

Comment ID	LPSD-251
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 4
Title	Regeneration Policies
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	Part 4 Regeneration Policies: Introduction: Paras 4.1 to 4.7 inclusive:
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 4 Regeneration Policies: Introduction: Paras 4.1 to 4.7 inclusive: ITPAS and WGSa very strongly support the Regeneration Policies outlined in the Introduction to this Part. This was, after all, the approach successfully lobbied for, which was adopted by the Council when it abandoned its former Strategy and Policy specifically including significant Green Belt Release for house-building. It should be recognised that current Evidence Base Documents have an unfortunate but unavoidable legacy from the former, now-abandoned Strategy and Policies, as some of those Documents had stressed positive attributes which were overstated and now have had to be retroceded and remoulded with very different emphases, which nevertheless we regard better represent the real situation and balance of benefits and disadvantages and believe have arisen through genuine and much more exhaustive investigation and consideration. However, we suspect that there may well be those who will point unhelpfully and partially to the earlier, abandoned positions and statements as still having legitimacy as they seek to press for their own advantage and not for what is best for Wirral.
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be	

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

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

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

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

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

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

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

YES, please, but NOT for this item.

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

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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 WP 2
Title	Policy for the Birkenhead Commercial Core
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 5.28 Sub-para 5: Part 5: Settlement Area Policies: Priorities for Suburban Birkenhead:
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.	Part 5: Settlement Area Policies: Priorities for Suburban Birkenhead: Para 5.28 Sub-para 5: ITPAS and WGSA strongly support the continuation of “reducing the number of vacant properties ... around Birkenhead, Tranmere and Rock Ferry” (see also our ‘Representation’ on Policy WS 1.1 Homes: Return to Use of Empty Homes: Pages 56/57); but we equally strongly regret and oppose the inclusion within the DLP of only 50% of the exemplar Delivery achieved consistently each year over the past decade as this displays a lower confidence than there actually is (and should be) in case the unjustified step be taken to discount this vital and successful category entirely. We strongly urge the Plan Inspector to fully recognise the Council’s achievement, its enduring commitment, the positive differences that encouraging this element of Housing Supply brings to local communities, the local boost to regeneration and ‘place-formation’, and the ample availability of suitable properties and sites throughout the Plan Period and beyond.

<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>See earlier 'Representation' on our objection to the inclusion of less than 50% of the consistent supply of 'additional' Housing Stock through the Council's exemplar and continuing programme of 'Empty Homes back into Use', which is part of the understatement of the Housing Supply Side.</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-253
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 WP 7
Title	Policy for Irby, Thingwall, Pensby, Heswall and Gayton
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 5.60 Sub-para 4 plus additional sub-para
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>Irby ... - Settlement Area 7: Priorities for Irby ...: Para 5.60 Sub-paras 4 and 7:</p> <p>Whilst it is correct to "protect ... heritage assets, including the Scheduled Monument, Irby Hall", this paragraph should include (according to National Planning Guidance) protection of the 'surroundings' and 'setting' of Scheduled Monuments. Here, this includes: (i) the fields ('productive' agricultural land) around most of the moated site boundaries - part of the land serving the Hall; and (ii) the collection of red sandstone buildings in the immediate vicinity of Irby Hall – including the house 'Barnstables', the 'Anchor' PH, Irby Library, the former shippons office building, the Listed Irby Farm buildings, the 'Shippons' PH and the residence 298 Irby Road, which collection of buildings has been recognised by Wirral Planning Department as worthy of protection and enhancement as they form the attractive and historic entrance to Irby Village and the setting-off point for visitors and residents alike on the many pleasant walks around this part of Wirral which start along the Footpath between the 'Anchor' and Irby Hall and have the Dee Estuary and Welsh Hills as their dramatic backdrop.</p>

	<p>Para 5.60 Sub-para 7: also relates directly to Rural Area Settlement Area 8:</p> <p>An additional Sub-para 7 is required to preserve and enhance the Green Belt and 'productive' farmland around Settlement Area 7 as it currently: (i) checks sprawl of the combined but distinct communities of Heswall, Gayton, Pensby, Thingwall and urban Barnston [Green Belt Purpose (a)]; (ii) prevents the distinct community of semi-rural Irby merging with other distinct towns/villages, Thurstaston, Thingwall, Pensby and Heswall [Green Belt Purpose (b)]; (iii) safeguards surrounding countryside from further encroachment [Green Belt Purpose (c)]; and (iv) keeps open the cross-Peninsula 'green wildlife corridor' from Meols, past Greasby, on between Irby and Thingwall (including Arrowe Brook and the Ancient Woodland Harrock Wood) and between Thurstaston and Pensby and Heswall down to the River Dee Estuary.</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>Repeat of 4b(3) as modifications required are set out.</p> <p>Irby ... - Settlement Area 7: Priorities for Irby ...: Para 5.60 Sub-para 4 and 7:</p> <p>Whilst it is correct to “<i>protect ... heritage assets, including the Scheduled Monument, Irby Hall</i>”, this paragraph should include (according to National Planning Guidance) protection of the ‘surroundings’ and ‘setting’ of Scheduled Monuments. Here, this includes: (i) the fields (‘productive’ agricultural land) around most of the moated site boundaries - part of the land serving the Hall; and (ii) the collection of red sandstone buildings in the immediate vicinity of Irby Hall – including the house ‘Barnstables’, the ‘Anchor’ PH, Irby Library, the former shippons office building, the Listed Irby Farm buildings, the ‘Shippons’ PH and the residence 298 Irby Road, which collection of buildings has been recognised by Wirral Planning Department as worthy of protection and enhancement as they form the attractive and historic entrance to Irby Village and the setting-off point for visitors and residents alike on the many pleasant walks around this part of Wirral which start along the Footpath between the ‘Anchor’ and Irby Hall and have the Dee Estuary and Welsh Hills as their dramatic backdrop.</p> <p>and</p> <p>Para 5.60 Sub-para 7: also relates directly to Rural Area Settlement Area 8:</p> <p>An additional Sub-para 7 is required to preserve and enhance the Green Belt and ‘productive’ farmland around Settlement Area 7 as it currently: (i) checks sprawl of the combined but distinct communities of Heswall, Gayton, Pensby, Thingwall and urban Barnston [Green Belt Purpose (a)]; (ii) prevents the distinct community of semi-rural Irby merging with other distinct towns/villages, Thurstaston, Thingwall, Pensby and Heswall [Green Belt Purpose (b)]; (iii) safeguards surrounding countryside from further encroachment [Green Belt Purpose (c)]; and (iv) keeps open the cross-Peninsula ‘green wildlife corridor’ from Meols, past Greasby, on between Irby and Thingwall (including Arrowe Brook and the Ancient Woodland Harrock Wood) and between Thurstaston and Pensby and Heswall down to the River Dee Estuary.</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 these items</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-254
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 WP 8
Title	Policy for the Rural Area
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	Paras 5.63
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.	Part 5: Settlement Area Policies: Rural Area - Settlement Area 8: Paras 5.63, 5.65 and 5.69: Para 5.63: Reference to “inland fields” being critically linked to the protected coastline (coastal areas) should NOT be limited to “the inland fields near the foreshores” as much of the Peninsula’s central Green Belt/agricultural fields is also intrinsically linked to the protected coastline as breeding, foraging, hunting and sheltering grounds. This needs to be spelled-out as this makes much of Settlement Area 8 unavailable for development without extraordinary ‘exceptional circumstances’, of which none have been found throughout this prolonged process.

<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>Repeated responses to Q4b(3) as they describe the modifications sought:</p> <p>Part 5: Settlement Area Policies: Rural Area - Settlement Area 8: Paras 5.63, 5.65 and 5.69:Para 5.63: Reference to “inland fields” being critically linked to the protected coastline (coastal areas) should NOT be limited to “the inland fields near the foreshores” as much of the Peninsula’s central Green Belt/agricultural fields is also intrinsically linked to the protected coastline as breeding, foraging, hunting and sheltering grounds. This needs to be spelled-out as this makes much of Settlement Area 8 unavailable for development without extraordinary ‘exceptional circumstances’, of which none have been found throughout this prolonged process.</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 these items.</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-255
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 WD 2.3
Title	Archaeological Assets
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	Policy WD 2.3: Archaeological Assets: Para 6.17
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Policy WD 2.3: Archaeological Assets: Para 6.17 Reference is made here to "the Merseyside Historic Environment Record" (HER) of all known archaeological sites throughout the Borough but earlier in the same paragraph mention is also made of "presumed archaeological" sites. The latter and 'suspected' archaeological sites are not included within the Merseyside HER but are now mandated to be protected from development. There, therefore, needs to be an additional published record produced by the Council reflecting their legal duty to protect 'presumed' and 'suspected' sites, remains and artefacts. This should be included in the Council's relevant LP Policy or Policies. The Reader is also directed to refer to the separate reports sent to the Council in recent years by Prof David Gregg.

<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>	
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<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</p>	<p>Policy WD 2.3: Archaeological Assets: Para 6.17</p> <p>Reference is made here to "<i>the Merseyside Historic Environment Record</i>" (HER) of all known archaeological sites throughout the Borough but earlier in the same paragraph mention is also made of "<i>presumed archaeological</i>" sites. The latter and 'suspected' archaeological sites are not included within the Merseyside HER but are now mandated to be protected from development. There, therefore, needs to be an additional published record produced by the Council reflecting their legal duty to protect 'presumed' and 'suspected' sites, remains and artefacts. This should be included in the Council's relevant LP Policy or Policies. The Reader is also directed to refer to the separate reports sent to the Council in recent years by Prof David Gregg.</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-256
Person ID	1311854
Include files	LPSD-256, 502 & 759-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 WD 14
Title	Pollution and Risk
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 6.79 Pollution and Risk
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>Pollution and Risk: Para 6.79</p> <p>Whilst paragraph 6.79 states "It is a priority for the Local Planning Authority to maintain good air quality": (i) Wirral does not have an effective, adequate or dispersed Monitoring infrastructure in place; (ii) it also records and comments upon average levels of pollution rather than the deadly peaks which are regularly exceeded, particularly in respect of the most harmful to health - particulate matter (PMs); (iii) the monitoring regime and future plans are woefully inadequate to cope with the known and anticipated tightening of restrictions and lowering of permitted limits and thresholds. In conclusion, good air quality is NOT being maintained and there is much to change and commit to, well beyond the current misinformed and complacent comments and references to the Council's declaration of a 'Climate Change Emergency'. The landmark case of Ella Adoo-Kissi-Debrah, where a coroner has called for a change in the law after he ruled that air pollution led to the death of a nine-year-old girl, should change Wirral Council's statements, Policies and actions before there are more deaths and increases in respiratory</p>

	<p>diseases, which are increasing relentlessly on Wirral and adversely affecting life-chances. For much more expert information and opinion, ITPAS and WGSA direct the Reader to the separate, detailed 'Representation' of Prof David Gregg on 'Air Quality' with his Full Report attached. The fact that earlier versions of his Reports and warnings have been made available over recent years to the Council could play out in any local litigation.</p> <p>no scale appropriate mitigation strategy for air quality and resultant health impacts of the plan has been put in place, evaluated and quantified.</p> <p>the evidence is flawed - Air Quality Study - concerns regarding scope of modelling, exceeding WHO limits on PM2.5, and modelling assumptions of reducing PM levels and NOx levels are inaccurate - underestimate of both levels and impact on health</p> <p>Health Impact Assessment superficial and out of date.</p> <p>Wirral Environmental Sensitivity Study is misleading in this regard. Spatial and temporal impacts require review.</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</p>	

<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>Pollution and Risk: Para 6.79</p> <p>Whilst paragraph 6.79 states “<i>It is a priority for the Local Planning Authority to maintain good air quality</i>”: (i) Wirral does not have an effective, adequate or dispersed Monitoring infrastructure in place; (ii) it also records and comments upon average levels of pollution rather than the deadly peaks which are regularly exceeded, particularly in respect of the most harmful to health - particulate matter (PMs); (iii) the monitoring regime and future plans are woefully inadequate to cope with the known and anticipated tightening of restrictions and lowering of permitted limits and thresholds. In conclusion, good air quality is NOT being maintained and there is much to change and commit to, well beyond the current misinformed and complacent comments and references to the Council's declaration of a ‘Climate Change Emergency’. The landmark case of <i>Ella Adoo-Kissi-Debrah</i>, where a coroner has called for a change in the law after he ruled that air pollution led to the death of a nine-year-old girl, should change Wirral Council's statements, Policies and actions before there are more deaths and increases in respiratory diseases, which are increasing relentlessly on Wirral and adversely affecting life-chances. For much more expert information and opinion, ITPAS and WGSA direct the Reader to the separate, detailed ‘Representation’ of Prof David Gregg on ‘Air Quality’ with his Full Report attached. The fact that earlier versions of his Reports and warnings have been made available over recent years to the Council could play out in any local litigation.</p> <p>A scale appropriate mitigation strategy for air quality and resultant health impacts of the plan should be put in place, evaluated and quantified.</p> <p>The LP in respect of Air Quality and Health issues should be reviewed or subject to a main modification direction by LP Inspector.</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)	
<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</p>	<p>Yes</p>

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-257
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	Appendix 8
Title	Parking Standards, Transport Assessment and Travel Plan Thresholds
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 8.12 Parking Bay Dimensions
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Para 8.12 Parking Bay Dimensions: The 2.4m wide figure is generally discredited and not suited to either the increased width of modern cars or the size and average mobility of the current adult population. A more appropriate minimum width would be 2.5m and preference would be for a mix including 2.6/2.7m.

<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 8.12 Parking Bay Dimensions:</p> <p>The 2.4m wide figure is generally discredited and not suited to either the increased width of modern cars or the size and average mobility of the current adult population. A more appropriate minimum width would be 2.5m and preference would be for a mix including 2.6/2.7m.</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-258
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 3.3
Title	Affordable Housing Requirements
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.3 and Appendix 10
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.	Policy WS 3.3. E. and Appendix 10 Developer Contributions: ITPAS and WGSAs support the introduction of a Community Infrastructure Levy (CIL) mechanism, coupled with more stringent examination of developer 'viability' claims and Council waivers. We support this not only as an extension of the (unfortunately entitled) principle that 'the polluter pays' but also in recognition of public funding constraints and the Council's poor record on maintenance of land and buildings but worse, also of following-up on Planning Conditions it has imposed. To an extent (which we support), it is divesting itself of much of the future responsibility by invoking such Developer Contributions in terms of legal agreements (106, etc.) to both supply and maintain over long periods essential linked features, facilities and services (up to the full project life) - but they still need to monitor and follow up on such provisions. Appendix 10.7 Affordable Housing: Para 10.54

	<p>ITPAS and WGSa do NOT support the 'viability get-out' whereby developers can state viability issues on early phase(s) and agree to provide Affordable Homes as part of later phases (under Section 106 Agreements or other) as there is no guarantee that later stages will come forward or that the developer / contractor will still be in business or operating under the same legal entity. At the least, the Policy/Provision should have the requirement prior to any Agreement for the developer / contractor to demonstrate to the Council's reasonable satisfaction how later phases would be sufficiently viable, and the Council should have to demonstrate that there was a pressing need to progress with such a development, for instance but not limited to a projected failure to pass the HDT without it.</p> <p>See also Prof Gregg's Report (attached) which includes correction the quantum of necessary 'Affordable Homes'.</p> <p>Clearly, both the need to provide a developers' 'viability get-out' for early development phase(s) and the risk to Wirral's continued HDT success would both be lessened were the 'Housing Need' figure to be more realistic, of the order of 4,300 new dwellings across the 16-Year Local Plan Period, as argued in earlier 'Representations'. Unfortunately, the Council appear set on delivering a Local Plan based upon an inflated 'Housing Need' figure which the LP Team and Councillors have admitted does not represent Wirral's true Need and would directly cause avoidable Risks. A 'Main Modification' is, therefore, required to put the Local Plan on a better footing, provide the additional new homes that are actually required and in addition make significant inroads into addressing the 'Replacement' and 'Upgrading' of the huge number of 'substandard' dwellings.</p>
<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in</p>	

<p>relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Our responses to Question 4b(3) above describe what modifications we seek - repeated here.</p> <p>Policy WS 3.3 E and Appendix 10 Developer Contributions: Appendix 10.7 Affordable Housing: Para 10.54</p> <p>ITPAS and WGSAs do NOT support the 'viability get-out' whereby developers can state viability issues on early phase(s) and agree to provide Affordable Homes as part of later phases (under Section 106 Agreements or other) as there is no guarantee that later stages will come forward or that the developer / contractor will still be in business or operating under the same legal entity. At the least, the Policy/Provision should have the requirement prior to any Agreement for the developer / contractor to demonstrate to the Council's reasonable satisfaction how later phases would be sufficiently viable, and the Council should have to demonstrate that there was a pressing need to progress with such a development, for instance but not limited to a projected failure to pass the HDT without it.</p> <p>See also Prof Gregg's Report (attached) which includes correction the quantum of necessary 'Affordable Homes'.</p> <p>Clearly, both the need to provide a developers' 'viability get-out' for early development phase(s) and the risk to Wirral's continued HDT success would both be lessened were the 'Housing Need' figure to be more realistic, of the order of 4,300 new dwellings across the 16-Year Local Plan Period, as argued in earlier 'Representations'. Unfortunately, the Council appear set on delivering a Local Plan based upon an inflated 'Housing Need' figure which the LP Team and Councillors have admitted does not represent Wirral's true Need and would directly cause avoidable Risks. A 'Main Modification' is, therefore, required to put the Local Plan on a better footing, provide the additional new homes that are actually required and in addition make significant inroads into addressing the 'Replacement' and 'Upgrading' of the huge number of 'substandard' dwellings.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? * No, I do not wish to participate in</p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>hearing session(s) * Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>Below I give 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. 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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</p>	<p>Yes</p>

**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-259
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 WD 2
Title	Heritage Assets
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WD 2 and relevant Settlement Area Policies, Appendix 16 Table A16.1 Omission
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
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.	Appendix 16 Heritage Designations: Table A16.1 Omission: 'Lordymere', a Roman Well with sandstone enclosure and steps down for immersion of the sick, located on the boundary of SA7 (Irby) just inside SA8 (at the junction of South Drive and Dawlish Road) was included in the proposed list of 'Local Green Spaces' by an Evidence Base Consultant but has been omitted from the DLP. It may have been considered ineligible as an LGS, in which case it should surely have been included in Appendix 16, Heritage Designations. The Roman Well, a principal source of drinking water for the old Irby Village, at the source of the Greasby Brook, was the subject of an archaeological excavation and records include several publications. The Site was subsequently covered over for protection but it should not be forgotten nor dismissed. It is very accessible, being right alongside the much-used Footpath,

	FP44 (Anchor PH to Cottage Loaf), and ITPAS would be interested in its development as a significant local feature of historic interest, with an information board and undergrowth clearance, etc.
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	Repeat of response to Question 4b(3) as it describes modifications requested. Appendix 16 Heritage Designations: Table A16.1 Omission:

<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>'Londymere', a Roman Well with sandstone enclosure and steps down for immersion of the sick, located on the boundary of SA7 (Irby) just inside SA8 (at the junction of South Drive and Dawlish Road) was included in the proposed list of 'Local Green Spaces' by an Evidence Base Consultant but has been omitted from the DLP. It may have been considered ineligible as an LGS, in which case it should surely have been included in Appendix 16, Heritage Designations.</p> <p>The Roman Well, a principal source of drinking water for the old Irby Village, at the source of the Greasby Brook, was the subject of an archaeological excavation and records include several publications. The Site was subsequently covered over for protection but it should not be forgotten nor dismissed. It is very accessible, being right alongside the much-used Footpath, FP44 (Anchor PH to Cottage Loaf), and ITPAS would be interested in its development as a significant local feature of historic interest, with an information board and undergrowth clearance, 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</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 2021-2037? (namely submission of the</p>	<p>Yes</p>

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

*** Yes**

*** No**

Comment ID	LPSD-260
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 WP 7.2
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.	Appendix 18 Housing Allocations of 1-9 Units Table A18.1 Omission
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
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.	Appendix 18 Housing Allocations of 1-9 Units: Table A18.1 has at least one omission: that of 3 No. additional new dwellings at 79 Thingwall Road, Irby, which were approved well before the Local Plan cut-off base date (31st March 2021). Site area is 0.25Ha. Application Ref: APP/20/00721. Work has again started both on- and off-site.

<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>Appendix 18 Housing Allocations of 1-9 Units:</p> <p>Table A18.1 has at least one omission: that of 3 No. additional new dwellings at 79 Thingwall Road, Irby, which were approved well before the Local Plan cut-off base date (31st March 2021). Site area is 0.25Ha. Application Ref: APP/20/00721. Work has again started both on- and off-site.</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-262
Person ID	1323465
Include files	LPSD-175-178 and 262-264 EM-Dickinson Att1 2306_Redacted.pdf
Consultee Name	Burbo Bank Windfarm Operations
Position	
Company / Organisation	
Agent ID	1323293
Agent Name	Ms Dawn Dickinson
Position	Senior Land & Property Manager
Company / Organisation	Orsted
Number	Policy RA 2
Title	Scott's Quay Regeneration Area
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	RA 2 Scotts Quay Regeneration Area MPA -RA2.1
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
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>In its current form the Wirral Local Plan is largely complimentary to Ørsted's operations at Kings Wharf, however further consideration in respect of the following areas would be welcomed and in particular to the allocation of 450 new residential units referenced RES-RA2.1 and RES-RA2.2:</p> <p>Allocation of Additional Residential Units (Policy RA2) In allocating 450 new residential units in close proximity to Ørsted's O&M base we would be concerned in respect of increased pedestrian, cycle and vehicular traffic on existing roads, paths and shared cycleways.</p>

	<p>The O&M base's normal hours are between 6am and 6pm seven days a week. During this time the operations and associated activities will include vehicle movements, vessel loading of parts, equipment and personnel and the berthing and sailing of CTV's.</p> <p>With the increased residential allocation it would not be unreasonable for the use of the promenade to increase. As noted above, Ørsted presently cross the publicly accessible promenade to access the berthing area of its operation. Ørsted has Operating Procedures in place to ensure that the crossing of the promenade is done in a safe manner.</p> <p>Birkenhead Road Masterplan Area (MPA-RA2.1)</p> <p>Ørsted are encouraged that Residential Development within the Birkenhead Road Masterplan Area will not impact on the normal operation of port related operations or businesses.</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>Given the potential increase in promenade users, Ørsted would like to see further improvements to prohibit cycling within the viewing area of the promenade adjacent to Ørsted's O&M base and the installation of triple cycle barriers (locations and an example of a suitable barriers are provided within Appendix A). This would have the added benefit of discouraging motorised vehicles, such as motor scooters and motorbikes that are known to use the promenade illegally which would protect all users of the viewing area that are presently at risk of collision. These requests are aligned with Policy WS4.4 maintaining uninterrupted public access along the Wirral Waterfront, whilst enhancing public safety.</p> <p>Ørsted hopes that design principles could mitigate some issues in addition to ensuring that adequate highway improvements are made to guarantee that safe traffic flow within the Masterplan Area is maintained. Ørsted asks that these principles are also applied to the East Street Masterplan Area (MPA-RA2.2).</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in</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>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-263
Person ID	1323465
Include files	LPSD-175-178 and 262-264 EM-Dickinson Att1 2306_Redacted.pdf
Consultee Name	Burbo Bank Windfarm Operations
Position	
Company / Organisation	
Agent ID	1323293
Agent Name	Ms Dawn Dickinson
Position	Senior Land & Property Manager
Company / Organisation	Orsted
Number	Policy RA 2
Title	Scott's Quay Regeneration Area
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	MPA - RA 2.1, MPA-RA 2.2
Please state which Site ID/Reference this representation relates to.	

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

<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	<p>Please refer to attachment</p> <p>In its current form the Wirral Local Plan is largely complimentary to Ørsted's operations at Kings Wharf, however further consideration in respect of the following areas would be welcomed and in particular to the allocation of 450 new residential units referenced RES-RA2.1 and RES-RA2.2:</p> <p>Allocation of Additional Residential Units (Policy RA2) In allocating 450 new residential units in close proximity to Ørsted's O&M base we would be concerned in respect of increased pedestrian, cycle and vehicular traffic on existing roads, paths and shared cycleways.</p> <p>The O&M base's normal hours are between 6am and 6pm seven days a week. During this time the operations and associated activities will include vehicle movements, vessel loading of parts, equipment and personnel and the berthing and sailing of CTV's.</p> <p>With the increased residential allocation it would not be unreasonable for the use of the promenade to increase. As noted above, Ørsted presently cross the publicly accessible promenade to access the berthing area of its operation. Ørsted has Operating Procedures in place to ensure that the crossing of the promenade is done in a safe manner. Given the potential increase in promenade users, Ørsted would like to see further improvements to prohibit cycling within the viewing area of the promenade adjacent to Ørsted's O&M base and the installation of triple cycle barriers (locations and an example of a suitable barriers are provided within Appendix A). This would have the added benefit of discouraging motorised vehicles, such as motor scooters and motorbikes that are known to use the promenade illegally which would protect all users of the viewing area that are presently at risk of collision. These requests are aligned with Policy WS4.4 maintaining uninterrupted public access along the Wirral Waterfront, whilst enhancing public safety.</p> <p>Birkenhead Road Masterplan Area (MPA-RA2.1)</p> <p>Ørsted are encouraged that Residential Development within the Birkenhead Road Masterplan Area will not impact on the normal operation of port related operations or businesses. Ørsted hopes that design principles could mitigate some issues in addition to ensuring that adequate highway improvements are made to guarantee that safe traffic flow within the Masterplan Area is maintained. Ørsted asks that these principles are also applied to the East Street Masterplan Area</p>

	(MPA-RA2.2).
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>Birkenhead Road Masterplan Area (MPA-RA2.1)</p> <p>Ørsted are encouraged that Residential Development within the Birkenhead Road Masterplan Area will not impact on the normal operation of port related operations or businesses. Ørsted hopes that design principles could mitigate some issues in addition to ensuring that adequate highway improvements are made to guarantee that safe traffic flow within the Masterplan Area is maintained. Ørsted asks that these principles are also applied to the East Street Masterplan Area (MPA-RA2.2)</p>
If your representation is seeking a modification to the	

<p>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-264
Person ID	1323465
Include files	LPSD-175-178 and 262-264 EM-Dickinson Att1 2306_Redacted.pdf
Consultee Name	Burbo Bank Windfarm Operations
Position	
Company / Organisation	
Agent ID	1323293
Agent Name	Ms Dawn Dickinson
Position	Senior Land & Property Manager
Company / Organisation	Orsted
Number	Policy RA 2
Title	Scott's Quay Regeneration Area
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	RES-RA 2.2

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

<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>Given the potential increase in promenade users, Ørsted would like to see further improvements to prohibit cycling within the viewing area of the promenade adjacent to Ørsted's O&M base and the installation of triple cycle barriers (locations and an example of a suitable barriers are provided within Appendix A). This would have the added benefit of discouraging motorised vehicles, such as motor scooters and motorbikes that are known to use the promenade illegally which would protect all users of the viewing area that are presently at risk of collision. These requests are aligned with Policy WS4.4 maintaining uninterrupted public access along the Wirral Waterfront, whilst enhancing public safety.</p> <p>are concerned that the increased residential allocation may result in complaints from new residents regarding these usual operations (which may require floodlighting, vessel and vehicle warning sirens and other perceived nuisances presently acceptable within a port related environment) incompatible with residential use. Ørsted would like to see that sound deadening and screening is incorporated within any new residential development to reduce any complaints arising out of these issues</p>

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

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

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

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-265
Person ID	1323471
Include files	
Consultee Name	Mrs Wendy Wade
Position	
Company / Organisation	Grange Hill Allotment Society
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WP 6
Title	Policy for West Kirby and Hoylake
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	RES-SA6.4

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	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.	As the Secretary of Grange Hill Allotment Society I was asked, at a meeting, to represent the objections of the society to the Wirral Local Plan. Concern about: The siting of a development of 35 houses on land adjacent to the Allotments sited within the local green space on Grange Hill. Impact on wildlife (badgers, foxes, common lizards, toads, frogs & bats) in adjacent green space Potential impact on allotment site from trespass, as well as the risk of gorse fires over the whole green space

omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	<p>As the Secretary of Grange Hill Allotment Society I was asked, at a meeting, to represent the objections of the society to the Wirral Local Plan. Concern about:</p> <p>The siting of a development of 35 houses on land adjacent to the Allotments sited within the local green space on Grange Hill.</p> <p>Impact on wildlife (badgers, foxes, common lizards, toads, frogs & bats) in adjacent green space</p> <p>Potential impact on allotment site from trespass, as well as the risk of gorse fires over the whole green space</p>
Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of	<p>Members have suggested that the land at Grange farm be designated a local Green Space and that the planned development is inappropriate in the proposed area by reason of number of premises anticipated and access problems for the allotments and War Memorial.</p>

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-266
Person ID	1243700
Include files	LPSD-266, 688-692-Lowsby1807_Redacted.pdf
Consultee Name	Mr Graham Lowsby
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Part 3
Title	Strategic Policies
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	Part 3 - Strategic Policies
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.	No reason to think otherwise
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.	I consider the plan unsound for the reasons given in my representation [Plan policies WS,RA,WP,WD, WM - helpful if draft had amplified what letters stand for in order to meet para 21 of NPPF the indexed list should identify section of plan to which policy relates. Plan does not clearly distinguish between strategic and non strategic policies.]

omplies with the Duty to co-operate * Yes * No	No
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	Wirral shares a peninsula border with Cheshire West and Chester. (CW&C) The CW&C local plan was adopted prior to the duty to co-operate instruction became effective. Neither Wirral or CW&C have examined the consequences that the total new dwellings of both Council's in the peninsula will have on the overall infrastructure to support the projected population increase of the land mass surrounded by the Irish Sea and two major rivers.
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	[should be explicit which policies are strategic and non strategic, indexed policy list should identify section of the plan to which policy relates]

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

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

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

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-274
Person ID	1249070
Include files	LPSD-274, 744-749, 753, 1418-1421-Burns Attach 1807_Redacted.pdf LPSD-274-EM-Burns Form 1807_Redacted.pdf
Consultee Name	PJ Livesey Group and Mr. Peter Bowling
Position	
Company / Organisation	
Agent ID	1249074
Agent Name	Mr. Jonathan Burns
Position	Associate Planner
Company / Organisation	Pegasus Group
Number	Part 1
Title	Introduction and Background
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	1.1
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
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	The plan period up to 2037 clearly does not accord with the requirements of the NPPF. Paragraph 22 confirms that strategic policies should look ahead over a minimum 15-year period from adoption. The plan is therefore set up to fail, because as the Submission Draft has been published in 2022, it is clear that it will not provide a 15 - year plan period at the point it is adopted, which in the best case scenario is likely to occur in 2023. Indeed, even the Council's own Local Development Scheme (LDS) recognised in January 2022 that the plan will not be adopted until mid to late 2023 (see Para 6.7). As such, the plan period is clearly not sound due to it being inconsistent with national policy.

as precise as possible.	In addition, given the length of time that it has taken for the plan to be produced, and the two decades that have passed since Wirral have had an up-to-date plan, it is recommended that the Local Plan period is extended to at least a 20-year period at adoption to ensure that any plan is able to meet the needs of the Borough
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	N/A
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	N/A
Please set out the modification(s) you consider necessary to make the Local	It is recommended that the Local Plan period is extended to at least a 20-year period at adoption.

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

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

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

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

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

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

Comment ID	LPSD-275
Person ID	1323575
Include files	LPSD-275-EM-Smith Form 2007_Redacted.pdf
Consultee Name	Mr Cameron Smith
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 1
Title	The Development and Regeneration Strategy for Wirral 2021 - 2037
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	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.	<p>This Plan to build on the little green space wallasey actually has, shows that this dreadfully run council has no idea what to actually do comprehensively. I dont think one council worker has considered the cons to building on all this green space. Mental health and Quality of life will decline at rates you will not be prepared, being out in the fresh air without a house in sight is one of the most important ways of life to combat poor mental health, not pills they have more side effects than many illicit substances.</p> <p>Also, Wallasey does not have the infrastructure to support this plan. There is already difficulty for parking in new brighton and people do need to drive down to new Brighton alot, this is not a choice it is what alot of people HAVE to do drive to the area.</p> <p>This really one of the worst ideas to date. Build on derelict land if you have to. But if you do not improve the infrastructure at the same time as building new estates. You will have blood on your hands.</p> <p>Build on derelict land that is used by nobody, not greenspace used by everybody</p>
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	<p>This Plan to build on the little green space wallasey actually has, shows that this dreadfully run council has no idea what to actually do comprehensively. I dont think one council worker has considered the cons to building on all this green space. Mental health and Quality of life will decline at rates you will not be prepared, being out in the fresh air without a house in sight is one of the most important ways of life to combat poor mental health, not pills they have more side effects than many illicit substances.</p>

as precise as possible.	<p>Also, Wallasey does not have the infrastructure to support this plan. There is already difficulty for parking in new brighton and people do need to drive down to new Brighton alot, this is not a choice it is what alot of people HAVE to do drive to the area.</p> <p>This really one of the worst ideas to date. Build on derelict land if you have to. But if you do not improve the infrastructure at the same time as building new estates. You will have blood on your hands.</p> <p>Build on derelict land that is used by nobody, not greenspace used by everybody</p>
omplies with the Duty to co-operate * Yes * No	No
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying 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>don't build on green space in Wallasey</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>Because I am a part of the generation set to become the generation that will be one of the many generations that will suffer from this plan</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-276
Person ID	1241495
Include files	
Consultee Name	Mrs Lesley Brockbank
Position	Wirral Coordinator
Company / Organisation	Wirral & Cheshire Badger Group
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.	2.14
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	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 Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	2.14 only refers to 5 NIAs when in fact there are 7 as correctly stated in Policy WS 5.4. There is a significant gap between the southern and north-western NIAs which could lead to lack of wildlife connectivity across the borough.

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	Change 2.14 to include North Wirral Coast and Liverpool Bay and West Wirral Heathlands and Arrowe Park Extend NIA 3 to join NIA 6 to create a corridor for wildlife movement essential for terrestrial wildlife.

<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-277
Person ID	1241495
Include files	
Consultee Name	Mrs Lesley Brockbank
Position	Wirral Coordinator
Company / Organisation	Wirral & Cheshire Badger Group
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	
Title	The Strategic Objectives of the Local Plan
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	2.39 Strategic Objective 5
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Insufficient just to say "Protect nature by ensuring development delivers measurable net gains for biodiversity"

<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	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>We need to do more than "<i>protect</i>" existing nature. Nature is depleted in Wirral. We need to "protect, restore and enhance nature". See 3.125 National Policy requires that "<i>councils protect and enhance biodiversity,</i>"</p> <p>Should read "Protect, restore and enhance"</p>

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-278
Person ID	1241495
Include files	
Consultee Name	Mrs Lesley Brockbank
Position	Wirral Coordinator
Company / Organisation	Wirral & Cheshire Badger Group
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 5.2
Title	Open Space Provision
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	3.118
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	"that all new housing development should contribute towards the overall provision of an appropriate quality and quantity of open space at both a strategic and local level" is too vague

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	It should read <i>"high quality and as naturalistic as possible with potential to contribute to BNG and ecological networks."</i>

<p>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</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-282
Person ID	1312373
Include files	LPSD-282 to 304-WEB-Bradshaw_Redacted.pdf
Consultee Name	Bromborough Riverside Regeneration
Position	
Company / Organisation	Bromborough Riverside Regeneration Ltd
Agent ID	1311661
Agent Name	Andrew Bradshaw
Position	
Company / Organisation	Cre8 Land and Planning
Number	
Title	Vision
To which part of the Local Plan does this representation relate?	Paragraph(s)
<ul style="list-style-type: none"> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment 	
Please state which paragraph number(s) this representation relates to.	2.38
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	Please refer to attachment Bromborough Riverside Regeneration Ltd support the thrust of the vision to focus new residential development on brownfield land towards the east of the Borough with the Bromborough Wharf site helping to support the delivery of the vision and make a significant contribution through the comprehensive and coordinated delivery of up to 1,200 homes that will help to meet both the Councils housing land requirements and the range of housing needs of the Borough.
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>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-283
Person ID	1312373
Include files	LPSD-282 to 304-WEB-Bradshaw_Redacted.pdf
Consultee Name	Bromborough Riverside Regeneration
Position	
Company / Organisation	Bromborough Riverside Regeneration Ltd
Agent ID	1311661
Agent Name	Andrew Bradshaw
Position	
Company / Organisation	Cre8 Land and Planning
Number	Policy WS 1
Title	The Development and Regeneration Strategy for Wirral 2021 - 2037
To which part of the Local Plan does this representation relate?	Policy
<ul style="list-style-type: none"> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment 	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS1/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	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	<p>Please refer to attachment</p> <p>Bromborough Riverside Regeneration Ltd support the overall housing numbers identified in that the 13,360 dwellings is a minimum requirement with a recognition that it is necessary to identify a larger supply of up to 17,750 dwellings to make allowances for the potential that sites may not come forward at the pace expected.</p> <p>We also support the overall spatial distribution of new housing on brownfield sites with the Bromborough Wharf site helping to deliver up to 1,200 new homes or 50% of new housing within the other settlement areas that includes the Bromborough Neighbourhood area.</p>
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	

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

<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-284
Person ID	1312373
Include files	LPSD-282 to 304-WEB-Bradshaw_Redacted.pdf
Consultee Name	Bromborough Riverside Regeneration
Position	
Company / Organisation	Bromborough Riverside Regeneration Ltd
Agent ID	1311661
Agent Name	Andrew Bradshaw
Position	
Company / Organisation	Cre8 Land and Planning
Number	Policy WS 1.3
Title	Infrastructure
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 1.3
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>Please refer to attachment</p> <p>Bromborough Riverside Regeneration Ltd do not support the requirements to accord to the full range of infrastructure requirements set out in the Wirral Infrastructure Delivery Plan 2022 as it includes a number of infrastructure requirements for the Bromborough Wharf site (Ref. Former D1 Oils) that are not supported by detailed need or costing assessments prepared in consultation with the landowner.</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>We would suggest that the specific reference that new development proposals must accord to the full range of infrastructure requirements set out in the Wirral Infrastructure Delivery Plan 2022 is removed with a new paragraph inserted that makes reference for new development proposals to deliver appropriate infrastructure to meet the needs of the development and local community with the agreement of the Council and landowner.</p>

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-285
Person ID	1312373
Include files	LPSD-282 to 304-WEB-Bradshaw_Redacted.pdf
Consultee Name	Bromborough Riverside Regeneration
Position	
Company / Organisation	Bromborough Riverside Regeneration Ltd
Agent ID	1311661
Agent Name	Andrew Bradshaw
Position	
Company / Organisation	Cre8 Land and Planning
Number	Policy WS 3.1
Title	Housing Design Standards
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.1
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	Please refer to attachment Bromborough Riverside Regeneration Ltd support the policy requirements in relation to housing design standards as it reflects the design aspirations for the site to deliver a high-quality sustainable development with homes that meet both the lifestyle and lifecycle needs of all residents. We also support the move towards delivering 'zero carbon' development by 2041 and the need for higher energy and water efficient homes and are committed to delivering low carbon development and construction alongside the requirement for all dwellings to include electric vehicle charging as part of the strategy. However, the specific requirement for new homes to be designed and constructed to meet the Passivhaus standard is not bot supported and will be addressed in response to Policy WS 8.2.
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>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-286
Person ID	1312373
Include files	LPSD-282 to 304-WEB-Bradshaw_Redacted.pdf
Consultee Name	Bromborough Riverside Regeneration
Position	
Company / Organisation	Bromborough Riverside Regeneration Ltd
Agent ID	1311661
Agent Name	Andrew Bradshaw
Position	
Company / Organisation	Cre8 Land and Planning
Number	Policy WS 3.2
Title	Housing Density
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 3.2
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	Please refer to attachment. Bromborough Riverside Regeneration Ltd support the proposed Density Zones as they will help to deliver high density development that makes efficient use of land whilst offering flexibility to deliver a range of housing typologies that meet both housing need and market demand. The proposals for the comprehensive redevelopment of the site will deliver up to 1,200 new homes with the Bromborough West site contributing up to 564 new dwellings at average densities of 63 dwellings per hectare to include a mix of higher density apartment blocks of up to 6 storeys and lower density housing of up to 3 storeys that address the specific character of the site and market needs/demands.
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>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-287
Person ID	1312373
Include files	LPSD-282 to 304-WEB-Bradshaw_Redacted.pdf
Consultee Name	Bromborough Riverside Regeneration
Position	
Company / Organisation	Bromborough Riverside Regeneration Ltd
Agent ID	1311661
Agent Name	Andrew Bradshaw
Position	
Company / Organisation	Cre8 Land and Planning
Number	Policy WS 3.3
Title	Affordable Housing Requirements
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.3
Please state which Site ID/Reference this representation relates to.	

<p>Please state which Policies Map (Inset Map number(s)) this representation relates to.</p>	
<p>Legally compliant * Yes * No</p>	
<p>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</p>	
<p>Sound * Yes * No</p>	No
<p>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</p>	
<p>If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy</p>	Not Justified
<p>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</p>	<p>Please refer to attachment</p> <p>Bromborough Riverside Regeneration Ltd supports the policy requirement of 20% affordable housing on the site but request that the policy recognises that brownfield sites with an industrial legacy such as the Bromborough Wharf site are complex and costly to redevelop, and that the delivery of affordable housing is subject to the outcome of a financial viability assessment that takes into account the high cost of remediation and delivery.</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>Request that the policy recognises that brownfield sites with an industrial legacy such as the Bromborough Wharf site are complex and costly to redevelop, and that the delivery of affordable housing is subject to the outcome of a financial viability assessment that takes into account the high cost of remediation and delivery.</p> <p>To this end a financial viability assessment will be submitted with the current live outline planning application to determine by agreement with the Council the amount of affordable housing that the scheme is viable to deliver by our Registered Provider Partner. Where a lower percentage of affordable housing is deemed viable following the outcome of the viability assessment, we would work with our Registered Provider partner to negotiate additional affordable housing outside of any s106 agreement likely funded through Homes England grant.</p>

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-288
Person ID	1312373
Include files	LPSD-282 to 304-WEB-Bradshaw_Redacted.pdf
Consultee Name	Bromborough Riverside Regeneration
Position	
Company / Organisation	Bromborough Riverside Regeneration Ltd
Agent ID	1311661
Agent Name	Andrew Bradshaw
Position	
Company / Organisation	Cre8 Land and Planning
Number	Policy WS 3.4
Title	Housing Mix
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 3.4
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>Please refer to attachment</p> <p>Bromborough Riverside Regeneration Ltd opposes the requirement for a minimum of 70% of market dwellings to be for larger family housing of three or more bedrooms as this will not allow for the market to respond to local need where there is a higher demand for smaller housing for first time buyers and older person housing that may include a higher proportion of apartment housing typologies.</p> <p>The proposals for the comprehensive redevelopment of the site will deliver up to 1,200 new homes with the Bromborough West site contributing up to 564 dwellings of which 264 dwellings or 46% of the total number of dwellings are 1 and 2 bed apartments and houses that reflects the specific market need for smaller properties for first time buyers and older person assisted living housing and the need to mitigate visual and noise constraints from adjacent industrial uses.</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>We therefore suggest that the minimum requirement for larger family housing outside of the regeneration areas is reduced to 50% to allow for flexibility to respond to local market need and specific site constraints.</p>

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-289
Person ID	1312373
Include files	LPSD-282 to 304-WEB-Bradshaw_Redacted.pdf
Consultee Name	Bromborough Riverside Regeneration
Position	
Company / Organisation	Bromborough Riverside Regeneration Ltd
Agent ID	1311661
Agent Name	Andrew Bradshaw
Position	
Company / Organisation	Cre8 Land and Planning
Number	Policy WS 3.6
Title	Specialist Housing
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.6
Please state which Site ID/Reference this representation relates to.	

<p>Please state which Policies Map (Inset Map number(s)) this representation relates to.</p>	
<p>Legally compliant * Yes * No</p>	
<p>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</p>	
<p>Sound * Yes * No</p>	Yes
<p>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</p>	<p>Please refer to attachment</p> <p>Bromborough Riverside Regeneration Ltd support the policy to provide specialist housing for older people in sustainable locations and have included a block of 96 no. assisted living apartments as part of the housing mix on the site. The block is located in a sustainable location within 15 mins walk of a range of shops and facilities and includes both private amenity space and on-site supporting facilities as part of the offer.</p> <p>The inclusion of specialist older person housing on the site also includes ancillary community uses on the ground floor for use by both residents of the block and the wider community that will help to deliver viable community uses as part of the overall scheme for the site.</p>
<p>If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy</p>	
<p>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</p>	

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

<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-290
Person ID	1312373
Include files	LPSD-282 to 304-WEB-Bradshaw_Redacted.pdf
Consultee Name	Bromborough Riverside Regeneration
Position	
Company / Organisation	Bromborough Riverside Regeneration Ltd
Agent ID	1311661
Agent Name	Andrew Bradshaw
Position	
Company / Organisation	Cre8 Land and Planning
Number	Policy WS 5.1
Title	Green and Blue Infrastructure Networks
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 5.1
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	Please refer to attachment. Bromborough Riverside Regeneration Ltd support the policy for the retention, enhancement and creation of green and blue infrastructure as part of development proposals with the comprehensive redevelopment of the Bromborough Wharf site providing a combined 3.6 ha of new public open space and environmental planting, of which the Bromborough Wharf West site provides 1.5 ha of new public amenity space, to include children's play areas and environmental buffer planting as part of a connected green network.
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>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-291
Person ID	1312373
Include files	LPSD-282 to 304-WEB-Bradshaw_Redacted.pdf
Consultee Name	Bromborough Riverside Regeneration
Position	
Company / Organisation	Bromborough Riverside Regeneration Ltd
Agent ID	1311661
Agent Name	Andrew Bradshaw
Position	
Company / Organisation	Cre8 Land and Planning
Number	Policy WS 5.2
Title	Open Space Provision
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 5.2
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	Please refer to attachment The Bromborough Wharf site is located within 100 m of the existing 4.0 ha Old Court House Road public amenity area (Ref 118) and therefore under the policy the proposals do not need to provide any new publicly accessible open space on site but would need to provide an appropriately equipped facility for children's play of no less than 0.40 hectares. The proposals for the comprehensive redevelopment of the site will deliver approximately 3.0 ha of public amenity space with the Bromborough West site contributing 1.2 ha of publicly accessible open space to include children's play provision of c. 4,000 square metres alongside an additional 0.3 hectares of environmental buffer planting and therefore exceed the requirements of the policy on open space provision. We therefore fully support the policy on open space provision within new residential development.
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>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-292
Person ID	1312373
Include files	LPSD-282 to 304-WEB-Bradshaw_Redacted.pdf
Consultee Name	Bromborough Riverside Regeneration
Position	
Company / Organisation	Bromborough Riverside Regeneration Ltd
Agent ID	1311661
Agent Name	Andrew Bradshaw
Position	
Company / Organisation	Cre8 Land and Planning
Number	Policy WS 5.3
Title	Outdoor Sports Provision
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 5.3
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 Justified
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>Please refer to attachment.</p> <p>Bromborough Riverside Regeneration Ltd do not support the policy as worded as it is unclear on the level of contribution required based on the three scenarios set out in the supporting evidence as each one results in a different financial contribution. In addition, we hold that the analysis of demand as set out in the support evidence is flawed as it uses an average household size of 2.4 persons per household that does not reflect the latest data on the average household size. The base position in the 2011 census recorded the average household size for the Wirral as 2.27 persons per household and this is forecast to decrease to 2.23 persons per household in 2018; 2.17 persons per household by 2028; and 2.12 persons per household to 2038. Furthermore, the supporting evidence and policy do not take account of spatial differences in provision and existing supply in relation to the likely financial contribution from a new residential development.</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>Therefore, we suggest the policy and supporting evidence are amended to reflect the latest data on average household sizes and existing provision to support a policy and guidance that clearly sets out the quantitative and qualitative need for new sports provision relative to a new residential development and the corresponding financial contribution required.</p>

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-293
Person ID	1312373
Include files	LPSD-282 to 304-WEB-Bradshaw_Redacted.pdf
Consultee Name	Bromborough Riverside Regeneration
Position	
Company / Organisation	Bromborough Riverside Regeneration Ltd
Agent ID	1311661
Agent Name	Andrew Bradshaw
Position	
Company / Organisation	Cre8 Land and Planning
Number	Policy WS 5.4
Title	Ecological Networks
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 5.4
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer to attachment. Bromborough Riverside Regeneration Ltd support the general position of the policy in relation to the need for proposals to protect the biodiversity assets of the Borough as well as the aspiration to deliver a 10% biodiversity net gain. However, .. see below

<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>Further clarity is required in relation to the position on determining whether recent detrimental change or damage to the biodiversity value of a site has occurred as it relates to the need to undertake general site management to include the removal of invasive species. In addition, the policy makes no reference to the ability to make a financial contribution to support the delivery of the 10% biodiversity net gain off-site and we would suggest such a provision is included within the wording of the policy.</p>

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-294
Person ID	1312373
Include files	LPSD-282 to 304-WEB-Bradshaw_Redacted.pdf
Consultee Name	Bromborough Riverside Regeneration
Position	
Company / Organisation	Bromborough Riverside Regeneration Ltd
Agent ID	1311661
Agent Name	Andrew Bradshaw
Position	
Company / Organisation	Cre8 Land and Planning
Number	Policy WS 5.5
Title	Mitigating Recreational Disturbance on International Sites for Nature Conservation
To which part of the Local Plan does this representation relate?	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 5.5
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	Please refer to Attachment. Bromborough Riverside Regeneration Ltd supports the policy to protect and mitigate any adverse effects on European Designated Sites for Nature Conservation subject to the detail of the mitigation measures to be set out in the LCR Recreational Disturbance Avoidance and Mitigation Strategy (RMS).
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>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-295
Person ID	1312373
Include files	LPSD-282 to 304-WEB-Bradshaw_Redacted.pdf
Consultee Name	Bromborough Riverside Regeneration
Position	
Company / Organisation	Bromborough Riverside Regeneration Ltd
Agent ID	1311661
Agent Name	Andrew Bradshaw
Position	
Company / Organisation	Cre8 Land and Planning
Number	Policy WS 6.1
Title	Placemaking Principles
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 6.1
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	<p>Please refer to attachment.</p> <p>Bromborough Riverside Regeneration Ltd support the policy on placemaking principles as they mirror our own approach and commitment to deliver a high-quality development on the land at Bromborough Wharf. Our proposals for the site have been informed by a robust and detailed assessment of the site's opportunities and constraints through the preparation of a number of supporting technical reports to include ground, flood risk, noise and air quality, transport, ecology, heritage and crime impact assessments as well as extensive consultation with the local community and key stakeholders on the proposals. The proposals are underpinned by a number of key design/development principles as follows:</p> <p>Provide a mix of house types and tenures to meet the needs of the local community to include first time buyers, families and older persons</p> <p>Primary vehicle access from Dock Road South and Riverbank Road</p> <p>A hierarchy of permeable streets and routes as part of a connected network that promote pedestrian safety and support a positive approach to Place Making</p> <p>Creation of a network of accessible public open space to include places for gathering, play for all ages, biodiversity and facilities for outdoor exercise</p> <p>Architecture style to be influenced by local character, be coordinated throughout the site and contribute to place-making</p> <p>Creation of entrance gateways to give a sense of arrival and create a sense of place</p> <p>Creation of species rich habitats within the areas of new and retained open space to promote biodiversity</p> <p>Integration of Sustainable Urban Drainage within site infrastructure.</p>
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective	

<p>* Not Consistent with National Policy</p>	
<p>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</p>	
<p>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</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>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p>	<p>No, I do not wish to participate in hearing session(s)</p>

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

Comment ID	LPSD-296
Person ID	1312373
Include files	LPSD-282 to 304-WEB-Bradshaw_Redacted.pdf
Consultee Name	Bromborough Riverside Regeneration
Position	
Company / Organisation	Bromborough Riverside Regeneration Ltd
Agent ID	1311661
Agent Name	Andrew Bradshaw
Position	
Company / Organisation	Cre8 Land and Planning
Number	Policy WS 6.3
Title	Masterplan Areas
To which part of the Local Plan does this representation relate?	Policy
<ul style="list-style-type: none"> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment 	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 6.3
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer to attachment. Bromborough Riverside Regeneration Ltd has worked closely with the adjoining landowner Grammont Group to develop a shared vision to support the comprehensive redevelopment of the whole site based on an integrated masterplan and common set of design objectives, and therefore.. see below

<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>suggest that the policy is amended to remove the requirement to agree a masterplan and design code prior to the submission of a planning application, but rather as a requirement that a comprehensive masterplan is submitted as part of a planning application to demonstrate how the proposals will deliver the coordinated and comprehensive redevelopment of the whole site in the context of the wider area. his is the approach that has been undertaken as part of the submitted live outline planning applications for both the Bromborough Wharf West and Bromborough Wharf East sites based on an illustrative masterplan and set of design/development parameters to be agreed as part of the planning application determination process.</p>

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-297
Person ID	1312373
Include files	LPSD-282 to 304-WEB-Bradshaw_Redacted.pdf
Consultee Name	Bromborough Riverside Regeneration
Position	
Company / Organisation	Bromborough Riverside Regeneration Ltd
Agent ID	1311661
Agent Name	Andrew Bradshaw
Position	
Company / Organisation	Cre8 Land and Planning
Number	Policy WS 7.1
Title	Design Principles
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 7.1
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	<p>Please refer to attachment.</p> <p>Bromborough Riverside Regeneration Ltd support the policy on design principles as they reflect our own approach and commitment to deliver a high-quality development on the land at Bromborough Wharf.</p> <p>Our proposal for the site have been informed by a robust and detailed assessment of the site's opportunities and constraints through a review of the planning and design policy context and preparation of a number of supporting technical reports to include ground, flood risk, noise and air quality, transport, ecology, heritage and crime impact assessments as well as extensive consultation with the local community and key stakeholders on the proposals. The key design principles that underpin the proposals include:</p> <p>Provide a mix of house types and tenures to meet the needs of the whole local community over its lifecycle to include first time buyers, families and older persons</p> <p>A hierarchy of permeable streets and routes as part of a connected network that promote pedestrian safety and support a positive approach to Place Making</p> <p>Creation of a network of accessible public open space to include places for gathering, play for all ages, biodiversity and facilities for outdoor exercise</p> <p>Architecture style to be influenced by local character, be coordinated throughout the site and contribute to place-making</p> <p>An approach to scale and density that reflects the character of the site and context of adjacent uses</p> <p>An enhanced building frontage to Dock Road South to help improve the setting of the Bromborough Pool Conservation Area</p> <p>Creation of entrance gateways to give a sense of arrival and create a sense of place</p> <p>Creation of species rich habitats within the areas of new and retained open space to promote biodiversity</p> <p>Integration of Sustainable Urban Drainage within site infrastructure.</p>
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared	

* Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	
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	

<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>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>No, I do not wish to participate in hearing session(s)</p>

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

Comment ID	LPSD-298
Person ID	1312373
Include files	LPSD-282 to 304-WEB-Bradshaw_Redacted.pdf
Consultee Name	Bromborough Riverside Regeneration
Position	
Company / Organisation	Bromborough Riverside Regeneration Ltd
Agent ID	1311661
Agent Name	Andrew Bradshaw
Position	
Company / Organisation	Cre8 Land and Planning
Number	Policy WS 8.2
Title	Sustainable Construction – Energy Efficiency, Overheating and Cooling, and Water Usage
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 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	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>Please refer to attachment.</p> <p>Bromborough Riverside Regeneration Ltd support the general approach to sustainable construction set out in the policy based on a stepped approach that builds in adaptability in building design to allow for retro fitting of enhanced technology as it becomes more cost effective to help future proof developments.</p> <p>Whilst we are committed to low carbon development and construction the viability of meeting the proposed Passivhaus standard for space heating demand for residential development of 35 kWh/sq.m/yr will not be viable in the short term due to high construction costs associated with developing on a brownfield site with a legacy of industrial use as well as the current high construction/material costs.</p>

	We believe a more balanced and realistic approach is needed that takes account of the higher costs of delivering development on brownfield sites as well as other cost constraints with the policy amended to reflect a stepped/proportionate approach to delivery such as only requiring a specific percentage of properties to meet the target space heat demand standard by a specific date stepping up to the full standard by 2041.
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	policy amended to reflect a stepped/proportionate approach to delivery such as only requiring a specific percentage of properties to meet the target space heat demand standard by a specific date stepping up to the full standard by 2041.

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),

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

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

Comment ID	LPSD-299
Person ID	1312373
Include files	LPSD-282 to 304-WEB-Bradshaw_Redacted.pdf
Consultee Name	Bromborough Riverside Regeneration
Position	
Company / Organisation	Bromborough Riverside Regeneration Ltd
Agent ID	1311661
Agent Name	Andrew Bradshaw
Position	
Company / Organisation	Cre8 Land and Planning
Number	Policy WS 8.4
Title	On site Renewable and Low Carbon Energy
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 8.4
Please state which Site ID/Reference this representation relates to.	

<p>Please state which Policies Map (Inset Map number(s)) this representation relates to.</p>	
<p>Legally compliant * Yes * No</p>	
<p>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</p>	
<p>Sound * Yes * No</p>	Yes
<p>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</p>	<p>Please refer attachment.</p> <p>Bromborough Riverside Regeneration Ltd supports the delivery of low carbon development and will explore both the technical and financial viability of incorporating on-site renewable energy as part of the proposals for the Bromborough Wharf site at the reserved matters planning application stage.</p>
<p>If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy</p>	
<p>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</p>	

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

<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-300
Person ID	1312373
Include files	LPSD-282 to 304-WEB-Bradshaw_Redacted.pdf
Consultee Name	Bromborough Riverside Regeneration
Position	
Company / Organisation	Bromborough Riverside Regeneration Ltd
Agent ID	1311661
Agent Name	Andrew Bradshaw
Position	
Company / Organisation	Cre8 Land and Planning
Number	Policy WS 9.2
Title	Accessibility and Sustainable Transport
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 9.2
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	Please refer attachment Bromborough Riverside Regeneration Ltd support the policy on delivering accessible and sustainable transport and in the development of the proposals for the site have adopted a best practice approach as set out in Manual for Streets 2 based on a multi model hierarchy that prioritises walking, cycling and public transport. As part of the proposals a network of permeable streets and routes is proposed that connects to the existing highway and footpath/cycleway network to encourage walking and cycling to key destinations including local shops, schools, healthcare facilities and open space including the River Mersey coastal path. In addition, the scheme will support the improvement of local bus services through the diversion of the 38-bus route through the site and from additional patronage from the new residential population.
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be	

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

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

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

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

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

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

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