultant Jackie Copley of CPRE and The Wirral Society, and our legal advisers); also, to organise responses to and direct contact with the Council and to ramp up political pressure. The Alliance quickly grew to 31 local Groups, held regular meetings and communicated extensively online.</p> <p>For several years I and others have been providing the Council with detailed argument in respect of serious flaws with their 'Housing Need' figures, former Spatial Strategy, lack of Air Quality Monitoring and action, the need to properly address the huge disparity across the Peninsula and long-overdue need for extensive Regeneration, and other matters. Through</p>

campaigns and political pressure, WGSA managed to effect a change of Local Political Control, and the minority Lead Party thereafter announced in Council that they needed to listen to and involve WGSA in the emerging Local Plan going forward. In short order, WGSA was able to convince the Council of the need to change their LP approach significantly, to one that was 'Regeneration-led', 'Brownfield-first' and had no requirement to Release Green Belt (or other 'greenspaces') for development. After a period of Officer and Consultant research and much hard work, the Council were convinced of the revised approach and after considerable further work and thorough review of earlier Evidence Documents and the production of new ones, we were pleased to witness the Council 'owning' the strategy and defending it fiercely.

This said, there remained areas of the emerging Local Plan which WGSA argued needed modifying. This remains the case with 'Housing Need', Housing Supply Side, 'Air Quality', Greenspaces including Green Belt, Environmental matters and some other issues. These and more have been addressed in WGSA Group and Members' DLP 'Representations'. Several incorporate our lengthy, detailed and complex Reports, where the presence of the authors and other WGSA representatives participating in the hearing session(s) may be of added value, and provide the opportunity for them to give updates on recent events including further releases of 2021 Census Data, as required.

Wirral Green Space Alliance (WGSA) is a consortium of 31 local 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 to be delivered through regeneration 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, 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 greenspace for development in the event that the Council fails the "Housing Delivery Test" in the future, made more likely by the overstated 'Housing Need' figure, 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. There are a few other matters where we would appreciate participation in hearing sessions, separately or in combination with our principal objection (the inflated 'Housing Need').

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, 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, plus 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

Yes

*	No
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Comment ID	LPSD-218
Person ID	1237771
Include files	LPSD-218-EM-Clark 1506_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? * 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
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.	We refer to your letter dated 13 June which is further evidence of your failure to exercise a duty of skill and care and your misconduct when making your proposal in relation to the above The real reason for you extending what you call the "deadline" for representations is that the original "deadline" was as the evidence shows an attempt by you to "ambush" - no consultation was carried out by you with the FofGH or local residents regarding your proposal - the FofGH, local residents and the many other users of Grange Hill and Grange Old Road whose health and safety has been disregarded by you when making your proposal. We confirm the FofGH, local residents and the many users of the Hill and Grange Old Road totally oppose your proposal to develop this "Green Space" land for housing .

	We await your response to our Application made on the 26 May @ 19.28 to have the land in question designated as "Local Green Space" in accordance with the criteria specified in the National Planning Framework published by the Ministry of Housing, Communities & Local Government in 2018. Such an action will avoid the Council incurring further wasted time and costs in pursuing this misconceived and misinformed proposal. We await your reply to our Application prior to your "deadline of 25 July 2022"
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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Please set out the modification(s) you consider necessary	Site RES-SA6.4 should be designated Local Green Space

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),

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

Comment ID	LPSD-220
Person ID	1237771
Include files	LPSD-220-221-EM-Clarke-0207-Redacted.pdf LPSD-220-221-EM-Clarke Att 2 of 2_Redacted.pdf LPSD-220-221-EM-Clarke Att 1 of 2_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 unsound. Please be	<p>please refer to attachment in full.....The fact the land in question was subject to restrictive covenants made by the Council in 1982 in the Public Interest and the fact that a number of representations had been made by local residents that the land was "Green Space" and that the Council itself described it as such should have resulted in the Council Designating the land in question as LGS and precluding it from its local plan. Instead the Council have colluded with the owner of the land in question by including the land in question in its local plan.</p> <p>Our Application of 26 May met all the criteria specified in the NPPF for the land in question to be designated as LGS. With regards to criteria (b) of the NPPF "The land is demonstrably special to a local community", the restrictive covenant on the land shown on SHLAA 3009 provides for access to "members of the public on foot only full right and liberty from time to time</p>

<p>as precise as possible.</p>	<p>and at all times hereinafter and for all purposes to pass and repass across, through, over and along the land". This access provides for example to the Public attending ceremonies at the War Memorial and fire engines to attend to the frequent fires on Grange Hill. The land can be used and is of considerable value to them by the many walkers including many locals to access Grange Hill The "beauty", "historic Significance", "Tranquility" and "Richness of wildlife" are matters of FACT and of any reasonable unbiased opinion. The fact that the land shown on SHLAA 0916 is not accessible to the public does not, under the NPPF, detract from it being designated LGS provided it meets, as it does, the other criteria</p> <p>We also confirm the Friends of Grange Hill not only object to your proposal that the land in question be used for housing development but also support the Application the land be Designated LGS, Your proposal also disregards the "Heritage Trail" (readily accessible 35 pages on a search) which connects two West Kirby "Conservation Areas" via Grange Road/Hill and then up Grange Old Road and onto Grange Hill itself which is itself the subject of a Heritage Statement - see attached scan 476.</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 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-221
Person ID	1237771
Include files	LPSD-220-221-EM-Clarke Att 1 of 2_Redacted.pdf LPSD-220-221-EM-Clarke Att 2 of 2_Redacted.pdf LPSD-220-221-EM-Clarke-0207-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 unsound. Please be	<p>please refer to attachment in full.....The fact the land in question was subject to restrictive covenants made by the Council in 1982 in the Public Interest and the fact that a number of representations had been made by local residents that the land was "Green Space" and that the Council itself described it as such should have resulted in the Council Designating the land in question as LGS and precluding it from its local plan. Instead the Council have colluded with the owner of the land in question by including the land in question in its local plan.</p> <p>Our Application of 26 May met all the criteria specified in the NPPF for the land in question to be designated as LGS. With regards to criteria (b) of the NPPF "The land is demonstrably special to a local community", the restrictive covenant on the land shown on SHLAA 3009 provides for access to "members of the public on foot only full right and liberty from time to time</p>

<p>as precise as possible.</p>	<p>and at all times hereinafter and for all purposes to pass and repass across, through, over and along the land". This access provides for example to the Public attending ceremonies at the War Memorial and fire engines to attend to the frequent fires on Grange Hill. The land can be used and is of considerable value to them by the many walkers including many locals to access Grange Hill The "beauty", "historic Significance", "Tranquility" and "Richness of wildlife" are matters of FACT and of any reasonable unbiased opinion. The fact that the land shown on SHLAA 0916 is not accessible to the public does not, under the NPPF, detract from it being designated LGS provided it meets, as it does, the other criteria</p> <p>We also confirm the Friends of Grange Hill not only object to your proposal that the land in question be used for housing development but also support the Application the land be Designated LGS, Your proposal also disregards the "Heritage Trail" (readily accessible 35 pages on a search) which connects two West Kirby "Conservation Areas" via Grange Road/Hill and then up Grange Old Road and onto Grange Hill itself which is itself the subject of a Heritage Statement - see attached scan 476.</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 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-222
Person ID	1311854
Include files	LPSD-217,222,226,229,493,495-497,499-501 & 503-Heath_Redacted.pdf
Consultee Name	Mr John Heath
Position	Planning Rep & Convenor and Steering Group Member
Company / Organisation	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
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.	Paras 2.1, 2.3, 2.13, 2.17
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>Para 2.1: In stating that, "The setting of the Borough is distinctive, as a peninsula surrounded by sites of national and international importance for nature conservation which extend to the estuaries, foreshore and coastal waters", a distinctive fact and character are missing, which should lead to vast sections of the Rural Settlement Green Belt both not being 'weakly performing' (a term for which there is no basis in Planning Law) but also as having to be protected from development because such land is inextricably linked to the surrounding sites of national and international importance for nature conservation, their being irreplaceable foraging, nesting, hunting and breeding grounds, which if lost would do irreparable harm to the Peninsula's surrounding sites and Wirral's Visitor and Tourist Economy and attraction.</p> <p>Para 2.3: Firstly: We support this paragraph explaining why the land away from the coast and outside existing urban areas was designated as 'tightly drawn' Green Belt, in order to, "protect the character of towns and villages: and direct development into existing towns. This was to assist in ... regeneration ...". However, some further explanation and emphasis should be</p>

added to the DLP text as: (i) the character of towns and villages to be protected is not just within them but also to preserve separation between distinct communities, in line with the second Purpose of Green Belt [(b) to prevent neighbouring towns merging into one another]; and (ii) after many years of decline and failed initiatives, actively to direct development solely to existing areas particularly the run-down, declining and deprived areas mainly in the east and north of Wirral, in line with the fifth Purpose of Green Belt [(e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.]. The forerunner to the 'Liverpool City Region' (LCR), Merseyside County Council (MCC), had the agreement of all other LAs within MCC to draw up Wirral's Green Belt in this way, recognising the overriding need for 'Regeneration' on Wirral, with other new housing outside of existing urban areas taking place mainly off the Peninsula. The need persists.

Secondly: An increasing proportion of Wirral's Green Belt is being given over to equestrian use for grazing and stables. The open aspect ('openness') is becoming heavily compromised by horse shelters, caravans, unauthorised construction and hardstandings, and great unsightly piles of manure and discarded equipment arising from poor management and lack of Council monitoring and action. There are two main issues here apart from the loss of 'openness':

- (i) a reducing area of land is being used for agricultural production at a time when the value of such land for future 'Food Security' and political self-determination is gaining prominence. This has extended locally to the Council having passed unanimously a Motion that NIL 'productive agricultural land' should be released for development; and
- (ii) there are a rising and worrying number of Green Belt sites, having been turned to equestrian uses, subsequently being classed as Previously Developed Land (PDL) and thus available for particularly Housing use, when Green Belt legislation should deem this 'inappropriate' but poor management and lack of control renders sites unsightly, promoting an acceptance of 'tidying-up' through development. Neither of these facts and concerns is stressed in the DLP but should be.

Para 2.7: We recognise particularly in the east of the Peninsula the "high levels of multiple deprivation". These figures are simply awful and disgraceful, and their level, extent and worsening persistence over decades, together with the huge disparity across the Wirral, demand immediate attention and prioritising to the exclusion of other interests and agendas, including landowners' and developers' natural desire to maximise the value and development returns of their assets. Such are the levels of deprivation and disparity that they feature highly in national statistics and must constitute exceptional circumstances, including the 'Exceptional Circumstances' required to depart from the calculation of 'Housing Need' using the (discredited and to be abandoned) 'Standard Method' and wholly discredited, out-of-date and highly distorting 2014 ONS Population Data.

The Council point to the University of Liverpool's commissioned Reports which conclude that certain of Wirral's criteria and figures are not particularly 'exceptional'. This has allowed the Council, for reasons never satisfactorily explained, to continue with an admitted, vastly-inflated 'Housing Need' (and 'Housing Requirement'), several times the level indicated by Local Administrative Data and calculations by WGSA experts and observations by nationally-renowned experts (including Prof Ludi Simpson, formerly of Manchester University). ITPAS and WGSA seek the disregarding of the University of Liverpool's Reports and Conclusions on the bases that: (i) they consider too few relevant matters; (ii) they concentrate comments based upon one set of ONS Data (now discredited); and (iii) they ignore the fact that 'Exceptional Circumstances' is not legally or narrowly defined and can relate to more than a set of statistics, which in Wirral's case should include (a) the degree of Deprivation; (b) the thousands of 'Substandard' dwellings (poor state of much of the Housing Stock); (c) the constricting Geography of a Peninsula with protected 'exclusion' zones all around and linked areas within; (d) the potential for loss of Green Belt (highlighted by a past Secretary of State); and more. Prof Gregg's Rebuttal of Liverpool University's Report on 'Exceptional Circumstances' is relevant here and attached.

Attention is drawn to separate, detailed 'Representations' and Reports lodged by WGSA Members including Prof David Gregg and Jackie Copley (Planning Consultant), and to support expressed by Prof Ludi Simpson, Piers Elias and others, including indirectly (through liaison with Prof Gregg) the Office of Statistics Regulation (OSR, ONS's Regulator), the common conclusions of whom centre on a 'Housing Need' for additional homes of the order of 4,300 over 16 years compared with the inflated Council figure of over 13,000. This disparity itself is also regarded as an 'Exceptional Circumstance', being well above the normal material threshold for 'significance', 15% to 25%.

On these grounds and others covered later and separately by WGSA experts and Members, ITPAS and WGSA are calling for a 'Main Modification' to reduce the 'Housing Need' figure to a more realistic one based upon proven, up-to-date Data, a figure that would increase certainty of Delivery of what is actually needed and leave 'headroom' for addressing the Replacement and/or Upgrading of 'Substandard' Housing Stock and their surrounds. That this would be possible without fundamental change to the DLP or the Timescale was stated in meetings with the Council, including by the former Head of Planning and the Local Plan Team.

Para 2.10: The more significant statistic here is that almost 40% of Wirral Residents who are in employment commute off-Peninsula for their work. This produces a high amount of polluting vehicle journeys and mileage, and traffic congestion at peak times. Were there a significant increase in employment on Wirral, this could see commuters choosing to take up the new local opportunities, which could lead to these damaging figures actually reducing, with both the Air Quality and work/life balance improving. Further, this type of change in the employment and commuting pattern would not involve a need for additional Housing Stock as those involved would already be Residents of Wirral. Only after this 'slack' were taken up and/or Residents' incomes had risen significantly would additional housing be required to address economic growth – i.e., a pro-rata reduced rate. This factor is yet another reason why the Council's 'Housing Need' figure in excess of 13,000 is absurd and a great and damaging exaggeration which can only do harm if not reduced to sensible levels through a 'Main Modification'.

Para 2.13 and Policy WS 1.1 (also Para 2.6 refers): Empty Homes back into Use:

This paragraph (2.13) touches on one element of the Council's understatement of the Supply Side for Housing, namely 'Empty Homes'. Wirral has (according to the SHMA 2020 and other sources) around 150,000 dwellings and a vacancy rate of circa 3.3%, which is 33% higher than the national average of 2.5%. This means just under 5,000 homes are 'empty' but Wirral has an exemplar, consistent record over 10 years of both a commitment to address this dreadful "waste" and a recorded delivery of over 250 'Empty Homes back into Use' each and every year (278 in the last full pre-Covid year). This should surely mean that it would be entirely reasonable and safe to include within the Local Plan a net supply of, say, 200 additional homes per annum (or 1,000 homes in the first 5-Year Period or 3,200 additional homes over the 16-year period of the Plan) through continuation of the commitment, programme and sustained delivery of 'Empty Homes back into Use'. However, fearing the whole category might be discounted, the DLP only includes less than 50% of the proven, consistent Delivery over the past decade. See also Policy WS 1.1, Page 57, which shows just 490 + 440 + 480 net additions for the Plan periods of 5, 5 and 6 years, or only 1,410 additional homes in all. We do not consider

	<p>this to be reasonable, particularly as there are other contingencies on the Supply Side (Delivery Totals) including an arbitrary overall 10% discount (pulled out of thin air). This is contingency upon contingency, but it should give further confidence in the Council's ability to deliver in excess of the number of dwellings to meet the actual 'Housing Need' of Wirral.</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</p>	<p>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</p>

<p>Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>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>Para 2.1: omits a distinctive fact and character because such land is inextricably linked to the surrounding sites of national and international importance for nature conservation, their being irreplaceable foraging, nesting, hunting and breeding grounds, which if lost would do irreparable harm to the Peninsula's surrounding sites etc.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s), please outline why</p>	<p>Below I give the 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>Having seen individuals and Groups struggling to communicate effectively with the Council over the emerging Local Plan, three years ago I, as Planning Rep for ITPAS (Irby, Thurstaston & Pensby Amenity Society) became co-founder and Convenor of WGSA (Wirral Green Space Alliance) in order to co-ordinate the work and liaison with outside and in-house experts</p>

<p>you consider this to be necessary:</p>	<p>(including nationally-renowned Population experts and government advisers Prof Ludi Simpson and Piers Elias, WGSA's own Prof David Gregg, Hilary Ash of Wirral & Cheshire Wildlife, Planning Consultant Jackie Copley of CPRE and The Wirral Society, and our legal advisers); also, to organise responses to and direct contact with the Council and to ramp up political pressure. The Alliance quickly grew to 31 local Groups, held regular meetings and communicated extensively online.</p> <p>For several years I and others have been providing the Council with detailed argument in respect of serious flaws with their 'Housing Need' figures, former Spatial Strategy, lack of Air Quality Monitoring and action, the need to properly address the huge disparity across the Peninsula and long-overdue need for extensive Regeneration, and other matters. Through campaigns and political pressure, WGSA managed to effect a change of Local Political Control, and the minority Lead Party thereafter announced in Council that they needed to listen to and involve WGSA in the emerging Local Plan going forward. In short order, WGSA was able to convince the Council of the need to change their LP approach significantly, to one that was 'Regeneration-led', 'Brownfield-first' and had no requirement to Release Green Belt (or other 'greenspaces') for development. After a period of Officer and Consultant research and much hard work, the Council were convinced of the revised approach and after considerable further work and thorough review of earlier Evidence Documents and the production of new ones, we were pleased to witness the Council 'owning' the strategy and defending it fiercely.</p> <p>This said, there remained areas of the emerging Local Plan which WGSA argued needed modifying. This remains the case with 'Housing Need', Housing Supply Side, 'Air Quality', Greenspaces including Green Belt, Environmental matters and some other issues. These and more have been addressed in WGSA Group and Members' DLP 'Representations'. Several incorporate our lengthy, detailed and complex Reports, where the presence of the authors and other WGSA representatives participating in the hearing session(s) may be of added value, and provide the opportunity for them to give updates on recent events including further releases of 2021 Census Data, as required.</p> <p>-----</p> <p>Wirral Green Space Alliance (WGSA) is a consortium of 31 local 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 to be delivered through regeneration 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, 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 greenspace for development in the event that the Council fails the "Housing Delivery Test" in the future, made more likely by the overstated 'Housing Need' figure, 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. There are a few other matters where we would appreciate participation in hearing sessions, separately or in combination with our principal objection (the inflated 'Housing Need').</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, 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, plus 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> <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</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-223
Person ID	1311854
Include files	
Consultee Name	Mr John Heath
Position	Planning Rep & Convenor and Steering Group Member
Company / Organisation	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
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.	Para 2.15
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.	Para 2.15: This paragraph suggests that the existing coastal defences will continue to provide protection. Why then is the Council planning to spend over £12m on a concrete wall along West Kirby Promenade, especially as there is popular opposition to it?

<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>Cancel plans to build an ugly coastal defence wall along West Kirby Promenade. The DLP says the existing coastal defences will continue to provide protection. Save the £12m plus.</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>YES please but NOT for this item.</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-224
Person ID	1311854
Include files	
Consultee Name	Mr John Heath
Position	Planning Rep & Convenor and Steering Group Member
Company / Organisation	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
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.	Para 2.17, Items xv, xx and xxii
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>Para 2.17 Item xv: Improving “the quality and suitability of existing housing” is not really addressed by the DLP but should be. Michael Gove has recently said that Replacement and Upgrading of Substandard Housing Stock should be part of all local plans going forward. Whilst there is far more ‘brownfield’ land and PDL sites/buildings than required to cater for the vastly exaggerated ‘Housing Need’ stated in the DLP, a ‘Main Modification’ to reduce this figure to something more resembling reality would provide additional ‘headroom’ to address such necessary improvements in the form of new and upgraded housing within more spacious, ‘greened-up’ and healthy surroundings.</p> <p>Para 2.17 Item xx: ITPAS and WGSA very strongly support the “protecting and enhancing linkages and corridors for people and wildlife”. The largely agricultural Green Belt areas between Wirral’s towns and villages provide delight and promote wellbeing for residents and visitors; and in addition vital, undisturbed natural routes across the Peninsula for wildlife. To consider development on Green Belt land is not only unnecessary, it would be contrary to and resisted by Planning Legislation and counterproductive on so many levels, that its complete absence</p>

	<p>from the DLP not only makes sense but is widely supported by Wirral residents right across the Peninsula, and most certainly by the 5,000 plus Members of ITPAS and WGSA who have indicated just that repeatedly over the last four years in meetings, on petitions and in the ballot box.</p> <p>Para 2.17 Item xxii: The recording, protection and investigation of 'suspected' heritage assets is now required by law. This should be added to the description of this 'issue' in the DLP.</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</p>	<p>The responses to Question 4b(3) indicate what we consider needs amending.</p> <p>para 2.17 Item xv: Improving "the quality and suitability of existing housing" is not really addressed by the DLP but should be</p>

<p>to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Para 2.17 Item xxii: The recording, protection and investigation of 'suspected' heritage assets is now required by law. This should be added to the description of this 'issue' in the DLP</p> <p>Reduce the housing requirement</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s),</p>	<p>YES, please, but NOT to this item.</p>

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

Comment ID	LPSD-225
Person ID	1246446
Include files	
Consultee Name	Mr John Young
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy RA 10
Title	New Brighton Regeneration Area
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	RA10
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.	

<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 inclusion of 250 building units in unspecified locations should be excluded as it is too imprecise to be considered a plan. There is no point in inviting comment to a so-called plan where 79.4% of the proposed new housing will be in unspecified locations in a small area containing high density housing and a few open spaces highly valued by local residents.</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>The proposed plan for New Brighton is of great concern and it is important for local residents such as myself to be given sufficient information to allow us to provide informed feedback. This is not provided in this proposal.</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-226
Person ID	1311854
Include files	LPSD-217,222,226,229,493,495-497,499-501 & 503-Heath_Redacted.pdf
Consultee Name	Mr John Heath
Position	Planning Rep & Convenor and Steering Group Member
Company / Organisation	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
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.	Paras 2.34 to 2.38 Role of Green Belt
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
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	The role of Green Belt in regeneration: Paras 2.34 to 2.38 inclusive: ITPAS and WGSA strongly support these assertions and conclusions and have been promoting them with even greater emphasis for the many years of failed attempts since 2000 to produce a Wirral Local Plan. The great hope is that the worthiness and practicality of this current Draft Local Plan may be realised and supported by the Local Plan Inspectorate albeit with a 'Main Modification' addressing the scale of the inflated 'Housing Need'.

<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>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>Below I give the 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>Having seen individuals and Groups struggling to communicate effectively with the Council over the emerging Local Plan, three years ago I, as Planning Rep for ITPAS (Irby, Thurstaston & Pensby Amenity Society) became co-founder and Convenor of WGSA (Wirral Green Space Alliance) in order to co-ordinate the work and liaison with outside and in-house experts (including nationally-renowned Population experts and government advisers Prof Ludi Simpson and Piers Elias, WGSA's own Prof David Gregg, Hilary Ash of Wirral & Cheshire Wildlife, Planning Consultant Jackie Copley of CPRE and The Wirral Society, and our legal advisers); also, to organise responses to and direct contact with the Council and to ramp up political pressure. The Alliance quickly grew to 31 local Groups, held regular meetings and communicated extensively online.</p>

For several years I and others have been providing the Council with detailed argument in respect of serious flaws with their 'Housing Need' figures, former Spatial Strategy, lack of Air Quality Monitoring and action, the need to properly address the huge disparity across the Peninsula and long-overdue need for extensive Regeneration, and other matters. Through campaigns and political pressure, WGSA managed to effect a change of Local Political Control, and the minority Lead Party thereafter announced in Council that they needed to listen to and involve WGSA in the emerging Local Plan going forward. In short order, WGSA was able to convince the Council of the need to change their LP approach significantly, to one that was 'Regeneration-led', 'Brownfield-first' and had no requirement to Release Green Belt (or other 'greenspaces') for development. After a period of Officer and Consultant research and much hard work, the Council were convinced of the revised approach and after considerable further work and thorough review of earlier Evidence Documents and the production of new ones, we were pleased to witness the Council 'owning' the strategy and defending it fiercely.

This said, there remained areas of the emerging Local Plan which WGSA argued needed modifying. This remains the case with 'Housing Need', Housing Supply Side, 'Air Quality', Greenspaces including Green Belt, Environmental matters and some other issues. These and more have been addressed in WGSA Group and Members' DLP 'Representations'. Several incorporate our lengthy, detailed and complex Reports, where the presence of the authors and other WGSA representatives participating in the hearing session(s) may be of added value, and provide the opportunity for them to give updates on recent events including further releases of 2021 Census Data, as required.

Wirral Green Space Alliance (WGSA) is a consortium of 31 local 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 to be delivered through regeneration 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, 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 greenspace for development in the event that the Council fails the "Housing Delivery Test" in the future, made more likely by the overstated 'Housing Need' figure, 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. There are a few other matters where we would appreciate participation in hearing sessions, separately or in combination with our principal objection (the inflated 'Housing Need').

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, 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, plus 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

Yes

and adoption of the
Plan).

* Yes

* No

Comment ID	LPSD-227
Person ID	1311854
Include files	
Consultee Name	Mr John Heath
Position	Planning Rep & Convenor and Steering Group Member
Company / Organisation	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
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 3.1 to 3.6 Strategic Policies and Para 3.6 Delivery of over 20,000 Homes
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
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Part 3 Strategic Policies: Page 45 onwards: The 'Introduction' and 'The Development and Regeneration Strategy' (Paras 3.1 to 3.5 inclusive) are strongly supported by ITPAS and WGSA, not least because this was the approach forwarded by those Groups and which, through political pressure, replaced the Council's earlier approach of mass housebuilding in Green Belt. Para 3.6: It should be made clear that "the potential to deliver over 20,000 new homes over the next 20 years" in Birkenhead through regeneration includes both 'additional Housing Stock' and 'Replacement' of officially 'Substandard' dwellings, and thus is NOT all net additions.

<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 support and clarification given to Question 4b(3) provide this information.ie Para 3.6: It should be made clear that “the potential to deliver over 20,000 new homes over the next 20 years” in Birkenhead through regeneration includes both ‘additional Housing Stock’ and ‘Replacement’ of officially ‘Substandard’ dwellings, and thus is NOT all net additions.</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>YES, please, but NOT for these matters.</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-228
Person ID	1311854
Include files	
Consultee Name	Mr John Heath
Position	Planning Rep & Convenor and Steering Group Member
Company / Organisation	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
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 3.1 to 3.5, Para 3.6
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	Part 3 Strategic Policies: Page 45 onwards: The 'Introduction' and 'The Development and Regeneration Strategy' (Paras 3.1 to 3.5 inclusive) are strongly supported by ITPAS and WGSA, not least because this was the approach forwarded by those Groups and which, through political pressure, replaced the Council's earlier approach of mass housebuilding in Green Belt. Para 3.6: It should be made clear that "the potential to deliver over 20,000 new homes over the next 20 years" in Birkenhead through regeneration includes both 'additional Housing Stock' and 'Replacement' of officially 'Substandard' dwellings, and thus is NOT all net additions.
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	

<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</p>	<p>Para 3.6: It should be made clear that “<i>the potential to deliver over 20,000 new homes over the next 20 years</i>” in Birkenhead through regeneration includes both ‘<i>additional Housing Stock</i>’ and ‘Replacement’ of officially ‘Substandard’ dwellings, and thus is NOT all net additions.</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>YES, thanks, but NOT for these matters.</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-229
Person ID	1311854
Include files	LPSD-217,222,226,229,493,495-497,499-501 & 503-Heath_Redacted.pdf LPSD-217,229,242,246,258,497 & 506-Heath-Redacted.pdf
Consultee Name	Mr John Heath
Position	Planning Rep & Convenor and Steering Group Member
Company / Organisation	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
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?	Policy
<ul style="list-style-type: none"> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment 	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1.1 para 3.15, p 52(et sq) Appendix 4, Para 3.22, Page 53 (et Seq) Employment land
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 outlined in 'Representations' to earlier sections, ITPAS and WGSA do not agree with the 'Housing Need' figures used in the DLP. They are clearly and avoidably considerably inflated with potentially adverse consequences for the speed of Regeneration of the deprived east and north of Wirral and the protection and benefits to persons, wildlife and the Local Economy of the Green Belt. WGSA Groups, together with studies and reports from nationally-renowned Population experts, including Prof Ludi Simpson (formerly of the University of Manchester and creator of the main software used by councils to establish 'Housing Need'), have demonstrated Wirral's appropriate 'Housing Need' ('policy-off') to be ~4,300 additional dwellings over 16 years. It would seem reasonable for a 'Housing Requirement' ('policy-on') to be somewhat larger than this figure but still a factor of 2 or more below the Council's figures. As the

as precise as possible.

divergence is so great, the normal threshold for material 'significance' (15% to 25%) is considerably exceeded, which leads us to call for a 'Main Modification' to address this disparity with a lowering of the 'Housing Need' starting point, an action which the former Head of Wirral Planning and LP Team Leader had repeatedly advised would not significantly affect the Local Plan approach or the delivery timetable. We seek to improve and make 'sound' and not to destroy the Submission DLP.

For clarity, ITPAS and WGSA would support an evidenced 'policy-on' 'Housing Requirement' somewhat higher than the true (much lower) 'Housing Need', the latter being of the order of just 4,300 net additional homes overall across the 16-Year Local Plan (equivalent to 269 dwellings per annum), a figure derived and agreed by most independent Population and Housing experts, and supported by Wirral's Local Administrative Data. [Note: the 2021 Census Data just published at the end of June 2022, suggests the true 'Housing Need' is even less than 4,300.] This support for a somewhat higher 'Housing Requirement' and the call for and necessity of a 'Main Modification' to reduce the 'Housing Need' figure to something reflecting reality (as it is legally bound to do) does not diminish our very strong support for the Regeneration-led Local Plan approach and our belief that there is no will nor perceived necessity for the DLP to be thrown out (as is the alleged ambition of some other parties).

The position regarding the 'Housing Need' figure in the DLP and various statements of intent (including some unexplained addressing of 'substandard' Housing Stock) is clouded by a lack of distinction and explanation of Wirral's 'Housing Requirement'. The latter is not the same thing as 'Housing Need' nor is it defined in the Appendix 1 'Glossary' or elsewhere within the DLP, nor properly referred to anywhere with exception of a minor reference (uncapitalised in Para 3.45) to 'C2' Housing correctly described as being in addition to 'Housing Need' but incorrectly referring to "housing requirement identified in para 3.15", where 'Housing Requirement' is not dealt with at all.

Government Housing Guidance is crystal clear: it states at the outset, "Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from ... establishing a housing requirement figure." This is further clarified in Local Government Guidance. Neither Guidance appears to have been followed here with the consequence that the Council's 'Housing Need' figure is actually an inflated 'Housing Need' figure (calculated from mistaken references and inappropriate and out-of-date methodology and Data) PLUS 'policy-on' Ambitions and Aims (some of which are appropriate, necessary and supported by us and others) PLUS extraordinary levels of Contingency and Discount on the 'Supply Side' which are unnecessarily high and not fully supported by us nor even properly evidenced (being in part completely arbitrary). This overstatement and muddle need a 'Main Modification' of the DLP to sort it out, but all the required information, alternate methodology and Data to achieve this in a short timescale are readily available to the Council; and ITPAS and WGSA continue to offer their expert in-house and supporting in-practice professional assistance free-of-charge. This would also make the most of the considerable efforts of Council Officers to date, which is recognised, admired and has been extremely costly and must not become abortive.

In saying this, we recognise that there is a degree of 'suppressed demand' and need for 'Affordable Homes'; but again both requirements are overstated through the use of out-of-date Data and poor methodology as exposed in the Report(s) produced by WGSA's in-house expert, Prof David Gregg and supplied to the Council both through this Regulation 19 'Representations' Stage Consultation and earlier by direct issuing to Senior Council Officers and Local Politicians. Whilst overstated, we would support the worthy ambition to set demanding (but not binding) early years' targets for delivery and thereby the acceleration of alleviation of stubbornly inherent problems; but such early years' excess delivery should not be taken right through the Plan Period as this could result in an unnecessary hostage-to-fortune perversely seeing the Regeneration drive thwarted and Green Belt release and development proposed once again.

Our strong support for this Regeneration-led DLP (with the exception of the inflated and confused 'Housing Need' figure) is primarily based on the recognition that the scale of long-term deprivation and decline of particularly the east and north of the Peninsula and disparity east-to-west are so great and in need of urgent action that they deserve self-imposed (but not binding) high ambition and targets. Achieving a modified Local Plan based upon the current Draft and within the existing general timescale would also put in place the first Local Plan for Wirral in over 20 years, avoid the possibility of 'Intervention' and properly deliver on both Regeneration and protection of Green Belt, which used to be the Aims of past Administrations, Officers and the Public alike.

Whilst Wirral has achieved 96% and 99% of its Housing Delivery Test (HDT) targets over the last two years, two things should be noted: firstly, the recent HDT targets are based upon a significantly inflated 'Housing Need' figure such that a more realistic assessment of current achievement could be, say, 250% of a more realistic Target – which would clearly not be exceptional having regard to other LA performance such as Knowsley which is achieving over 400% of its Target. Secondly, much of the current housing delivery arises from the highly successful (exemplary) 'Empty Homes back into Use' programme which has achieved in excess of 250 additional Housing Stock units each and every year throughout the last decade. Such a figure represents over 40% of total Delivery and should be supported going forward at much greater than the proposed 50% of past achievement as there is both Council commitment and considerable excess in supply of suitable properties.

In considering Wirral's 'Housing Need' reduction, we are NOT involving either a planned under-delivery owing to constraints (geographical, Green Belt or otherwise, although they do exist) or for 'Neighbouring LAs' to deliver any of Wirral's true 'Housing Need'. It should also be noted that none of the 'Neighbouring LAs' within the LCR or others are seeking for Wirral to deliver any of their own 'Housing Needs', a fact which raises again the question (unanswered sensibly by Wirral Council over the past four years despite repeated requests) from where would the 25,000 to 30,000 additional residents come from to match a 'Housing Need' (or 'Housing Requirement' for that matter) of 13,360 or 16,000+ additional homes when Wirral's own Population Growth is Nil, negligible or negative, the true 'Homeless' and enforced 'Sharing' figures are low, international migration is negligible and (by admission of the Head of Planning) there is to be no encouragement of inward migration from neighbouring LAs, and part of any success of attracting new employment to Wirral would be met by existing commuting residents taking up these new local jobs and abandoning commuting. It just doesn't stack up! The Appendix 4 Housing Trajectory therefore and otherwise needs alteration.

In case 'Representations' on individual sections or paragraphs are considered in isolation (possibly by separate persons), our earlier 'Representations' are repeated here where thought appropriate. For clarity, such comments are identified with their DLP locations in order and indented.

Para 2.7: We recognise particularly in the east of the Peninsula the "high levels of multiple deprivation". These figures are simply awful and disgraceful, and their level, extent and worsening persistence over decades, together with the huge disparity across the Wirral, demand immediate attention and prioritising to the exclusion of other interests and agendas, including landowners' and developers' natural desire to maximise the value and development returns of their assets. Such are the levels of deprivation and disparity that they feature highly in

	<p>national statistics and must constitute exceptional circumstances, including the 'Exceptional Circumstances' required to depart from the calculation of 'Housing Need' using the (discredited and to be abandoned) 'Standard Method' and wholly discredited, out-of-date and highly distorting 2014 ONS Population Data.</p> <p>The Council point to the University of Liverpool's commissioned Reports which conclude that certain of Wirral's criteria and figures are not particularly 'exceptional'. This has allowed the Council, for reasons never satisfactorily explained, to continue with an admitted, vastly-inflated 'Housing Need' (and 'Housing Requirement'), several times the level indicated by Local Administrative Data and calculations by WGSA experts and observations by nationally-renowned experts (including Prof Ludi Simpson, formerly of Manchester University). ITPAS and WGSA seek the disregarding of the University of Liverpool's Reports and Conclusions on the bases that: (i) they consider too few relevant matters; (ii) they concentrate comments based upon one set of ONS Data (now discredited); and (iii) they ignore the fact that 'Exceptional Circumstances' is not legally or narrowly defined and can relate to more than a set of statistics, which in Wirral's case should include (a) the degree of Deprivation; (b) the thousands of 'Substandard' dwellings (poor state of much of the Housing Stock); (c) the constricting Geography of a Peninsula with protected 'exclusion' zones all around and linked areas within; (d) the potential for loss of Green Belt (highlighted by a past Secretary of State); and more. Prof Gregg's Rebuttal of Liverpool University's Report on 'Exceptional Circumstances' is relevant here and attached.</p> <p>Attention is drawn to separate, detailed 'Representations' and Reports lodged by WGSA Members including Prof David Gregg and Jackie Copley (Planning Consultant), and to support expressed by Prof Ludi Simpson, Piers Elias and others, including indirectly (through liaison with Prof Gregg) the Office of Statistics Regulation (OSR, ONS's Regulator), the common conclusions of whom centre on a 'Housing Need' for additional homes of the order of 4,300 over 16 years compared with the inflated Council figure of over 13,000. This disparity itself is also regarded as an 'Exceptional Circumstance', being well above the normal material threshold for 'significance', 15% to 25%.</p> <p>On these grounds and others covered later and separately by WGSA experts and Members, ITPAS and WGSA are calling for a 'Main Modification' to reduce the 'Housing Need' figure to a more realistic one based upon proven, up-to-date Data, a figure that would increase certainty of Delivery of what is actually needed and leave 'headroom' for addressing the Replacement and/or Upgrading of 'Substandard' Housing Stock and their surrounds. That this would be possible without fundamental change to the DLP or the Timescale was stated in meetings with the Council, including by the former Head of Planning and the Local Plan Team.</p> <p>Need for Employment Land: Page 53 and Para 3.22 onwards:</p> <p>This is within the 'Representation' on Housing because and to the extent that it affects Housing.</p> <p>ITPAS and WGSA support the general thrust of the Council's Employment Land strategy but we are concerned that the past mistakes of creating and maintaining unattractive environments and blighted areas for many years through mothballing mainly 'brownfield' sites to cater for exaggerated and unrealised Employment Growth forecasts should not be repeated; and request that, where employment areas are suitable for Housing and there is a call for it (through delays to availability of other brownfield sites or other causes), such sites shall be made available through their flexible designation in sufficient extent by being encapsulated within the DLP, rather than any Green Belt being classed as 'reserve sites' or 'safeguarded land'. In the unlikely event that Employment growth exceeds the Council's expectations and ambitions and the contingency of available Employment Land is exhausted, firstly uncommitted, suitable Housing Sites (brownfield) should be used in preference and before any Green Belt Release is contemplated.</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</p>	

<p>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</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>explain housing need and housing requirement</p>

wording of any policy or text. Please be as precise as possible.	
<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>Below I give the 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>Having seen individuals and Groups struggling to communicate effectively with the Council over the emerging Local Plan, three years ago I, as Planning Rep for ITPAS (Irby, Thurstaston & Pensby Amenity Society) became co-founder and Convenor of WGSA (Wirral Green Space Alliance) in order to co-ordinate the work and liaison with outside and in-house experts (including nationally-renowned Population experts and government advisers Prof Ludi Simpson and Piers Elias, WGSA's own Prof David Gregg, Hilary Ash of Wirral & Cheshire Wildlife, Planning Consultant Jackie Copley of CPRE and The Wirral Society, and our legal advisers); also, to organise responses to and direct contact with the Council and to ramp up political pressure. The Alliance quickly grew to 31 local Groups, held regular meetings and communicated extensively online.</p> <p>For several years I and others have been providing the Council with detailed argument in respect of serious flaws with their 'Housing Need' figures, former Spatial Strategy, lack of Air Quality Monitoring and action, the need to properly address the huge disparity across the Peninsula and long-overdue need for extensive Regeneration, and other matters. Through campaigns and political pressure, WGSA managed to effect a change of Local Political Control, and the minority Lead Party thereafter announced in Council that they needed to listen to and involve WGSA in the emerging Local Plan going forward. In short order, WGSA was able to convince the Council of the need to change their LP approach significantly, to one that was 'Regeneration-led', 'Brownfield-first' and had no requirement to Release Green Belt (or other 'greenspaces') for development. After a period of Officer and Consultant research and much hard work, the Council were convinced of the revised approach and after considerable further work and thorough review of earlier Evidence Documents and the production of new ones, we were pleased to witness the Council 'owning' the strategy and defending it fiercely.</p> <p>This said, there remained areas of the emerging Local Plan which WGSA argued needed modifying. This remains the case with 'Housing Need', Housing Supply Side, 'Air Quality', Greenspaces including Green Belt, Environmental matters and some other issues. These and more have been addressed in WGSA Group and Members' DLP 'Representations'. Several incorporate our lengthy, detailed and complex Reports, where the presence of the authors and other WGSA representatives participating in the hearing session(s) may be of added value, and provide the opportunity for them to give updates on recent events including further releases of 2021 Census Data, as required.</p> <p>-----</p> <p>Wirral Green Space Alliance (WGSA) is a consortium of 31 local 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 to be delivered through regeneration 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, 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 greenspace for development in the event that the Council fails the "Housing Delivery Test" in the future, made more likely by the overstated 'Housing Need' figure, 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. There are a few other matters where we would appreciate participation in hearing sessions, separately or in combination with our principal objection (the inflated 'Housing Need').</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, 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, plus 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> <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</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>	Yes

Comment ID	LPSD-230
Person ID	1312229
Include files	
Consultee Name	Mr Darren May
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 10.5
Title	Community, Sport, Leisure and Cultural Facilities
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.	SR-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 Positively Prepared
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	seeks extension of designation

<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>Site SR-SA1.3 Delph Recreation Ground - This site should also include the green space which forms part of the overall open green space in that area. Specifically, the triangular area to the rear of properties between Rake Lane & Longland Road which directly connets onto the Delph Recreation Ground.</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>To provide more localised knowledge which may not be known by planning officers.</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-231
Person ID	1312229
Include files	
Consultee Name	Mr Darren May
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	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.	OS-SA1.18

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.	seeks extension of designation to include sport and recreation

<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>OS-SA1.18 Quarry Recreation Ground - This site includes a bowling green and childrens play area, and so I would propose this is also designated as 'Sport and Recreation' in addition to an Open Space.</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>To provide more localised knowledge which may not be known by planning officers.</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-232
Person ID	1312229
Include files	
Consultee Name	Mr Darren May
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	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-SA1.9

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.	seeks designation as sport and recreation as well as LGS

<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>LGS-SA1.9 Tower Grounds - This site includes a football pitch, MUGA and BMX/Skateboard facility, and so I would propose this is also designated as 'Sport and Recreation' site in addition to a LGS.</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>To provide more localised knowledge which may not be known by planning officers.</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-233
Person ID	1312229
Include files	
Consultee Name	Mr Darren May
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	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.	OS-SA1.11

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

<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>OS-SA1.11 Marine Park New Brighton - This site includes a bowling green and Tennis Courts, and so I would propose this is also designated as 'Sport and Recreation' in addition to an Open Space.</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>To provide more localised knowledge which may not be known by planning officers.</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-234
Person ID	1312229
Include files	
Consultee Name	Mr Darren May
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	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.	SR-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 Positively Prepared
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	seeks LGS designation

<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>SR-SA1.3 Delph Recreation Ground – Could this please be considered as LGS for the same reasons as LGS-SA1.1 Belvidere Recreation Ground, and also to include the triangular open green area connected to this site, between the houses on Rake Lane & Longland Road?</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>To assist with local knowledge unknown to planning officers.</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-235
Person ID	1312229
Include files	
Consultee Name	Mr Darren May
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	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.	OS-SA1.18

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.	seeks LGS designation

<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>OS-SA1.18 Quarry Recreation Ground – Could this please be considered as LGS for the same reasons as LGS-SA1.12 Kings Parade Recreation Ground?</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>To assist with local knowledge unknown to planning officers.</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-236
Person ID	1312229
Include files	
Consultee Name	Mr Darren May
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	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.	OS-SA1.5

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

<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>OS-SA1.5 Vale Park – Could this please be considered as LGS for the same reasons as LGS-SA1.9 Tower Grounds?</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>To assist with local knowledge unknown to planning officers.</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-237
Person ID	1312229
Include files	
Consultee Name	Mr Darren May
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	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.	OS-SA1.19

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.	seeks designation as LGS

<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>OS-SA1.19 St George's Park – Could this please be considered as LGS for the same reasons as LGS-SA1.4 Flynn's Piece?</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>To assist with local knowledge unknown to planning officers.</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-238
Person ID	1312229
Include files	
Consultee Name	Mr Darren May
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	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.	OS-SA1.12

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.	seeks designation as LGS

<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>OS-SA1.12 Gorse Hill Park – Could this please be considered as LGS for the same reasons as LGS-SA1.4 Flynn's Piece, in addition to it being a trust held site and used for community fundraising events and promotion of biodiversity for plants and insects, including school visits for educational purposes.</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>To assist with local knowledge unknown to planning officers.</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-239
Person ID	1312229
Include files	
Consultee Name	Mr Darren May
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	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.	OS-SA1.11

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

<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>OS-SA1.11 Marine Park New Brighton – Could this please be considered as LGS for the same reasons as LGS-SA1.12 Kings Parade Recreation Ground?</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>To assist with local knowledge unknown to planning officers.</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-240
Person ID	1312229
Include files	
Consultee Name	Mr Darren May
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	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.	OS-SA1.6

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.	seeks LGS designation

<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>OS-SA1.6 Kings Parade (Red and Yellow Noses) – Could this please be considered as LGS for the same reasons as LGS-SA1.8 Kings Parade?</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>To assist with local knowledge unknown to planning officers.</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-241
Person ID	1312229
Include files	
Consultee Name	Mr Darren May
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	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.	OS-SA1.33

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.	Seeks LGS designation

<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>OS-SA1.33 Magazine Promenade Plantations – Could this please be considered as LGS for the same reasons as LGS-SA1.13 Pilots Way Open Space, and also include the open area that is part of this open space, up to Magazine Brow. In addition, this unique site holds a war memorial and borders the heritage area of Liscard Battery within a Conservation Area.</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>To assist with local knowledge unknown to planning officers.</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-242
Person ID	1311854
Include files	LPSD-217,229,242,246,258,497 & 506-Heath-Redacted.pdf
Consultee Name	Mr John Heath
Position	Planning Rep & Convenor and Steering Group Member
Company / Organisation	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 3.2
Title	Housing Density
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.2 and Para 3.30
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 as precise as possible.	<p>Higher Density of Developments: This is mentioned in this section of the DLP (Para 3.30 et seq and et al) and in more detail later (Policy WS 3.2) as a necessity for complying with the NPPF aim of 'Making effective use of land' and the sufficiency of the availability of developable 'brownfield' sites, although that is not a problem on Wirral where the scale of such 'brownfield' land is of national significance. ITPAS and WGSA contend that in part the proposed higher densities of development (particularly of housing) are proposed to address the very significantly exaggerated 'Housing Need' and 'Housing Requirement' figures. The resulting overly-high densities proposed are unnecessary and would be detrimental to the character of Wirral's towns and villages (with the possible exception of Birkenhead and other main Regeneration areas) and to the quality of life, the space between buildings and wellbeing of residents.</p> <p>Higher densities coupled with the call for more internal space in homes (to take account of increased incidence of working and learning from home) plus more local greenspaces and open 'blue' and 'green' spaces, and increased walking, cycling and public transport routes can all only be achieved by building higher, which has not been proven to be beneficial for residents</p>

	and would change the built environment and character of towns and villages. The better solution would be a more realistic (lower) level of additional homes and a lesser drive to increased densities. See also later 'Representation' on Policies WS 7.1 and WS 9.3 and the part that Basements can play in making higher density development (including housing) more acceptable. Regarding the inflated 'Housing Need' figure, once again we refer the reader to Prof Gregg's full Report, latest version, attached.
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	Higher Density of Developments: ITPAS and WGSA contend that in part the proposed higher densities of development (particularly of housing) are proposed to address the very significantly exaggerated 'Housing Need' and 'Housing Requirement' figures. The resulting overly-high densities proposed are unnecessary and would be detrimental to the character of Wirral's towns and villages (with the possible exception of Birkenhead and other main Regeneration areas) and to the quality of life, the space between buildings and wellbeing of residents.

<p>to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Higher densities coupled with the call for more internal space in homes (to take account of increased incidence of working and learning from home) plus more local greenspaces and open 'blue' and 'green' spaces, and increased walking, cycling and public transport routes can all only be achieved by building higher, which has not been proven to be beneficial for residents and would change the built environment and character of towns and villages.</p> <p>The better solution would be a more realistic (lower) level of additional homes and a lesser drive to increased densities. See also later 'Representation' on Policies WS 7.1 and WS 9.3 and the part that Basements can play in making higher density development (including housing) more acceptable</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>Below I give the 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>hearing session(s), please outline why you consider this to be necessary:</p>	<p>Having seen individuals and Groups struggling to communicate effectively with the Council over the emerging Local Plan, three years ago I, as Planning Rep for ITPAS (Irby, Thurstaston & Pensby Amenity Society) became co-founder and Convenor of WGSA (Wirral Green Space Alliance) in order to co-ordinate the work and liaison with outside and in-house experts (including nationally-renowned Population experts and government advisers Prof Ludi Simpson and Piers Elias, WGSA's own Prof David Gregg, Hilary Ash of Wirral & Cheshire Wildlife, Planning Consultant Jackie Copley of CPRE and The Wirral Society, and our legal advisers); also, to organise responses to and direct contact with the Council and to ramp up political pressure. The Alliance quickly grew to 31 local Groups, held regular meetings and communicated extensively online.</p> <p>For several years I and others have been providing the Council with detailed argument in respect of serious flaws with their 'Housing Need' figures, former Spatial Strategy, lack of Air Quality Monitoring and action, the need to properly address the huge disparity across the Peninsula and long-overdue need for extensive Regeneration, and other matters. Through campaigns and political pressure, WGSA managed to effect a change of Local Political Control, and the minority Lead Party thereafter announced in Council that they needed to listen to and involve WGSA in the emerging Local Plan going forward. In short order, WGSA was able to convince the Council of the need to change their LP approach significantly, to one that was 'Regeneration-led', 'Brownfield-first' and had no requirement to Release Green Belt (or other 'greenspaces') for development. After a period of Officer and Consultant research and much hard work, the Council were convinced of the revised approach and after considerable further work and thorough review of earlier Evidence Documents and the production of new ones, we were pleased to witness the Council 'owning' the strategy and defending it fiercely.</p> <p>This said, there remained areas of the emerging Local Plan which WGSA argued needed modifying. This remains the case with 'Housing Need', Housing Supply Side, 'Air Quality', Greenspaces including Green Belt, Environmental matters and some other issues. These and more have been addressed in WGSA Group and Members' DLP 'Representations'. Several incorporate our lengthy, detailed and complex Reports, where the presence of the authors and other WGSA representatives participating in the hearing session(s) may be of added value, and provide the opportunity for them to give updates on recent events including further releases of 2021 Census Data, as required.</p> <p>-----</p> <p>Wirral Green Space Alliance (WGSA) is a consortium of 31 local 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 to be delivered through regeneration 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, 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 greenspace for development in the event that the Council fails the "Housing Delivery Test" in the future, made more likely by the overstated 'Housing Need' figure, 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. There are a few other matters where we would appreciate participation in hearing sessions, separately or in combination with our principal objection (the inflated 'Housing Need').</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, 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, plus 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> <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</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</p>	<p>Yes</p>

**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-243
Person ID	1311854
Include files	
Consultee Name	Mr John Heath
Position	Planning Rep & Convenor and Steering Group Member
Company / Organisation	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
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.	Policy WS 1.1
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>Policy WS 1.1 Homes: Return to Use of Empty Homes: Pages 56/57:</p> <p>The unnumbered Table to item 'C' includes discounted figures for an 'Allowance for Return to Use of Empty Homes'. This is another example of the Council's (excessive) caution but also its considerable understatement of the Housing 'Supply Side'. The figures quoted in the Table (1,410 Total, comprising 490, 440 and 480 across 5-, 5- and 6-year periods) are just around 50% of the net delivery which has been both nationally exemplar and consistently achieved without failure or much variation in any year of the last decade. This is an unrivalled track record which does not (as other LAs do) rely upon averaging higher- and low-delivery years; and this remarkable consistency should in our opinion be fully recognised. To add to the near certainty of continuation at the past level, rather than at 50% of it, are: (i) a commitment by the Council to improve the standard of housing across Wirral; (ii) a commitment by the Council to continue to treat the reduction of the high rate of vacant properties, which is around 133% of the national average, as a priority through a continuation of their successful strategy and</p>

	<p>programme; and (iii) the sheer number of identified properties suitable for upgrading and consistently made available (despite many not being in Council ownership) by proactively working with owners, both RPs and private ones.</p> <p>We strongly believe that the Council should be bolder and make more of its achievements such as this; and that this continuing exemplary and vital performance should be recognised at a much higher rate than 50% in the Local Plan housing supply, not only because it is due but also because it addresses largely 'Affordable Homes' in deprived areas and encourages (kick-starts) local regeneration, improves the appearance of areas (especially in conjunction with the Council's 'greening-up' and active movement agenda and programmes), helps to reverse the residents' impression of continuous decline and promotes community motivation and involvement. At the very least (and a poor 'second'), the under-declaring of such Housing Supply should be taken into account as yet a further contingency which should add to the confidence in overall Delivery.</p> <p>Below: repeat of text of earlier Representation for emphasis:</p> <p>Para 2.13 and Policy WS 1.1 (also Para 2.6 refers): Empty Homes back into Use:</p> <p>This paragraph (2.13) touches on one element of the Council's understatement of the Supply Side for Housing, namely 'Empty Homes'. Wirral has (according to the SHMA 2020 and other sources) around 150,000 dwellings and a vacancy rate of circa 3.3%, which is 33% higher than the national average of 2.5%. This means just under 5,000 homes are 'empty' but Wirral has an exemplar, consistent record over 10 years of both a commitment to address this dreadful "waste" and a recorded delivery of over 250 'Empty Homes back into Use' each and every year (278 in the last full pre-Covid year). This should surely mean that it would be entirely reasonable and safe to include within the Local Plan a net supply of, say, 200 additional homes per annum (or 1,000 homes in the first 5-Year Period or 3,200 additional homes over the 16-year period of the Plan) through continuation of the commitment, programme and sustained delivery of 'Empty Homes back into Use'. However, fearing the whole category might be discounted, the DLP only includes less than 50% of the proven, consistent Delivery over the past decade. See also Policy WS 1.1, Page 57, which shows just 490 + 440 + 480 net additions for the Plan periods of 5, 5 and 6 years, or only 1,410 additional homes in all. We do not consider this to be reasonable, particularly as there are other contingencies on the Supply Side (Delivery Totals) including an arbitrary overall 10% discount (pulled out of thin air). This is contingency upon contingency, but it should give further confidence in the Council's ability to deliver in excess of the number of dwellings to meet the actual 'Housing Need' of Wirral.</p>
<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	

<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>We consider the inclusion of less than 50% of the consistent Housing Stock Additions (net) achieved for each year for a decade is illogical and further understates the Housing Supply Side and unnecessarily adds an element of risk to Delivery (and thus to Green Belt) that is not realistic.</p> <p>As the Council has an exemplar record, coupled with its confirmed backing for continuation of the programme and an exceptionally large untapped supply of suitable 'brownfield' properties which have been and are ideally suited to provide the type of necessary and sought-after homes plus an active Market of willing contractors, developers, RPs and Buyers, we do not share the concern that including a higher percentage of proven consistent delivery risks the whole category. Something in excess of 75% would be more reasonable.</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 the 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>Having seen individuals and Groups struggling to communicate effectively with the Council over the emerging Local Plan, three years ago I, as Planning Rep for ITPAS (Irby, Thurstaston & Pensby Amenity Society) became co-founder and Convenor of WGSA (Wirral Green Space Alliance) in order to co-ordinate the work and liaison with outside and in-house experts (including nationally-renowned Population experts and government advisers Prof Ludi Simpson and Piers Elias, WGSA's own Prof David Gregg, Hilary Ash of Wirral & Cheshire Wildlife, Planning Consultant Jackie Copley of CPRE and The Wirral Society, and our legal advisers); also, to organise responses to and direct contact with the Council and to ramp up political pressure. The Alliance quickly grew to 31 local Groups, held regular meetings and communicated extensively online.</p> <p>For several years I and others have been providing the Council with detailed argument in respect of serious flaws with their 'Housing Need' figures, former Spatial Strategy, lack of Air Quality Monitoring and action, the need to properly address the huge disparity across the Peninsula and long-overdue need for extensive Regeneration, and other matters. Through campaigns and political pressure, WGSA managed to effect a change of Local Political Control, and the minority Lead Party thereafter announced in Council that they needed to listen to and involve WGSA in the emerging Local Plan going forward. In short order, WGSA was able to convince the Council of the need to change their LP approach significantly, to one that was 'Regeneration-led', 'Brownfield-first' and had no requirement to Release Green Belt (or other 'greenspaces') for development. After a period of Officer and Consultant research and much hard work, the Council were convinced of the revised approach and after considerable further work and thorough review of earlier Evidence Documents and the production of new ones, we were pleased to witness the Council 'owning' the strategy and defending it fiercely.</p> <p>This said, there remained areas of the emerging Local Plan which WGSA argued needed modifying. This remains the case with 'Housing Need', Housing Supply Side, 'Air Quality', Greenspaces including Green Belt, Environmental matters and some other issues. These and more have been addressed in WGSA Group and Members' DLP 'Representations'. Several incorporate our lengthy, detailed and complex Reports, where the presence of the authors and other WGSA representatives participating in the hearing session(s) may be of added value, and provide the opportunity for them to give updates on recent events including further releases of 2021 Census Data, as required.</p> <p>-----</p> <p>Wirral Green Space Alliance (WGSA) is a consortium of 31 local 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 to be delivered through regeneration 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, 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 greenspace for development in the event that the Council fails the "Housing Delivery Test" in the future, made more likely by the overstated 'Housing Need' figure, 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. There are a few other matters where we would appreciate participation in hearing sessions, separately or in combination with our principal objection (the inflated 'Housing Need').</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, 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, plus 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> <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</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>	Yes

Comment ID	LPSD-244
Person ID	1311854
Include files	
Consultee Name	Mr John Heath
Position	Planning Rep & Convenor and Steering Group Member
Company / Organisation	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 3.1
Title	Housing Design Standards
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	Policy WS 3.1 and Para 3.37 Housing Design
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.	Housing Design: Page 61, Para 3.37 and Policy WS 3.1 Page 65: It is pleasing to note the adoption of 'flexibility' in the design of housing, "to enable flexibility to change and adapt as the occupiers' needs change", as this promotes stable communities, longer term improvement of Housing Stock and better living conditions, and as it was a recommendation of ITPAS and WGSA repeatedly made but only now confirmed and included. However, we note with regret that there is no mention of this in-built flexibility requirement within Policy WS 3.1 – this omission should be addressed.

<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 note with regret that there is no mention of an in-built flexibility requirement within Policy WS 3.1 as outlined in Para 3.37 – this omission should be addressed.</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>YES, please, but not necessary for this item</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-245
Person ID	1311854
Include files	
Consultee Name	Mr John Heath
Position	Planning Rep & Convenor and Steering Group Member
Company / Organisation	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
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.	Para 3.45 et seq Additional Needs Homes and Para 3.75 et seq Specialist Housing and Missed Opportunities
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
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>Whilst it is recognised that accommodation for those requiring a higher level of aids-to-daily-living or care (C2) is outside the overall 'Housing Need' identified in paragraph 3.15, the statement in Para 3.45 might lead to the impression that dwellings for those with lower-level demands or services provided (not limited to age-related demands) are also outside of the overall 'Housing Need' identified in paragraph 3.15, which mostly they are not (being C3) despite being classed as 'Specialist Housing'. This leads us to identify a couple of further examples of 'understatement' of potential Housing Supply. Of necessity, we give merely an outline, an impression of a wider issue.</p> <p>Providers of residential care and retirement homes (including Registered Providers, RPs) have told us of difficulties in finding sites for developments they wish to build to satisfy demand. The Council needs to do better and has admitted so to WGSA in meetings. It could start with identifying more of its own sites and those of other public bodies which are suitable and either</p>

	<p>surplus to their needs or have potential for mixed development. ITPAS has in previous Consultations pointed out what it sees as missed opportunities (and part of a wider understatement of the Housing Supply Side).</p> <p>One example of the Council's own properties with long-unrealised potential is the Maintenance Yard on Arrowe Park Road. This appears poorly utilised and has for many years included a large collection of derelict buildings, surrounded by hard and soft areas. It has several notices displayed confirming it is in a dangerous state (yet periodically squatters and vandals gain access). Adding to this problem and lost opportunity, immediately to the rear is a large boarded-up, derelict Sports Pavilion Building (also thus for many years), close to another demolished smaller one. These Sites are Previously Developed Land (PDL) in Green Belt. (The adjacent golf course has its own maintenance yard and buildings). Right across the road is Landican Cemetery which also has its own large maintenance area (with possible access away from the public side/approach). Were the Corporation Yard's residual activities relocated to a combined facility at Landican Cemetery, this could release the large Corporation Yard and Buildings plus the Pavilion sites. With an area of 0.75 hectares, surrounded by views over parkland and mature woods, in close proximity to a long-established residential Home within the Park and just 500 metres from Arrowe Park Hospital and full retail outlets, this Site would make an idea location for a retirement or other residential (C3) development providing in excess of 100 homes, potentially releasing the same number of dwellings for other families, one-for-one or even at a higher ratio through conversion. This scheme could be delivered quickly as the combined facility at Landican Cemetery could be completed within months and our enquiries had found that there is keen demand for such sites from Home Providers.</p> <p>A second opportunity missed in the same vicinity is within the Arrowe Park Hospital 'previously developed land'. There are over 5 hectares of surface car parking in two main areas, the larger of which used to contain domestic scale Hospital Staff homes with pleasant woodland outlooks until being demolished for car parking and replaced by multi-storey blocks on former greenspace to the rear of the site. This amount of parking is both insufficient and unsightly. With some negotiation and a little imagination, this poor and wasteful arrangement could be replanned to encompass some surface parking but also one or two multi-storey car park buildings similar in scale to the Hospital Building incorporating a single or double basement (to reduce visual impact and increase density without increased land-take). Such development would release the majority of the current car parking area for further Hospital and/or other 'essential worker' homes and/or retirement or other C3 residences, providing in excess of another 100 homes in pleasant, 'greened-up' surroundings with a mature woodland backdrop, close to all essential facilities and services.</p> <p>Such possibilities must exist across Wirral but are not yet factored into the Council's Housing Supply Side figures, of which the understatement must be considerable; but the point being made here is not to level criticism but to point out that this understatement of Supply should add to the argument that Release of ANY Green Belt for the duration of the Local Plan and well beyond is completely unnecessary, highly undesirable and not supported by most of the 20,000+ Wirral Residents questioned and petitioned. This area adds to the total picture of the potential and understatement of 'Housing Supply', on top of the 50% discounting of 'Return to Use of Empty Homes' and the incompleteness of the 'Brownfield Register' (as indicated to the Council by several Groups and individuals in past Consultations).</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	

<p>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>Para 3.45 might lead to the impression that dwellings for those with lower-level demands or services provided (not limited to age-related demands) are also outside of the overall 'Housing Need' identified in paragraph 3.15, which mostly they are not (being C3) despite being classed as 'Specialist Housing'. This should be made clear.</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>Below I give the 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>Having seen individuals and Groups struggling to communicate effectively with the Council over the emerging Local Plan, three years ago I, as Planning Rep for ITPAS (Irby, Thurstaston & Pensby Amenity Society) became co-founder and Convenor of WGSA (Wirral Green Space Alliance) in order to co-ordinate the work and liaison with outside and in-house experts (including nationally-renowned Population experts and government advisers Prof Ludi Simpson and Piers Elias, WGSA's own Prof David Gregg, Hilary Ash of Wirral & Cheshire Wildlife, Planning Consultant Jackie Copley of CPRE and The Wirral Society, and our legal advisers); also, to organise responses to and direct contact with the Council and to ramp up political pressure. The Alliance quickly grew to 31 local Groups, held regular meetings and communicated extensively online.</p> <p>For several years I and others have been providing the Council with detailed argument in respect of serious flaws with their 'Housing Need' figures, former Spatial Strategy, lack of Air Quality Monitoring and action, the need to properly address the huge disparity across the Peninsula and long-overdue need for extensive Regeneration, and other matters. Through campaigns and political pressure, WGSA managed to effect a change of Local Political Control, and the minority Lead Party thereafter announced in Council that they needed to listen to and involve WGSA in the emerging Local Plan going forward. In short order, WGSA was able to convince the Council of the need to change their LP approach significantly, to one that was 'Regeneration-led', 'Brownfield-first' and had no requirement to Release Green Belt (or other 'greenspaces') for development. After a period of Officer and Consultant research and much hard work, the Council were convinced of the revised approach and after considerable further work and thorough review of earlier Evidence Documents and the production of new ones, we were pleased to witness the Council 'owning' the strategy and defending it fiercely.</p> <p>This said, there remained areas of the emerging Local Plan which WGSA argued needed modifying. This remains the case with 'Housing Need', Housing Supply Side, 'Air Quality', Greenspaces including Green Belt, Environmental matters and some other issues. These and more have been addressed in WGSA Group and Members' DLP 'Representations'. Several incorporate our lengthy, detailed and complex Reports, where the presence of the authors and other WGSA representatives participating in the hearing session(s) may be of added value, and provide the opportunity for them to give updates on recent events including further releases of 2021 Census Data, as required.</p> <p>-----</p> <p>Wirral Green Space Alliance (WGSA) is a consortium of 31 local 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 to be delivered through regeneration 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, 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 greenspace for development in the event that the Council fails the "Housing Delivery Test" in the future, made more likely by the overstated 'Housing Need' figure, 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. There are a few other matters where we would appreciate participation in hearing sessions, separately or in combination with our principal objection (the inflated 'Housing Need').</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, 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, plus 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> <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</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>	Yes

Comment ID	LPSD-246
Person ID	1311854
Include files	LPSD-217,229,242,246,258,497 & 506-Heath-Redacted.pdf
Consultee Name	Mr John Heath
Position	Planning Rep & Convenor and Steering Group Member
Company / Organisation	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
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.	Para 3.52 Student Housing
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.	Student Housing: Para 3.52: Building Student Housing on Wirral would be a benefit to Wirral and we would support this but bringing students back from living in Liverpool might not be so good for Liverpool – is this agreed?

<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>1. Whether Wirral building Student Accommodation to bring back students from Liverpool has been agreed should be clarified.</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>Below I give the 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>Having seen individuals and Groups struggling to communicate effectively with the Council over the emerging Local Plan, three years ago I, as Planning Rep for ITPAS (Irby, Thurstaston & Pensby Amenity Society) became co-founder and Convenor of WGSA (Wirral Green Space Alliance) in order to co-ordinate the work and liaison with outside and in-house experts (including nationally-renowned Population experts and government advisers Prof Ludi Simpson and Piers Elias, WGSA's own Prof David Gregg, Hilary Ash of Wirral & Cheshire Wildlife, Planning Consultant Jackie Copley of CPRE and The Wirral Society, and our legal advisers); also, to organise responses to and direct contact with the Council and to ramp up political pressure. The Alliance quickly grew to 31 local Groups, held regular meetings and communicated extensively online.</p>

For several years I and others have been providing the Council with detailed argument in respect of serious flaws with their 'Housing Need' figures, former Spatial Strategy, lack of Air Quality Monitoring and action, the need to properly address the huge disparity across the Peninsula and long-overdue need for extensive Regeneration, and other matters. Through campaigns and political pressure, WGSA managed to effect a change of Local Political Control, and the minority Lead Party thereafter announced in Council that they needed to listen to and involve WGSA in the emerging Local Plan going forward. In short order, WGSA was able to convince the Council of the need to change their LP approach significantly, to one that was 'Regeneration-led', 'Brownfield-first' and had no requirement to Release Green Belt (or other 'greenspaces') for development. After a period of Officer and Consultant research and much hard work, the Council were convinced of the revised approach and after considerable further work and thorough review of earlier Evidence Documents and the production of new ones, we were pleased to witness the Council 'owning' the strategy and defending it fiercely.

This said, there remained areas of the emerging Local Plan which WGSA argued needed modifying. This remains the case with 'Housing Need', Housing Supply Side, 'Air Quality', Greenspaces including Green Belt, Environmental matters and some other issues. These and more have been addressed in WGSA Group and Members' DLP 'Representations'. Several incorporate our lengthy, detailed and complex Reports, where the presence of the authors and other WGSA representatives participating in the hearing session(s) may be of added value, and provide the opportunity for them to give updates on recent events including further releases of 2021 Census Data, as required.

Wirral Green Space Alliance (WGSA) is a consortium of 31 local 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 to be delivered through regeneration 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, 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 greenspace for development in the event that the Council fails the "Housing Delivery Test" in the future, made more likely by the overstated 'Housing Need' figure, 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. There are a few other matters where we would appreciate participation in hearing sessions, separately or in combination with our principal objection (the inflated 'Housing Need').

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, 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, plus 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

Yes

and adoption of the
Plan).

* Yes

* No

Comment ID	LPSD-247
Person ID	1311854
Include files	
Consultee Name	Mr John Heath
Position	Planning Rep & Convenor and Steering Group Member
Company / Organisation	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
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 3.125 and 3.142 and Policy WS 5 Biodiversity Networks and Net Gain
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>Biodiversity networks and Net Gain: Paras 3.125 and 3.142 and Policy WS 5:</p> <p>Whilst paragraph 3.125 states that “this Local Plan also prepares for the requirements of the Environment Act 2021 regarding Biodiversity Net Gain to be introduced”, neither that paragraph nor Policy WS 5 satisfactorily address the growing incidence of landowners and developers stripping sites in order to lower the base line of Biodiversity ahead of any required 'net gain'. This practice is exacerbated by the full prohibitions and penalties within the new Act not coming into force until late 2023. Also, although paragraph 3.142 makes mention of “in the rare case of a site being subject to recent damage or detrimental change then the most recent survey undertaken before the change, or an appropriate habitat from a typology will be applied as the base line from which net gain is calculated”, it incorrectly suggests that such occurrences are “rare” when they are not; and does not make it clear if this is to apply independently</p>

	<p>from the provisions of the new Act coming into force. Neither does it refer to any Council Policy. We request that the wording of Para 3.142 should also be modified so the provision is not dependent on an actual “recent survey” but include other forms of evidence including ‘historical images’ in Google Earth, photographic evidence, local resident statements, etc.</p> <p>In the face of this type of deliberate destruction, some other LAs have brought in or are in the process of bringing in immediate interim Local Policies to address this awful practice head-on. ITPAS and WGSA have requested through Councillors and Senior Officers that this be done for Wirral as soon as possible and publicised widely. However, this has not been put in train as yet. We would request that such provisions are put into this Local Plan but also into Local Policies as soon as possible so that ‘Net Gains’ would then apply to the Biodiversity Base Level existing before any action is taken on site.</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>Biodiversity networks and Net Gain: Paras 3.125 and 3.142 and Policy WS 5:</p> <p>Whilst paragraph 3.125 states that “<i>this Local Plan also prepares for the requirements of the Environment Act 2021 regarding Biodiversity Net Gain to be introduced</i>”, neither that paragraph nor Policy WS 5 satisfactorily address the growing incidence of landowners and developers stripping sites in order to lower the base line of Biodiversity ahead of any required ‘net gain’. This practice is exacerbated by the full prohibitions and penalties within the new Act not coming into force until late 2023. Also, although paragraph 3.142 makes mention of “<i>in the rare case of a site being subject to recent damage or detrimental change then the most recent survey undertaken before the change, or an appropriate habitat from a typology will be applied as the base line from which net gain is calculated</i>”, it incorrectly suggests that such occurrences are “rare” when they are not; and does not make it clear if this is to apply independently from the provisions of the new Act coming into force. Neither does it refer to any Council Policy. We request that the wording of Para 3.142 should also be modified so the provision is not dependent on an actual “recent survey” but include other forms of evidence including ‘historical images’ in Google Earth, photographic evidence, local resident statements, etc.</p> <p>In the face of this type of deliberate destruction, some other LAs have brought in or are in the process of bringing in immediate interim Local Policies to address this awful practice head-on. ITPAS and WGSA have requested through Councillors and Senior Officers that this be done for Wirral as soon as possible and publicised widely. However, this has not been put in train as yet. We would request that such provisions are put into this Local Plan but also into Local Policies as soon as possible so that ‘Net Gains’ would then apply to the Biodiversity Base Level existing before any action is taken on site.</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>Paragraph 3.125 and Policy WS 5 need to be modified in order to satisfactorily address the growing incidence of landowners and developers stripping sites in order to lower the base line of Biodiversity ahead of any required 'net gain'. This needs addressing in the DLP (in case there are delays or loopholes with the completion of the legal stages of the new Environment Act AND immediate local Policy against this terrible practice.</p> <p>The assertion that cases of damage or detrimental change are rare needs correcting to increasingly common.</p> <p>We also request that the wording of Para 3.142 should be modified so the provision is not dependent on an actual "<i>recent survey</i>" but include other forms of evidence including 'historical images' in Google Earth, photographic evidence, local resident statements, etc.</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>I do not need to be present but Hilary Ash of Wirral Wildlife, who is a member of the WGSA Steering Group and voluntary contributor to the Council's Environmental Strategies and Policies, would be a great asset to the debate (or her Colleague from Cheshire Wildlife). Hilary's expertise and experience, especially related to Wirral, are unparalleled.</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-248
Person ID	1311854
Include files	
Consultee Name	Mr John Heath
Position	Planning Rep & Convenor and Steering Group Member
Company / Organisation	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
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.	Policy 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 Justified Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	1. Regarding WS 7.1 Para 'B', 'principles and requirements', No.4: It is insufficient to require a developer to "incorporate high quality materials" as they should also be required to be durable, of low-maintenance and suited to the corrosive marine environment present throughout most urban areas on Wirral. Very costly repairs and replacements (and even Court Actions) have been experienced in the past on several sites within the LCR. The DLP should add this qualification. 2. A design feature that is often absent from more modern buildings in the UK is a Basement. In mainland Europe and beyond, basements are a common feature. Basements can provide space for storage, plant rooms, ancillary accommodation, car and bicycle parking and even secure accommodation. Many more towns and cities abroad, even historic places, have had levels for servicing and parking introduced below ground under new developments and even below existing historic public squares. Benefits include the freeing-up of the public domain

	<p>at ground level; moving around on foot or by bicycle is more pleasant, safe and easy; public spaces are more attractive and even enhance the value of surrounding internal Ground Floor accommodation.</p> <p>Basements can make the footprint of buildings (domestic and commercial) smaller, providing such benefits as: (i) reduction in energy requirements, especially heating; (ii) increase the percentage of usable, lettable Ground Floor; (iii) increase the connection of usable, lettable Ground Floor space to the outdoors; (iv) allow greater density of development and more efficient use of land (required by NPPF) without compromising on the extent of external space; and (v) alternatively increase the proportion of external space without increasing the land-take.</p> <p>It is particularly disappointing to note that the first major office buildings (for the Council) within the Birkenhead Regeneration Framework (BRF) do NOT have Basements. Prime Ground Floor accommodation is instead allocated for servicing and ancillary functions. Worse, around 25% of the prime Ground Floor accommodation is taken up with extensive Bicycle Stores and Changing Rooms with lockers and showers (on a grand scale) for all Staff who are to be cajoled or required to cycle to and from work – all this should have been below ground. Also, there is no underground parking or surface parking by policy ... but a next phase development is (yes) a multi-storey Car Park close by!</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</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>1. Regarding WS 7.1 Para 'B', 'principles and requirements', No.4: It is insufficient to require a developer to "<i>incorporate high quality materials</i>" as they should also be required to be durable, of low-maintenance and suited to the corrosive marine environment present throughout most urban areas on Wirral.</p> <p>Policies WS 7.1 to have a requirement that Basements are a presumption for new developments, especially town centre commercial and larger multiple residential unit schemes, with any absence subject to accepted justification.</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>As a retired Architect and Partner of what was at the time the largest Design Practice in the North-West, I have vast experience and am founder and Convenor of WGSA. I have been involved with the emerging Local Plan for over four years and took part at the Council's invitation in their Local Plan 'Strategic Meetings' and some working groups. I would hope to contribute positively to any debate or clarification of inter alia Design and Housing Need matters.</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-249
Person ID	1311854
Include files	
Consultee Name	Mr John Heath
Position	Planning Rep & Convenor and Steering Group Member
Company / Organisation	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 10.5
Title	Community, Sport, Leisure and Cultural Facilities
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.	Policy WS 10.5 Community, Sport, Leisure and Cultural Facilities
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>There are multiple references within the DLP citing the need to protect and enhance particularly outdoor sports pitches and leisure space, and the fact that most areas across Wirral have an under-provision which should be addressed. It is disappointing therefore to note omissions/exclusions from records which must be corrected. A case in point is Irby Park.</p> <p>Irby Park (3.94Ha) is wrongly named "Irby Recreation Ground" and wrongly listed in Appendix 13 as LGS-SA7.16 with an inappropriate and misleading designation of 'Local Green Space' and Open Space Typology' (just 'Park & Garden') when it should instead be within Appendix 12 with the Designation and Typology the same as for Ridgewood Park, Pensby: i.e., 'Irby Park; Urban Open Space, Park & Garden with Play Area and Urban Sports Facilities'. This is important because, apart from tennis courts and a bowling Green, there are Football Pitches, which are mentioned in Evidence Documents (Playing Pitches & Facilities Reports) BUT excluded without explanation from the DLP descriptions and schedules.</p>

	<p>This matters not only because successive Consultant Reports have wrongly reduced the number of Football Pitches in Irby Park from 3 to 2, then to 1 and now to none, when football matches still take place there, and there has been no consultation, announcement or justification for removing this provision and status – a lack of drainage maintenance resulting in unplayable conditions should not change the provision, merely give rise to comment on their poor state and the actions called for, especially as Paras 3.225, 5.60 Sub-para 5 and several other entries (and separate reports) all state that there is a “significant ongoing need for additional playing fields and a shortage of both grass and artificial-surface playing pitches” in all areas across Wirral. Irby Park had and should still be listed as having 3 football pitches (1 Junior and 2 Senior).</p> <p>The situation locally within the ITPAS Area is further worsened by the omission from Appendix 11 of Pensby High Schools (including Pensby Sports Centre). There are ‘School Playing Fields’ not recorded which are very much active. In addition, the large Playing Field to the north side of the School Buildings has been allowed to become overgrown and denied the public access/use which was common prior to the Pandemic. Worryingly, we are informed that there is an expressed desire for the Boys’ School and this Green Belt Playing Field to be sold off for a housing development. And, there is suspicion and concern that the mandated reprovision of playing pitches would be proposed to be at Irby Park which has space and (according to the incorrect LP description) currently has NIL pitches. There is local concern that this situation has been ‘engineered’, which should be dispelled through an appropriate statement and correction of the listings.</p> <p>Any proposal to sell off this Pensby High School Playing Field and losing its playing pitch provision would be fiercely opposed as: (i) additional pitches are called for on Wirral, not a reduction; (ii) this Site is Green Belt and would not be accepted as being ‘previously developed land’ (PDL); (iii) this Green Belt site has a major role to play in keeping the distinct communities of Pensby and Irby apart, in line with NPPF Purpose (b) of Green Belt; (iv) this Green Belt site also plays a major role in the ‘openness’ of Green Belt in this vicinity and keeping open an important ‘green’ (cross-Wirral) wildlife corridor; (v) this Green Belt site also serves Green Belt Purposes (a), (c) and (e); and (vi) this Green Belt site would be a necessary part of the mothballed former Boys’ School should the school role increase again in the future and the School be reopened.</p>
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate	

representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>The responses to Question 4b(3) state what needs modifying: the Title of 'Irby Park'; the listing of Irby Park having 3 Football Pitches (not nil);</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in</p>	<p>Yes, I wish to participate in hearing session(s)</p>

<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>Irby Park and Pensby High School are both within the ITPAS Area for which I am Planning & Footpath Rep as well as Founder/Convenor of WGSA. I have personal involvement with each of these and am a long-standing Member of Heswall Golf Club.</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-250
Person ID	1311854
Include files	
Consultee Name	Mr John Heath
Position	Planning Rep & Convenor and Steering Group Member
Company / Organisation	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 11
Title	Strategy for town and local centres
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.	Policy WS 11.6 and WS 11.1 Para A.5: Residential Development in [Town] Centres
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 11.6 and WS 11.1 Para A.5: Residential Development in [Town] Centres: ITPAS and WGSAs support these Policies, to the extent that it can bring people, activity, vitality and viability back to declining High Streets or help preserve their character, with two provisos: firstly, such development should not be permitted where it would conflict with or hamper plans that exist or are under consideration for more wholesale and beneficial redevelopment; and secondly, such development should not allow the character to be changed by the introduction of incongruous residential appearance, especially at ground floor level.

<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>Policy WS 11.6 and WS 11.1 Para A.5: Residential Development in [Town] Centres:</p> <p>ITPAS and WGSa support these Policies, to the extent that it can bring people, activity, vitality and viability back to declining High Streets or help preserve their character, with two provisos: firstly, such development should not be permitted where it would conflict with or hamper plans that exist or are under consideration for more wholesale and beneficial redevelopment; and secondly, such development should not allow the character to be changed by the introduction of incongruous residential appearance, especially at ground floor level.</p> <p>These proposed modifications to the text may seem minor but they are significant.</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>YES, please, but NOT for items of this Representation</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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