

Comment ID	LPSD-301
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 10.1
Title	Provision of 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 10.1
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer attachment. Bromborough Riverside Regeneration Ltd supports the thrust of the policy that requires new development proposals to demonstrate that there is sufficient appropriate infrastructure capacity to support the development and to provide on-site provision or/and a financial contribution to enhance existing provision to mitigate the impact of the development. In the case of the Bromborough Wharf site referred to as the Former D1 Oils site in the Draft Local Plan under the site-specific Policy WP4.2: RES–SA4.7 and Appendix A of the Infrastructure Delivery Plan a schedule of infrastructure requirements/contributions are identified to include: U17 Utilities - Developer contribution for sewers

	<p>U18 Utilities - EHV substation EHV</p> <p>TR-AT36 Transport – Subsidised bus service</p> <p>TR-AT37 Transport – Thermal Road Bus Stops</p> <p>TR-AT38 Transport – Riverside path to support a continuous route around the coast</p> <p>TR-AT39 Transport - Controlled pedestrian crossing facilities at the junction of Thermal Rd/Dock Road South</p> <p>TR-AT40 Transport – Controlled pedestrian crossing facilities at the junction of Port Causeway/New Chester Road, Bromborough</p> <p>TR-AT41 Transport – Toucan Crossing Port Causeway/ Thermal Road</p> <p>TR-AT42 Transport – Dock Road South Footway</p> <p>TR-AT43 Transport - Dock Road South Cycleway</p> <p>S2 Sport and Leisure - Playing Pitch Contribution for site allocation</p> <p>OS19 Open Space - 0.4ha for children's play</p> <p>OS20 Open Space - Developer contribution for open space for site allocation</p> <p>E8 Education – Primary School Places</p> <p>Two complementary and coordinated outline planning applications have been submitted for the Bromborough Wharf site by the landowners Bromborough Riverside Regeneration Ltd and Grammont Group to include detailed technical assessments and a single combined Environmental Impact assessment of the proposals.</p> <p>The outcome of the assessments and proposals submitted as part of the outline planning applications support the need for both the upgrade of existing infrastructure and new infrastructure to deliver the proposals on the site. However (see Q6 for main mod)</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</p>	

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>Bromborough Riverside Regeneration Ltd do not support the need or estimated costs/contributions of all the itemised infrastructure requirements set out in Appendix A of the Infrastructure Delivery Plan.</p> <p>We 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>
If your representation is seeking a	No, I do not wish to participate in hearing session(s)

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

Comment ID	LPSD-302
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 10.4
Title	Facilities for Education, Health and Emergency Services
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 10.4
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	<p>Please refer attachment</p> <p>Bromborough Riverside Regeneration Ltd supports the need to contribute to existing education and health facilities where additional need/capacity is assessed to be required as a result of new residential development.</p> <p>In the case of the Bromborough Wharf site an assessment of both primary and secondary school need generated by the proposed development against the existing capacity within a 3km/2 mile radius was undertaken as part of the supporting environmental impact assessment.</p> <p>This shows that based on the estimated new resident population created by the proposals there will be approximately 148 people of primary school age aged between 5-10 and 288 people of secondary school age 10-19 against an identified capacity within existing schools located within a 3km radius of 230 pupil places within existing primary schools without expansion and a capacity of 350 pupil places within the existing secondary schools.</p> <p>Therefore, based on the analysis above there is sufficient capacity within both the existing primary and secondary schools located within a 3 km radius to absorb the predicted number of school age children from the development.</p> <p>The difference between the approach undertaken to determine the existing capacity and need for school places undertaken as part of the planning application proposals for the Bromborough Wharf site and the approach identified within Appendix 10 of the Draft Local Plan relates to how pupil yield is calculated and significantly the maximum walking distance for school journeys.</p> <p>In relation to pupil yield the methodology undertaken as part of the planning applications is based on an analysis of the population age groups for primary and secondary school aged pupils using the 2011 Census as a baseline to estimate the number of pupils against the ONS population projects over up to 2030 the estimated completion date of the development. This differs from the approach used by Wirral Council to estimate the pupil yield from new residential developments and clarity on the correct methodology is needed.</p> <p>The key issue to determine capacity for both primary and secondary school places is the approach to the maximum walking distance for school journeys. The assessment used to inform the planning application proposals as set out in the socio-economic chapter of the Environmental Statement uses a distance of 3km radius as identified as the maximum statutory walking distance as set out in the Department of Education Home to School travel and Transport Statutory Guidance 2014 (updated 2017).</p> <p>We hold that the maximum walking distance to determine need/capacity for both education facilities should use the Department of Education guidance on statutory maximum walking distance of 3km/2 miles rather than the CIHT Guidance of 2000m.</p>
If you consider that the Local Plan is not sound, please	

<p>indicate the reason(s) why:</p> <p>* Not Positively Prepared</p> <p>* Not Justified</p> <p>* Not Effective</p> <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</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,</p>	

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>clarity on the correct methodology to estimate the pupil yield from new residential developments is needed. key issue relating to walking distance</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-303
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 WP 4.2
Title	Residential Sites
To which part of the Local Plan does this representation relate?	Site
<ul style="list-style-type: none"> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment 	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	RES-SA4.7 [MPA-SA4. 1]

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>please refer attachment.</p> <p>Bromborough Riverside Regeneration Ltd support the majority of the requirements of the policy with the exception of the need to agree a masterplan and design code with the Council in advance of the submission of any planning application as an application was submitted in June 2022 and the need for a contribution to new primary school paces as set out in the repose to Policy WS 10.4.</p> <p>In relation to the other requirements of the policy the proposals for Bromborough Riverside Regeneration and the adjacent Grammont Group site together respond positively to the specific requirements as follows:</p>

	<p>The vision for the site is to deliver the comprehensive redevelopment of the site for a new sustainable community of up to 1,200 homes and associated infrastructure and open space based on a common masterplan and design code</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 (approx. 3.0 ha) to include places for gathering, play for all ages, biodiversity and facilities for outdoor exercise</p> <p>A new river walk that connects to the wider coastal path integrated as part of a new natural landscape buffer zone to the River Mersey</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>Improved public transport access, with a sponsored bus route through the site to further reduce residents' dependency on the car</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> <p>A contribution to off-site highways and other infrastructure improvements as required subject to the outcome of the financial viability assessment.</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>Bromborough Riverside Regeneration Ltd support the majority of the requirements of the policy with the exception of the need to agree a masterplan and design code with the Council in advance of the submission of any planning application as an application was submitted in June 2022 and the need for a contribution to new primary school places as set out in the repose to Policy WS 10.4.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to</p>	<p>No, I do not wish to participate in hearing session(s)</p>

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

Comment ID	LPSD-304
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	Appendix 10
Title	Developer Contributions
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 10.3 Education and Appendix 10.8 Biodiversity Net Gain
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 Appendix 10.3 Education Bromborough Riverside Regeneration Ltd supports the need to contribute to existing education and health facilities where additional need/capacity is assessed to be required as a result of new residential development. In the case of the Bromborough Wharf site an assessment of both primary and secondary school need generated by the proposed development against the existing capacity within a 3km/2-mile radius was undertaken as part of the supporting environmental impact assessment.

	<p>This shows that based on the estimated new resident population created by the proposals there will be approximately 148 people of primary school age aged between 5-10 and 288 people of secondary school age 10-19 against an identified capacity within existing schools located within a 3km radius of 230 pupil places within existing primary schools without expansion and a capacity of 350 pupil places within the existing secondary schools.</p> <p>Therefore, based on the analysis above there is sufficient capacity within both the existing primary and secondary schools located within a 3 km radius to absorb the predicted number of school age children from the development.</p> <p>The difference between the approach undertaken to determine the existing capacity and need for school places undertaken as part of the planning application proposals for the Bromborough Wharf site and the approach identified within Appendix 10 of the Draft Local Plan relates to how pupil yield is calculated and significantly the maximum walking distance for school journeys.</p> <p>In relation to pupil yield the methodology undertaken as part of the planning applications is based on an analysis of the population age groups for primary and secondary school aged pupils using the 2011 Census as a baseline to estimate the number of pupils against the ONS population projects over up to 2030 the estimated completion date of the development. This differs from the approach used by Wirral Council to estimate the pupil yield from new residential developments and clarity on the correct methodology is needed.</p> <p>The key issue to determine capacity for both primary and secondary school places is the approach to the maximum walking distance for school journeys. The assessment used to inform the planning application proposals as set out in the socio-economic chapter of the Environmental Statement uses a distance of 3km radius as identified as the maximum statutory walking distance as set out in the Department of Education Home to School travel and Transport Statutory Guidance 2014 (updated 2017).</p> <p>We hold that the maximum walking distance to determine need/capacity for both education facilities should use the Department of Education guidance on statutory maximum walking distance of 3km/2 miles rather than the CIHT Guidance of 2000m.</p> <p>Appendix 10.8 Bio Diversity Net Gain</p> <p>Bromborough Riverside Regeneration Ltd support the requirement to deliver 10% net gain in biodiversity for all new development proposals but would request the policy make reference to the transitional arrangements for biodiversity net gain before it becomes an enforceable legal requirement as part of the Environment Act 2021 provisions for biodiversity net gain in 2023.</p> <p>In addition, further clarity is required in relation to the potential for offsetting off-site through a financial contribution where on site provision is not possible.</p>
omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying	

<p>Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>In relation to pupil yield the methodology undertaken as part of the planning applications is based on an analysis of the population age groups for primary and secondary school aged pupils using the 2011 Census as a baseline to estimate the number of pupils against the ONS population projections over up to 2030 the estimated completion date of the development.</p> <p>This differs from the approach used by Wirral Council to estimate the pupil yield from new residential developments and clarity on the correct methodology is needed.</p> <p>In addition, further clarity is required in relation to the potential for offsetting off-site through a financial contribution where on site provision is not 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>

LPSD-306

Comment ID	LPSD-306
Person ID	1249219
Include files	LPSD-306-EM-Anderson Form 1 of 5 2107_Redacted.pdf (1)
Consultee Name	The Heswall Society by Dr. Steve Anderson
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 1.1
Title	Homes
To which part of the Local Plan does this representation relate?	Policy
<ul style="list-style-type: none"> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment 	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1.1 Part B and C
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	<p>The Heswall Society is the local amenity society for the Heswall Ward. Formed just over 60 years ago by some far-sighted resident, the Society is involved in all local environmental issues including planning matters from consultation on policy, through to conservation issues and making representations on specific proposals. The Society has a membership of approximately 500 households and is still the only residents' body which encourages the best designs of houses, retail and commercial properties in order to maintain the character and distinguishing features of Heswall. The society is also a member of the Wirral Green Space Alliance (WGSA).</p> <p>The Society fully supports a Regeneration-led Local Plan with enough housing being identified for development over the local plan period, however it strongly opposes the use of an unjustified and over-inflated figure for housing need that needlessly puts Wirral's Green Belt under potential threat to unneeded and unwarranted development.</p> <p>The Local Plan Inspection guidance states that the Local Plan must "be based on up-to-date evidence". Wirral's Draft Local Plan Housing Need Figure of 13,360 houses, however, uses the standard method and is based on out-of-date 2014 Office of National Statistics data, which has been widely discredited. Exhaustive studies by WGSA experts and other independent experts have clearly proven that using this out of date data provides a vastly inflated Housing Need Figure.</p> <p>Despite being presented with this evidence, the Council has refused to consider an alternative approach and has never produced or published its own 'Objectively Assessed Need' (OAN). This is despite:</p> <ul style="list-style-type: none"> i. successive Housing Ministers, including the Rt Hon Kit Malthouse MP, saying local planning authorities may deviate from the 'Standard Method' where there are 'exceptional circumstances'; ii. the Standard Method employing out-of-date and discredited 2014 Data (on Population, Trends, Households, etc.) and uplifts results in a housing requirement of three to four times the amount that is actually necessary (or that derived using WMBC's own Admin-istrative Data). iii. A report by the eminent demographer Professor Ludi Simpson of the University of Manchester (appointed by Liverpool University who were directly engaged by WMBC), identified the use of the Standard Method and the Office of National Statistics (ONS) 2014-based data as an 'inappropriate outlier'. Prof Simson's opinion accords with the work done by the WGSA's own expert and member, Professor David Gregg. (The should soon to be available CENSUS 2021 data is likely to support the findings of both Prof Simpson and Prof Gregg). <p>The Council progressed with the Standard Method without referring at any time to Prof Simpson's or Prof Gregg's findings, conclusions, and recommendations.</p> <ul style="list-style-type: none"> iv. Wirral's geography is that of a peninsula with water on three sides, it is physically constrained, and has considerable brownfield land in need of regeneration; v. Much of Wirral is protected by international, national and local environmental designations, and important habitats and the priority species that depend on them must be legally protected; <p>NPPF paragraph 61, states that "To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless 'exceptional circumstances' justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local 'housing need' figure, any needs that cannot be met within neighbouring areas should also be considered in establishing the amount of housing to be planned for."</p> <p>Given all the above factors, the Heswall Society is firmly of the view that 'Exceptional Circumstances' are justified in the case of Wirral and are a reason to deviate from the use of Standard Method employing 2014 Data.</p> <p>Given the significant disparity between the Draft Local Plan 13,360 Housing Figure and the experts' detailed scenario calculations, averaging circa 4,300 houses, we respectfully request that the Local Plan Inspector consider a "Main Modification" to the Local Plan, to reduce the Housing Need Figure to reflect one which is based on realistic and up to date evidence. This would reflect the actual and predicted future situation on Wirral and would avoid needlessly threatening any potential threat to Green Belt release to satisfy the current unjustified and overinflated predicted housing demand.</p> <p>The Society believes that the Council did not properly consider the need for Wirral to use an alternative method and, by not deviating, it is planning for many more houses than it should. This failure may well increase the likelihood of the Council returning to a situation where it fails the (artificially high) Housing Delivery Test (having achieved in the last two rounds 96% and 99% of a Delivery Figure much lower than that which would arise from the inflated Housing Need figure in the DLP), weakening the Council's resolve to resist and refuse Greenspace/Green Belt release and development, which would result in twin harms: harm to protected greenspace and the stalling of the much-needed regeneration of deprived areas. (Wirral's Green Belt was closely defined in the past exactly to ensure regeneration).</p>

	<p>Wirral has more than sufficient available and deliverable brownfield land far exceeding the extent required for delivery of Wirral's real Housing Need, located appropriately, and in line with the 5th Purpose of Green Belt [(e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.] and the commitment by all LAs within the former Merseyside County Council – to maintain tightly-drawn Green Belt boundaries on Wirral specifically to overcome past failures to regenerate the deprived areas to the east and north – also a commitment and Aim of the full Liverpool City Region (LCR).</p> <p>Also, the Climate Change Emergency and other international political issues mean that it is more important than ever to safeguard our farmland for food production and to preserve our green spaces to mitigate against extreme weather events. Wirral's Green Belt farmland is largely 'productive' agricultural farmland with B&MV soils, A Motion by Council recognised this by declaring that the Council would not release any 'productive farmland' for development, in line with its declared 'Climate Emergency' and now also in line with Government statements of intent to protect farmland for essential future Food Security.</p> <p>Supply Side issues – linked to WS1.1 Part C</p> <p>In addition and linked to housing delivery are the following inaccurate housing need calculations:</p> <ul style="list-style-type: none"> • The Council has underestimated its allowance for Net Conversions and Changes of Use. Allowance for net conversions and change of use should be increased due to the Covid pandemic, changes in retail and other market uncertainties and the Government loosening permitted development rights to support the reuse of empty buildings for housing. • The windfall allowance should be increased. The Council should have an accurate and up to date record of suitable brownfield sites. In a cursory study, the WGSA has identified over 59 hectares of brownfield land relating to six sites that had not been included as 'suitable' sites on the Council's Brownfield Register. • The level of housing vacancy and capacity for 'Empty Homes back into Use' is underplayed in the Plan. It is understood that there are around 150,000 dwellings on Wirral with some 5,000 classed as 'vacant', equal to a rate of 3.3%, which is over 30% higher than the national average of 2.5%. It is not clear why only 90 dwellings per annum is specified when the figure of 238 dwellings has been successfully achieved in 2016/17 and 2017/18, and well over 200 net additions each and every year over the last decade, and there are both continued Council commitment and a massive supply of suitable properties, much greater than that required to supply the full Plan Period. <p>If an inflated housing requirement is adopted it will result in more land than is in reality needed being used for housing delivery and it will unnecessarily put pressure on land currently protected by planning and environmental designations being released.</p> <p>Wirral is a peninsula. The area is renowned for its special habitats and rare species. The environmental designations are a key strength of Wirral, attracting visitors all year round to enjoy nature. These should not be put needlessly at risk using out of date methodology or ONS figures. These are some of the "Exceptional Circumstances" as to why the "Standard Methodology for Calculating Housing Need" in conjunction with out-of-date and discredited 2014 ONS Data is inappropriate and leads to an inflated housing requirement, at a magnitude of three to four times what it should really be.</p> <p>The Heswall Society therefore calls for a 'Main Modification' to adopt a more realistic housing need figure and an early review of the housing need figure to provide confidence to all stakeholders that the Local Plan will deliver enough needed homes in the most sustainable locations in the future.</p> <p>For clarity, the Society and WGSA would support an evidenced 'policy-on' 'Housing Requirement' somewhat higher than the true (much lower) 'Housing Need', the latter being of the order of just 4,300 net additional homes overall across the 16-Year Local Plan (equivalent to 269 dwellings per annum), a figure derived and agreed by most independent Population and Housing experts, and supported by Wirral's Local Administrative Data. This would recognised, however, that it is necessary to build in a contingency to make allowances for the potential that sites may not come forward at the pace expected. Such a contingency, however, would make the final figure adopted much closer to the 'true' housing need figure and nowhere near the current proposed figure of 13,360.</p>
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.	

<p>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</p> <ul style="list-style-type: none"> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy 	<p>Not Justified Not Effective</p>
<p>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</p>	<p>The Heswall Society is the local amenity society for the Heswall Ward. Formed just over 60 years ago by some far-sighted resident, the Society is involved in all local environmental issues including planning matters from consultation on policy, through to conservation issues and making representations on specific proposals. The Society has a membership of approximately 500 households and is still the only residents' body which encourages the best designs of houses, retail and commercial properties in order to maintain the character and distinguishing features of Heswall. The society is also a member of the Wirral Green Space Alliance (WGSA).</p> <p>The Society fully supports a Regeneration-led Local Plan with enough housing being identified for development over the local plan period, however it strongly opposes the use of an unjustified and over-inflated figure for housing need that needlessly puts Wirral's Green Belt under potential threat to unneeded and unwarranted development.</p> <p>The Local Plan Inspection guidance states that the Local Plan must "be based on up-to-date evidence". Wirral's Draft Local Plan Housing Need Figure of 13,360 houses, however, uses the standard method and is based on out-of-date 2014 Office of National Statistics data, which has been widely discredited. Exhaustive studies by WGSA experts and other independent experts have clearly proven that using this out of date data provides a vastly inflated Housing Need Figure.</p> <p>Despite being presented with this evidence, the Council has refused to consider an alternative approach and has never produced or published its own 'Objectively Assessed Need' (OAN). This is despite:</p> <ul style="list-style-type: none"> i. successive Housing Ministers, including the Rt Hon Kit Malthouse MP, saying local planning authorities may deviate from the 'Standard Method' where there are 'exceptional circumstances'; ii. the Standard Method employing out-of-date and discredited 2014 Data (on Population, Trends, Households, etc.) and uplifts results in a housing requirement of three to four times the amount that is actually necessary (or that derived using WMBC's own Admin-istrative Data). iii. A report by the eminent demographer Professor Ludi Simpson of the University of Manchester (appointed by Liverpool University who were directly engaged by WMBC), identified the use of the Standard Method and the Office of National Statistics (ONS) 2014-based data as an 'inappropriate outlier'. Prof Simson's opinion accords with the work done by the WGSA's own expert and member, Professor David Gregg. (The should soon to be available CENSUS 2021 data is likely to support the findings of both Prof Simpson and Prof Gregg). <p>The Council progressed with the Standard Method without referring at any time to Prof Simpson's or Prof Gregg's findings, conclusions, and recommendations.</p> <ul style="list-style-type: none"> iv. Wirral's geography is that of a peninsula with water on three sides, it is physically constrained, and has considerable brownfield land in need of regeneration; v. Much of Wirral is protected by international, national and local environmental designations, and important habitats and the priority species that depend on them must be legally protected; <p>NPPF paragraph 61, states that "To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless 'exceptional circumstances' justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local 'housing need' figure, any needs that cannot be met within neighbouring areas should also be considered in establishing the amount of housing to be planned for."</p> <p>Given all the above factors, the Heswall Society is firmly of the view that 'Exceptional Circumstances' are justified in the case of Wirral and are a reason to deviate from the use of Standard Method employing 2014 Data.</p> <p>Given the significant disparity between the Draft Local Plan 13,360 Housing Figure and the experts' detailed scenario calculations, averaging circa 4,300 houses, we respectfully request that the Local Plan Inspector consider a "Main Modification" to the Local Plan, to reduce the Housing Need Figure to reflect one which is based on realistic and up to date evidence. This would reflect the actual and predicted future situation on Wirral and would avoid needlessly threatening any potential threat to Green Belt release to satisfy the current unjustified and overinflated predicted housing demand.</p> <p>The Society believes that the Council did not properly consider the need for Wirral to use an alternative method and, by not deviating, it is planning for many more houses than it should. This failure may well increase the likelihood of the Council returning to a situation where it fails the (artificially high) Housing Delivery Test (having achieved in the last two rounds 96% and 99% of a Delivery Figure much lower than that which would arise from the inflated Housing Need figure in the DLP), weakening the Council's resolve to resist and refuse Greenspace/Green</p>

	<p>Belt release and development, which would result in twin harms: harm to protected greenspace and the stalling of the much-needed regeneration of deprived areas. (Wirral's Green Belt was closely defined in the past exactly to ensure regeneration).</p> <p>Wirral has more than sufficient available and deliverable brownfield land far exceeding the extent required for delivery of Wirral's real Housing Need, located appropriately, and in line with the 5th Purpose of Green Belt [(e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.] and the commitment by all LAs within the former Merseyside County Council – to maintain tightly-drawn Green Belt boundaries on Wirral specifically to overcome past failures to regenerate the deprived areas to the east and north – also a commitment and Aim of the full Liverpool City Region (LCR).</p> <p>Also, the Climate Change Emergency and other international political issues mean that it is more important than ever to safeguard our farmland for food production and to preserve our green spaces to mitigate against extreme weather events. Wirral's Green Belt farmland is largely 'productive' agricultural farmland with B&MV soils, A Motion by Council recognised this by declaring that the Council would not release any 'productive farmland' for development, in line with its declared 'Climate Emergency' and now also in line with Government statements of intent to protect farmland for essential future Food Security.</p> <p>Supply Side issues – linked to WS1.1 Part C</p> <p>In addition and linked to housing delivery are the following inaccurate housing need calculations:</p> <ul style="list-style-type: none"> • The Council has underestimated its allowance for Net Conversions and Changes of Use. Allowance for net conversions and change of use should be increased due to due to the Covid pandemic, changes in retail and other market uncertainties and the Government loosening permitted development rights to support the reuse of empty buildings for housing. • The windfall allowance should be increased. The Council should have an accurate and up to date record of suitable brownfield sites. In a cursory study, the WGSA has identified over 59 hectares of brownfield land relating to six sites that had not been included as 'suitable' sites on the Council's Brownfield Register. • The level of housing vacancy and capacity for 'Empty Homes back into Use' is underplayed in the Plan. It is understood that there are around 150,000 dwellings on Wirral with some 5,000 classed as 'vacant', equal to a rate of 3.3%, which is over 30% higher than the national average of 2.5%. It is not clear why only 90 dwellings per annum is specified when the figure of 238 dwellings has been successfully achieved in 2016/17 and 2017/18, and well over 200 net additions each and every year over the last decade, and there are both continued Council commitment and a massive supply of suitable properties, much greater than that required to supply the full Plan Period. <p>If an inflated housing requirement is adopted it will result in more land than is in reality needed being used for housing delivery and it will unnecessarily put pressure on land currently protected by planning and environmental designations being released.</p> <p>Wirral is a peninsula. The area is renowned for its special habitats and rare species. The environmental designations are a key strength of Wirral, attracting visitors all year round to enjoy nature. These should not be put needlessly at risk using out of date methodology or ONS figures. These are some of the "Exceptional Circumstances" as to why the "Standard Methodology for Calculating Housing Need" in conjunction with out-of-date and discredited 2014 ONS Data is inappropriate and leads to an inflated housing requirement, at a magnitude of three to four times what it should really be.</p> <p>The Heswall Society therefore calls for a 'Main Modification' to adopt a more realistic housing need figure and an early review of the housing need figure to provide confidence to all stakeholders that the Local Plan will deliver enough needed homes in the most sustainable locations in the future.</p> <p>For clarity, the Society and WGSA would support an evidenced 'policy-on' 'Housing Requirement' somewhat higher than the true (much lower) 'Housing Need', the latter being of the order of just 4,300 net additional homes overall across the 16-Year Local Plan (equivalent to 269 dwellings per annum), a figure derived and agreed by most independent Population and Housing experts, and supported by Wirral's Local Administrative Data. This would recognised, however, that it is necessary to build in a contingency to make allowances for the potential that sites may not come forward at the pace expected. Such a contingency, however, would make the final figure adopted much closer to the 'true' housing need figure and nowhere near the current proposed figure of 13,360.</p>
<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	<p>The Heswall Society is the local amenity society for the Heswall Ward. Formed just over 60 years ago by some far-sighted resident, the Society is involved in all local environmental issues including planning matters from consultation on policy, through to conservation issues and making representations on specific proposals. The Society has a membership of approximately 500 households and is still the only residents' body which encourages the best designs of houses, retail and commercial properties in order to maintain the character and distinguishing features of Heswall. The society is also a member of the Wirral Green Space Alliance (WGSA).</p> <p>The Society fully supports a Regeneration-led Local Plan with enough housing being identified for development over the local plan period, however it strongly opposes the use of an unjustified and over-inflated figure for housing need that needlessly puts Wirral's Green Belt under potential threat to unneeded and unwarranted development.</p>

The Local Plan Inspection guidance states that the Local Plan must "be based on up-to-date evidence". Wirral's Draft Local Plan Housing Need Figure of 13,360 houses, however, uses the standard method and is based on out-of-date 2014 Office of National Statistics data, which has been widely discredited. Exhaustive studies by WGSA experts and other independent experts have clearly proven that using this out of date data provides a vastly inflated Housing Need Figure.

Despite being presented with this evidence, the Council has refused to consider an alternative approach and has never produced or published its own 'Objectively Assessed Need' (OAN). This is despite:

- i. successive Housing Ministers, including the Rt Hon Kit Malthouse MP, saying local planning authorities may deviate from the 'Standard Method' where there are 'exceptional circumstances';
- ii. the Standard Method employing out-of-date and discredited 2014 Data (on Population, Trends, Households, etc.) and uplifts results in a housing requirement of three to four times the amount that is actually necessary (or that derived using WMBC's own Administrative Data).
- iii. A report by the eminent demographer Professor Ludi Simpson of the University of Manchester (appointed by Liverpool University who were directly engaged by WMBC), identified the use of the Standard Method and the Office of National Statistics (ONS) 2014-based data as an 'inappropriate outlier'. Prof Simpson's opinion accords with the work done by the WGSA's own expert and member, Professor David Gregg. (The should soon to be available CENSUS 2021 data is likely to support the findings of both Prof Simpson and Prof Gregg).

The Council progressed with the Standard Method without referring at any time to Prof Simpson's or Prof Gregg's findings, conclusions, and recommendations.

- iv. Wirral's geography is that of a peninsula with water on three sides, it is physically constrained, and has considerable brownfield land in need of regeneration;

- v. Much of Wirral is protected by international, national and local environmental designations, and important habitats and the priority species that depend on them must be legally protected;
- NPPF paragraph 61, states that "To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless 'exceptional circumstances' justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local 'housing need' figure, any needs that cannot be met within neighbouring areas should also be considered in establishing the amount of housing to be planned for."

Given all the above factors, the Heswall Society is firmly of the view that 'Exceptional Circumstances' are justified in the case of Wirral and are a reason to deviate from the use of Standard Method employing 2014 Data.

Given the significant disparity between the Draft Local Plan 13,360 Housing Figure and the experts' detailed scenario calculations, averaging circa 4,300 houses, we respectfully request that the Local Plan Inspector consider a "Main Modification" to the Local Plan, to reduce the Housing Need Figure to reflect one which is based on realistic and up to date evidence. This would reflect the actual and predicted future situation on Wirral and would avoid needlessly threatening any potential threat to Green Belt release to satisfy the current unjustified and overinflated predicted housing demand.

The Society believes that the Council did not properly consider the need for Wirral to use an alternative method and, by not deviating, it is planning for many more houses than it should. This failure may well increase the likelihood of the Council returning to a situation where it fails the (artificially high) Housing Delivery Test (having achieved in the last two rounds 96% and 99% of a Delivery Figure much lower than that which would arise from the inflated Housing Need figure in the DLP), weakening the Council's resolve to resist and refuse Greenspace/Green Belt release and development, which would result in twin harms: harm to protected greenspace and the stalling of the much-needed regeneration of deprived areas. (Wirral's Green Belt was closely defined in the past exactly to ensure regeneration).

Wirral has more than sufficient available and deliverable brownfield land far exceeding the extent required for delivery of Wirral's real Housing Need, located appropriately, and in line with the 5th Purpose of Green Belt [(e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.] and the commitment by all LAs within the former Merseyside County Council – to maintain tightly-drawn Green Belt boundaries on Wirral specifically to overcome past failures to regenerate the deprived areas to the east and north – also a commitment and Aim of the full Liverpool City Region (LCR).

Also, the Climate Change Emergency and other international political issues mean that it is more important than ever to safeguard our farmland for food production and to preserve our green spaces to mitigate against extreme weather events. Wirral's Green Belt farmland is largely 'productive' agricultural farmland with B&MV soils, A Motion by Council recognised this by declaring that the Council would not release any 'productive farmland' for development, in line with its declared 'Climate Emergency' and now also in line with Government statements of intent to protect farmland for essential future Food Security.

Supply Side issues – linked to WS1.1 Part C

In addition and linked to housing delivery are the following inaccurate housing need calculations:

- The Council has underestimated its allowance for Net Conversions and Changes of Use. Allowance for net conversions and change of use should be increased due to the Covid pandemic, changes in retail and other market uncertainties and the Government loosening permitted development rights to support the reuse of empty buildings for housing.
- The windfall allowance should be increased. The Council should have an accurate and up to date record of suitable brownfield sites. In a cursory study, the WGSA has identified over 59 hectares of brownfield land relating to six sites that had not been included as 'suitable' sites on the Council's Brownfield Register.
- The level of housing vacancy and capacity for 'Empty Homes back into Use' is underplayed in the Plan. It is understood that there are around 150,000 dwellings on Wirral with some 5,000 classed as 'vacant', equal to a rate of 3.3%, which is over 30% higher than the national average of 2.5%. It is not clear why only 90 dwellings per annum is specified when the figure

	<p>of 238 dwellings has been successfully achieved in 2016/17 and 2017/18, and well over 200 net additions each and every year over the last decade, and there are both continued Council commitment and a massive supply of suitable properties, much greater than that required to supply the full Plan Period.</p> <p>If an inflated housing requirement is adopted it will result in more land than is in reality needed being used for housing delivery and it will unnecessarily put pressure on land currently protected by planning and environmental designations being released.</p> <p>Wirral is a peninsula. The area is renowned for its special habitats and rare species. The environmental designations are a key strength of Wirral, attracting visitors all year round to enjoy nature. These should not be put needlessly at risk using out of date methodology or ONS figures. These are some of the "Exceptional Circumstances" as to why the "Standard Methodology for Calculating Housing Need" in conjunction with out-of-date and discredited 2014 ONS Data is inappropriate and leads to an inflated housing requirement, at a magnitude of three to four times what it should really be.</p> <p>The Heswall Society therefore calls for a 'Main Modification' to adopt a more realistic housing need figure and an early review of the housing need figure to provide confidence to all stakeholders that the Local Plan will deliver enough needed homes in the most sustainable locations in the future.</p> <p>For clarity, the Society and WGSA would support an evidenced 'policy-on' 'Housing Requirement' somewhat higher than the true (much lower) 'Housing Need', the latter being of the order of just 4,300 net additional homes overall across the 16-Year Local Plan (equivalent to 269 dwellings per annum), a figure derived and agreed by most independent Population and Housing experts, and supported by Wirral's Local Administrative Data. This would recognised, however, that it is necessary to build in a contingency to make allowances for the potential that sites may not come forward at the pace expected. Such a contingency, however, would make the final figure adopted much closer to the 'true' housing need figure and nowhere near the current proposed figure of 13,360.</p>
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	<p>If an inflated housing requirement is adopted in the Local Plan, there are impacts to the Sustainability Appraisal in that there will be pressure by developers on Green Belt land previously considered but rejected for development for these decisions to reversed.</p> <p>This is likely to incur harm to the important planning and environmental designations that protect land of significance in terms of climate emergency goals and biodiversity net gain. It is incumbent on the local plan process to support the identification of land that is sustainable to deliver future development requirements.</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>As above, if an inflated housing requirement is adopted in the Local Plan, there are impacts for the Habitats Regulation Assessment, in that there will be pressure by developers on Green Belt land previously considered but rejected for development for these decisions to reversed.</p> <p>This is likely to incur harm to the important planning and environmental designations that protect land of significance in terms of climate emergency goals and biodiversity net gain. It is incumbent on the local plan process to support the identification of land that is sustainable to deliver future development requirements, avoiding land protected under the Habitats Regulations Assessment.</p>
Please set out the modification(s) you	Recommended wording:

<p>consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>(although the Heswall Society along with the WGSA call for a 'Main Modification' regarding issues and consequences around the highly inflated 'Housing Need' figure rather than a simple edit of the DLP text):</p> <p>3.15 The Borough is home to 144,596 households and expected household growth over the plan period is minimal. The annual housing need for the Borough for the period 2021- 2037 is 270 dwellings each year. The total need identified is 4,300 additional dwellings over the sixteen-year plan period.</p> <p>The housing need will be the subject of an early review of the local plan following adoption.</p> <p>(Please refer to WGSA submission for justification).</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>No, I do not wish to participate in hearing session(s)</p>
<p>If you wish to participate in the</p>	

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

Comment ID	LPSD-307
Person ID	1237567
Include files	LPSD-307,354,355,357,358,1387,1388,1389-Moffat Attachment.pdf
Consultee Name	Mr Richard Moffat
Position	Director
Company / Organisation	Hampstead Investments
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 1.1
Title	Homes
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1.1
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	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 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>Hampstead object to Policy WS1.1 in that it fails to recognise the potential offered through the redevelopment of contaminated land which where there is no legacy remediation in place. The plan as currently drafted is contrary to national policy and hence not sound (see above para 1.4).</p> <p>The NPPF (para 120) provides that planning policies and decisions should: - give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.</p>

omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of	<p>Policy WS 1.1 B should be revised to read as follows: - <i>The Local Plan will provide for a minimum of 13,360 net additional dwellings including new affordable dwellings. Dwellings will be delivered through:</i></p> <ol style="list-style-type: none"> 1 <i>The creation of new neighbourhoods through brownfield development: i. as part of the Regeneration Areas across the Borough, including those within Birkenhead identified on Figure 3.1; and ii. through the reuse of land previously used or allocated for employment use, including at Bromborough;</i> 2 <i>prioritizing contaminated land were no provision exists for its remediation; and</i> 3 <i>suitable sites within Settlement Areas</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><i>Allocations in Remaining Settlement Areas Figures for site within designated Neighbourhood Areas are included in Table 3.3 Further information is set out within the accompanying Wirral Local Plan Housing Delivery Strategy 2535, 1231 899 40</i></p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>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-308
Person ID	1249219
Include files	LPSD-308,758-EM-Anderson Form 2 of 5 2107_Redacted.pdf
Consultee Name	The Heswall Society by Dr. Steve Anderson
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 5
Title	Strategy for Green and Blue Infrastructure, Open Space, Biodiversity, and Landscape Protection
To which part of the Local Plan does this representation relate?	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
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.	The Heswall Society is the local amenity society for the Heswall Ward. Formed just over 60 years ago by some far-sighted resident, the Society is involved in all local environmental issues including planning matters from consultation on policy, through to conservation issues and making representations on specific proposals. The Society has a membership of approximately 500 households and is still the only residents' body which encourages the best designs of houses, retail and commercial properties in order to maintain the character and distinguishing features of Heswall. The society is also a member of the Wirral Green Space Alliance (WGSA).
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.	The Society fully supports a Regeneration-led Local Plan with enough housing being identified for development over the local plan period (although as indicated separately, it strongly opposes the use of an unjustified and over-inflated figure for housing need that needlessly puts Wirral's Green Belt under potential threat to unneeded and unwarranted 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.	

omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of	<p>The Society would like to see the Local Plan address the growing incidence of landowners and developers stripping sites in order to lower the base line of Biodiversity ahead of any required 'net gain'. The Local Plan is stated as preparing for the requirements regarding Biodiversity Net Gain in the forthcoming Environment Act 2021 but the Society feels that the above issue is not satisfactorily covered. Stripping land prior to any planning application is exacerbated by the full prohibitions and penalties within the new Act not coming into force until late 2023.</p> <p>Also, although paragraph 3.142 makes mention of "in the rare case of a site being subject to recent damage or detrimental change then the most recent survey undertaken before the change, or an appropriate habitat from a typology will be applied as the base line from which net gain is calculated". Firstly, such instances are far from rare and need to be addressed now. Secondly, the Local Plan wording needs to make it clear that this provision is to apply independently from the provisions of the new Act coming into force. The Society also requests</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>that the wording of Para 3.142 be modified so the provision is not only dependent on any actual “recent survey” but can include other forms of documentary evidence including ‘historical images’ in Google Earth, photographic evidence, local resident statements, etc.</p> <p>The Society requests that the Council brings in as soon as possible, in line with a number of other Councils, immediate interim Local Policies to address this awful practice head-on. This measure should be not only be built into this Local Plan but also into Local Policies as soon as possible so that ‘Net Gains’ would then apply to the Biodiversity Base Level existing before any action is taken on site.</p>
<p>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-309
Person ID	1249219
Include files	LPSD-309-EM-Anderson Form 3 of 5 2107_Redacted.pdf
Consultee Name	The Heswall Society by Dr. Steve Anderson
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?	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.	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.	<p>The Heswall Society is the local amenity society for the Heswall Ward. Formed just over 60 years ago by some far-sighted resident, the Society is involved in all local environmental issues including planning matters from consultation on policy, through to conservation issues and making representations on specific proposals. The Society has a membership of approximately 500 households and is still the only residents' body which encourages the best designs of houses, retail and commercial properties in order to maintain the character and distinguishing features of Heswall. The society is also a member of the Wirral Green Space Alliance (WGSA).</p> <p>The Society fully supports a Regeneration-led Local Plan with enough housing being identified for development over the local plan period (although as indicated separately, it strongly opposes the use of an unjustified and over-inflated figure for housing need that needlessly puts Wirral's Green Belt under potential threat to unneeded and unwarranted development). The 'Introduction' and 'The Development and Regeneration Strategy' (Paras 3.1 to 3.5 inclusive) are strongly supported by the Society (and the WGSA).</p>
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	<p>The Society agrees that areas of the east of the Peninsula and Birkenhead in particular has been in decline for several decades and unless the particular issues of deprivation and housing market failure are addressed, this deterioration will continue. It is important that there is a concerted effort on regeneration and the opportunity to address passed failure is not passed up. The focus needs to be on developing brownfield sites together with regenerating these deprived areas and avoid diluting the focus by allowing building on Green Belt which, of course, is what Landowners and Developers are seeking. The Society's strong support for this Regeneration-led Local Plan (with the exception of the inflated and confused 'Housing Need' figure) recognises that the scale of long-term deprivation and decline of particularly the east and north of the Peninsula and disparity east-to-west are so great and in need of urgent action that they deserve total attention to redress. Wirral's Green Belt was tightly defined in the past exactly to promote regeneration. This is equally true today and is also a commitment and aim of the full Liverpool City Region (LCR).</p> <p>The Council have shown that the quantity of available and deliverable 'brownfield' land far exceeds the extent required for delivery of Wirral's real 'Housing Need' and is in concert with the 5th Purpose of Green Belt [(e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</p> <p>The Society recognises the high levels of multiple deprivation particularly in the east of the Peninsula which has existed for many years. This is a disgrace as is the huge disparity across the Wirral and demands immediate attention and prioritising to the exclusion of other interests and agendas. Such are the levels of deprivation and disparity that they feature highly in national statistics and must constitute exceptional circumstances, including the 'Exceptional Circumstances' required to depart from the calculation of 'Housing Need' using the (discredited and to be abandoned) 'Standard Method'.</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</p> <p>* Yes</p> <p>* No</p>	Yes
<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>The great hope of the Society is that the worthiness and practicality of this current Draft Local Plan may be realised and supported by the Local Plan Inspectorate albeit with a 'Main Modification' addressing the scale of the inflated 'Housing Need'.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? * No, I do not wish to participate in hearing session(s)</p>	<p>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-310
Person ID	1312372
Include files	LPSD-310-312, 314-319, 321-329, 331, 333, 334, 336 and 337-WEB-Bradshaw_redacted.pdf
Consultee Name	Grammont Group
Position	
Company / Organisation	Grammont Group
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/para 2.38
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 Grammont Group 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-311
Person ID	1312372
Include files	LPSD-310-312, 314-319, 321-329, 331, 333, 334, 336 and 337-WEB-Bradshaw_redacted.pdf
Consultee Name	Grammont Group
Position	
Company / Organisation	Grammont Group
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.	WS 1/ WS 1.1
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	Please refer to attachment Grammont Group support the overall housing numbers identified in that the 13,360 dwellings is a minimum requirement with a recognition that its 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. 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 c. 50% of new housing within the 'other settlement areas' that includes the Bromborough Neighbourhood area.
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>Grammont Group support the overall housing numbers identified in that the 13,360 dwellings is a minimum requirement with a recognition that its 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 c. 50% of new housing within the 'other settlement areas' that includes the Bromborough Neighbourhood area.</p>

<p>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>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-312
Person ID	1312372
Include files	LPSD-310-312, 314-319, 321-329, 331, 333, 334, 336 and 337-WEB-Bradshaw_redacted.pdf
Consultee Name	Grammont Group
Position	
Company / Organisation	Grammont Group
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? * 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 1.3
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	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	Please refer to attachment Grammont Group 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.
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>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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LPSD-313

Comment ID	LPSD-313
Person ID	1249219
Include files	LPSD-313,760-EM-Anderson Form 4 of 5 2107_Redacted.pdf
Consultee Name	The Heswall Society by Dr. Steve Anderson
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Appendix 13
Title	Local Green Space
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 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	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	The Heswall Society is the local amenity society for the Heswall Ward. Formed just over 60 years ago by some far-sighted resident, the Society is involved in all local environmental issues including planning matters from consultation on policy, through to conservation issues and making representations on specific proposals. The Society has a membership of approximately 500 households and is still the only residents' body which encourages the best designs of houses, retail and commercial properties in order to maintain the character and distinguishing features of Heswall. The society is also a member of the Wirral Green Space Alliance (WGSA).
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>The Society is fully behind the Regeneration-led Local Plan with enough housing being identified to satisfy the real housing need over the local plan period using brownfield land.</p> <p>The Society fully supports the green spaces assigned in this table as being classified as Local Green Spaces. These areas provide in varying combinations important:</p> <ul style="list-style-type: none"> • Attractive amenity and recreational areas providing areas to relax and socialise. • Wildlife havens in an urban environment providing a home for many native trees, shrubs, insects and wildlife. • Visually attractive settings within an urban environment • Area for dog walkers and walkers in general • Areas to host outdoor events organised by local business community & charities, and for community celebrations. • Calm, relaxing, traffic free areas • Safe outdoor areas for children to play <p>In addition, many of these areas are being looked after now by Friends Groups and they are carrying out programs of general improvement. In particular insect friendly planting is being adopted.</p> <p>These Local green Spaces acts as important links to other green areas in Heswall and helps to further improve Wirral's green corridor. They act as wildlife havens in an urban environment and provide a home for many native trees, shrubs, insects and wildlife</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</p> <p>* Yes</p> <p>* No</p>	Yes
<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>	

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>One area that the Society believes should however be included is OS OA 7.3 (Telegraph Road Open Space) whilst this site has been recognised as being a strategically important open space it has not been afforded the full protection of a designated Local Green Space that this site warrants.</p>
If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? * No, I do not wish to participate in hearing session(s)	<p>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-314
Person ID	1312372
Include files	LPSD-310-312, 314-319, 321-329, 331, 333, 334, 336 and 337-WEB-Bradshaw_redacted.pdf
Consultee Name	Grammont Group
Position	
Company / Organisation	Grammont Group
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.	<p>please refer to attachment</p> <p>Grammont Group 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.</p> <p>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.</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-315
Person ID	1312372
Include files	LPSD-310-312, 314-319, 321-329, 331, 333, 334, 336 and 337-WEB-Bradshaw_redacted.pdf
Consultee Name	Grammont Group
Position	
Company / Organisation	Grammont Group
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? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.2
Please state which Site ID/Reference this representation relates to.	

<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>	Please refer to attachment Grammont Group 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 East site contributing up to 622 new dwellings at average densities of 43 dwellings per hectare to include a mix of higher density apartment blocks of up to 5 storeys and lower density housing of up to 3 storeys that address the specific character of the site and market needs/demands.
<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-316
Person ID	1312372
Include files	LPSD-310-312, 314-319, 321-329, 331, 333, 334, 336 and 337-WEB-Bradshaw_redacted.pdf
Consultee Name	Grammont Group
Position	
Company / Organisation	Grammont Group
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.	

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 Grammont Group supports the policy requirements for 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>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.</p> <p>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-317
Person ID	1312372
Include files	LPSD-310-312, 314-319, 321-329, 331, 333, 334, 336 and 337-WEB-Bradshaw_redacted.pdf
Consultee Name	Grammont Group
Position	
Company / Organisation	Grammont Group
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? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.4
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
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 Grammont Group 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. The proposals for the comprehensive redevelopment of the site will deliver up to 1,200 new homes with the Bromborough East site contributing up to 622 dwellings of which 259 dwellings or 42% 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>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-318
Person ID	1312372
Include files	LPSD-310-312, 314-319, 321-329, 331, 333, 334, 336 and 337-WEB-Bradshaw_redacted.pdf
Consultee Name	Grammont Group
Position	
Company / Organisation	Grammont Group
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>Grammont Group support the policy to provide specialist housing for older people or other groups in sustainable locations as it will help to deliver a sustainable and balanced housing offer on the site and provide flexibility in terms of the housing mix that will appeal to a broader mix of potential housing partners during the disposal of 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-319
Person ID	1312372
Include files	LPSD-310-312, 314-319, 321-329, 331, 333, 334, 336 and 337-WEB-Bradshaw_redacted.pdf
Consultee Name	Grammont Group
Position	
Company / Organisation	Grammont Group
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? * 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 5.1
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 Grammont Group 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 c. 2.13 ha of new public amenity space to include a children's play area 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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LPSD-320

Comment ID	LPSD-320
Person ID	1249219
Include files	LPSD-320-EM-Anderson Form 5 of 5 2107_Redacted.pdf (1)
Consultee Name	The Heswall Society by Dr. Steve Anderson
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Appendix 12
Title	Open Space
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	Site OS-SA7.3

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	The Heswall Society is the local amenity society for the Heswall Ward. Formed just over 60 years ago by some far-sighted resident, the Society is involved in all local environmental issues including planning matters from consultation on policy, through to conservation issues and making representations on specific proposals. The Society has a membership of approximately 500 households and is still the only residents' body which encourages the best designs of houses, retail and commercial properties in order to maintain the character and distinguishing features of Heswall. The society is also a member of the Wirral Green Space Alliance (WGSA).
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>The Society fully supports a Regeneration-led Local Plan with enough housing being identified for development over the local plan period, however it strongly feels that whilst this site has been recognised as being a strategically important open space it has not been afforded the full protection of a designated Local Green Space that this site warrants.</p> <p>This grassed area provides an important visual open space to the north west of Heswall.</p> <p>It is greatly valued by residents and indeed was purchased by them in the past to prevent it being built upon. Subsequently it was passed over to the Council for them to preserve it as an important open space for the benefit of residents and those entering Heswall from a West Kirby direction.</p> <p>It currently affords an important amenity and recreational area for residents. It is visually attractive, acts as an area for dog walkers and has a number of trees that are important for wildlife. A group of fruit trees will be planted later in the year by the Society as part of the Queen's Green Canopy Project and there are more plans to increase the recreational aspect of the area.</p>

	The green space acts as an important link to other green areas in Heswall and helps to further improve Wirral's green corridor. It has a number of trees that are important for wildlife and group of fruit trees will be planted later in the year by the Society as part of the Queen's Green Canopy Project that will further benefit wildlife.
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	Recommended wording: Site OS-SA7.3 is designated as a Local Green Space and is included in Appendix 13, under section SA7 - Irby, Thingwall, Pensby, Heswall and Gayton (page 358) ie

<p>Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Reg 19 Ref</p> <p>Proposed Designation</p> <p>Site Name</p> <p>Open Space Typology</p> <p>Area</p> <p>(hectares)</p> <p>Children's Play</p> <p>OS-SA7.3</p> <p>Local Green Space</p> <p>Telegraph Road Open Space</p> <p>Amenity Greenspace</p> <p>0.50</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</p>	

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

Comment ID	LPSD-321
Person ID	1312372
Include files	LPSD-310-312, 314-319, 321-329, 331, 333, 334, 336 and 337-WEB-Bradshaw_redacted.pdf
Consultee Name	Grammont Group
Position	
Company / Organisation	Grammont Group
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.	<p>Please refer to attachment</p> <p>The policy requires new residential development to contribute to open space provision based on the provision of 37 square metres of publicly accessible open space per person, of which 2.5 square metres per person will be for equipped children's play or 80 square metres per dwelling, of which 6 square metres will be for equipped children's play; that all new dwellings should be within 720 metres safe walking distance of a publicly accessible open space or designated Tourism Area of 1.5 hectares or above; that all new dwellings should be within 400m safe walking distance of an appropriately equipped open-access facility for children's play.</p> <p>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.</p> <p>The proposals for the comprehensive redevelopment of the site will deliver approximately 3.0 ha of public amenity space with the Bromborough East site contributing c. 1.82 ha of publicly accessible open space to include children's play provision of c. 4,000 square metres alongside an additional 0.31 hectares of environmental buffer planting and therefore exceed the requirements of the policy on open space provision.</p> <p>We therefore fully support the policy on open space provision within new residential development.</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>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</p>	
<p>omplies with the Duty to co-operate * Yes * No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	

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

Comment ID	LPSD-322
Person ID	1312372
Include files	LPSD-310-312, 314-319, 321-329, 331, 333, 334, 336 and 337-WEB-Bradshaw_redacted.pdf
Consultee Name	Grammont Group
Position	
Company / Organisation	Grammont Group
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?	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 5.3
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.	Please refer to attachment The policy requires new residential development to contribute to the provision of appropriate facilities for outdoor sport and recreation in line with the needs identified per person set out within the latest Playing Pitch and Outdoor Sports Strategy for the Borough. We have reviewed the supporting Wirral Playing Pitch and Outdoor Sports Strategy published in July 2021 that includes a number of scenarios under Part 7 Housing Growth Scenarios as follows: Scenario 1: Example of likely demand generated for pitch sports from projected population growth over the Local Plan period (to 2037) – this estimates the need for 10.92 new spots pitches to meet the estimated demand from population growth equating in monetary terms to £399 per person to include changing room provision costs.

	<p>Scenario 2: Example of demand generated by new dwellings for one year – this estimates the need for 3.05 new spots pitches to meet the estimated demand from population growth equating in monetary terms to £946 per dwelling to include changing room provision costs; and</p> <p>Scenario 3: Example of demand generated for one development (100 dwellings) -- this estimates the need for 0.34 new spots pitches to meet the estimated demand from a new development of 100 houses equating in monetary terms to £1,164 per dwelling to include changing room provision costs.</p> <p>Grammont Group 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.</p> <p>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.</p> <p>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>
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>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>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-323
Person ID	1312372
Include files	LPSD-310-312, 314-319, 321-329, 331, 333, 334, 336 and 337-WEB-Bradshaw_redacted.pdf
Consultee Name	Grammont Group
Position	
Company / Organisation	Grammont Group
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 Grammont Group 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-324
Person ID	1312372
Include files	LPSD-310-312, 314-319, 321-329, 331, 333, 334, 336 and 337-WEB-Bradshaw_redacted.pdf
Consultee Name	Grammont Group
Position	
Company / Organisation	Grammont Group
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 Grammont Group 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-325
Person ID	1312372
Include files	LPSD-310-312, 314-319, 321-329, 331, 333, 334, 336 and 337-WEB-Bradshaw_redacted.pdf
Consultee Name	Grammont Group
Position	
Company / Organisation	Grammont Group
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? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 6.1
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>Grammont Group 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>A new river walk that connects to the wider coastal path integrated as part of a new natural landscape buffer zone to the River Mersey</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	

<p>* Not Effective</p> <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</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</p>	

<p>accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>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-326
Person ID	1312372
Include files	LPSD-310-312, 314-319, 321-329, 331, 333, 334, 336 and 337-WEB-Bradshaw_redacted.pdf
Consultee Name	Grammont Group
Position	
Company / Organisation	Grammont Group
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? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 6.3
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
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>The Bromborough Wharf site is identified as a defined masterplan area (Ref, Former D1 Oils site) which requires the Council to approve a masterplan, parameters, and a design code for the redevelopment of the site that must conform with the policy for the site and the National Design Standards.</p> <p>Grammont Group has worked closely with the adjoining landowner Bromborough Riverside Regeneration Ltd 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>

<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. This 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-327
Person ID	1312372
Include files	LPSD-310-312, 314-319, 321-329, 331, 333, 334, 336 and 337-WEB-Bradshaw_redacted.pdf
Consultee Name	Grammont Group
Position	
Company / Organisation	Grammont Group
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? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 7.1
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 Grammont Group 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. 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: 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 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 Creation of a network of accessible public open space to include places for gathering, play for all ages, biodiversity and facilities for outdoor exercise A new river walk that connects to the wider coastal path integrated as part of a new natural landscape buffer zone to the River Mersey Architecture style to be influenced by local character, be coordinated throughout the site and contribute to place-making An approach to scale and density that reflects the character of the site and context of adjacent uses An enhanced building frontage to Dock Road South to help improve the setting of the Bromborough Pool Conservation Area Creation of entrance gateways to give a sense of arrival and create a sense of place Creation of species rich habitats within the areas of new and retained open space to promote biodiversity Integration of Sustainable Urban Drainage within site infrastructure.
If you consider that the Local Plan is not sound, please indicate the reason(s) why:	

<p>* Not Positively Prepared</p> <p>* Not Justified</p> <p>* Not Effective</p> <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</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance,</p>	

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

<p>participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	
<p>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-328
Person ID	1312372
Include files	LPSD-310-312, 314-319, 321-329, 331, 333, 334, 336 and 337-WEB-Bradshaw_redacted.pdf
Consultee Name	Grammont Group
Position	
Company / Organisation	Grammont Group
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.	Please refer to attachment Grammont Group 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. 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.

	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-329
Person ID	1312372
Include files	LPSD-310-312, 314-319, 321-329, 331, 333, 334, 336 and 337-WEB-Bradshaw_redacted.pdf
Consultee Name	Grammont Group
Position	
Company / Organisation	Grammont Group
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? * 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 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 to attachment</p> <p>Grammont Group 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-331
Person ID	1312372
Include files	LPSD-310-312, 314-319, 321-329, 331, 333, 334, 336 and 337-WEB-Bradshaw_redacted.pdf
Consultee Name	Grammont Group
Position	
Company / Organisation	Grammont Group
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.	<p>Please refer to attachment</p> <p>Grammont Group 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.</p> <p>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.</p> <p>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.</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 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>

Comment ID	LPSD-332
Person ID	1323555
Include files	LPSD-332,335-EM-Ramblers Association Wirral Group_Redacted.pdf
Consultee Name	Ramblers Association -Wirral Group
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?	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
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 Supports the strategy of no green belt release.
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	

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

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

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

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

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

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

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

Comment ID	LPSD-333
Person ID	1312372
Include files	LPSD-310-312, 314-319, 321-329, 331, 333, 334, 336 and 337-WEB-Bradshaw_redacted.pdf
Consultee Name	Grammont Group
Position	
Company / Organisation	Grammont Group
Agent ID	1311661
Agent Name	Andrew Bradshaw
Position	
Company / Organisation	Cre8 Land and Planning
Number	Policy WS 10.1
Title	Provision of Infrastructure
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 10.1
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>Please refer to attachment</p> <p>Grammont Group supports the thrust of the policy that requires new development proposals to demonstrate that there is sufficient appropriate infrastructure capacity to support the development and to provide on-site provision or/and a financial contribution to enhance existing provision to mitigate the impact of the development.</p> <p>In the case of the Bromborough Wharf site referred to as the Former D1 Oils site in the Draft Local Plan under the site-specific Policy WP4.2: RES–SA4.7 and Appendix A of the Infrastructure Delivery Plan a schedule of infrastructure requirements/contributions are identified to include:</p> <p>U17 Utilities - Developer contribution for sewers</p>

	<p>U18 Utilities - EHV substation EHV</p> <p>TR-AT36 Transport – Subsidised bus service</p> <p>TR-AT37 Transport – Thermal Road Bus Stops</p> <p>TR-AT38 Transport – Riverside path to support a continuous route around the coast</p> <p>TR-AT39 Transport - Controlled pedestrian crossing facilities at the junction of Thermal Rd/Dock Road South</p> <p>TR-AT40 Transport – Controlled pedestrian crossing facilities at the junction of Port Causeway/New Chester Road, Bromborough</p> <p>TR-AT41 Transport – Toucan Crossing Port Causeway/ Thermal Road</p> <p>TR-AT42 Transport – Dock Road South Footway</p> <p>TR-AT43 Transport - Dock Road South Cycleway</p> <p>S2 Sport and Leisure - Playing Pitch Contribution for site allocation</p> <p>OS19 Open Space - 0.4ha for children's play</p> <p>OS20 Open Space - Developer contribution for open space for site allocation</p> <p>E8 Education – Primary School Places</p> <p>Two complementary and coordinated outline planning applications have been submitted for the Bromborough Wharf site by the landowners Grammont Group and Bromborough Riverside Regeneration Ltd to include detailed technical assessments and a single combined Environmental Impact assessment of the proposals.</p> <p>The outcome of the assessments and proposals submitted as part of the outline planning application support the need for both the upgrade of existing infrastructure and new infrastructure to deliver the proposals on the site.</p> <p>However, Grammont Group do not support the need or estimated costs/contributions of all the itemised infrastructure requirements set out in Appendix A of the Infrastructure Delivery Plan.</p> <p>We 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>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal</p>	

<p>compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised</p>	<p>However, Grammont Group do not support the need or estimated costs/contributions of all the itemised infrastructure requirements set out in Appendix A of the Infrastructure Delivery Plan.</p> <p>We 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>

wording of any policy or text. Please be as precise as possible.	
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	No, I do not 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>	Yes

Comment ID	LPSD-334
Person ID	1312372
Include files	LPSD-310-312, 314-319, 321-329, 331, 333, 334, 336 and 337-WEB-Bradshaw_redacted.pdf
Consultee Name	Grammont Group
Position	
Company / Organisation	Grammont Group
Agent ID	1311661
Agent Name	Andrew Bradshaw
Position	
Company / Organisation	Cre8 Land and Planning
Number	Policy WS 10.4
Title	Facilities for Education, Health and Emergency Services
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 10.4
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	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>Grammont Group supports the need to contribute to existing education and health facilities where additional need/capacity is assessed to be required as a result of new residential development.</p> <p>In the case of the Bromborough Wharf site an assessment of both primary and secondary school need generated by the proposed development against the existing capacity within a 3km/2 mile radius was undertaken as part of the supporting environmental impact assessment.</p> <p>This shows that based on the estimated new resident population created by the proposals there will be approximately 148 people of primary school age aged between 5-10 and 288 people of secondary school age 10-19 against an identified capacity within existing schools located within a 3km radius of 230 pupil places within existing primary schools without expansion and a capacity of 350 pupil places within the existing secondary schools.</p> <p>Therefore, based on the analysis above there is sufficient capacity within both the existing primary and secondary schools located within a 3 km radius to absorb the predicted number of school age children from the development.</p> <p>The difference between the approach undertaken to determine the existing capacity and need for school places undertaken as part of the planning application proposals for the Bromborough Wharf site and the approach identified within Appendix 10 of the Draft Local Plan relates to how pupil yield is calculated and significantly the maximum walking distance for school journeys.</p> <p>In relation to pupil yield the methodology undertaken as part of the planning applications is based on an analysis of the population age groups for primary and secondary school aged pupils using the 2011 Census as a baseline to estimate the number of pupils against the ONS population projects over up to 2030 the estimated completion date of the development. This differs from the approach used by Wirral Council to estimate the pupil yield from new residential developments and clarity on the correct methodology is needed.</p> <p>The key issue to determine capacity for both primary and secondary school places is the approach to the maximum walking distance for school journeys. The assessment used to inform the planning application proposals as set out in the socio-economic chapter of the Environmental Statement uses a distance of 3km radius as identified as the maximum statutory walking distance as set out in the Department of Education Home to School travel and Transport Statutory Guidance 2014 (updated 2017).</p> <p>We hold that the maximum walking distance to determine need/capacity for both education facilities should use the Department of Education guidance on statutory maximum walking distance of 3km/2 miles rather than the CIHT Guidance of 2000m.</p>
If you consider that the Local Plan is not sound, please	

<p>indicate the reason(s) why:</p> <p>* Not Positively Prepared</p> <p>* Not Justified</p> <p>* Not Effective</p> <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</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,</p>	

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>clarity on the correct methodology to estimate the pupil yield from new residential developments is needed. key issue relating to walking distance</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>

LPSP-335

Comment ID	LPSP-335
Person ID	1323555
Include files	LPSP-332,335-EM-Ramblers Association Wirral Group_Redacted.pdf
Consultee Name	Ramblers Association -Wirral Group
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 1.1
Title	Homes
To which part of the Local Plan does this representation relate?	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.	WS1.1
Please state which Site ID/Reference this representation relates to.	

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

<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>Lower housing figure.</p>

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

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

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

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

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

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

Comment ID	LPSD-336
Person ID	1312372
Include files	LPSD-310-312, 314-319, 321-329, 331, 333, 334, 336 and 337-WEB-Bradshaw_redacted.pdf
Consultee Name	Grammont Group
Position	
Company / Organisation	Grammont Group
Agent ID	1311661
Agent Name	Andrew Bradshaw
Position	
Company / Organisation	Cre8 Land and Planning
Number	Policy WP 4.2
Title	Residential Sites
To which part of the Local Plan does this representation relate?	Site
<ul style="list-style-type: none"> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment 	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	RES-SA4.7 [MPA-SA4. 1]

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>Grammont Group support the majority of the requirements of the policy with the exception of the need to agree a masterplan and design code with the Council in advance of the submission of any planning application as an application was submitted in June 2022 and the need for a contribution to new primary school places as set out in the response to Policy WS 10.4.</p> <p>In relation to the other requirements of the policy the proposals for Bromborough Riverside Regeneration and adjacent the Grammont Group site together respond positively to the specific requirements as follows:</p> <p>The vision for the site is to deliver the comprehensive redevelopment of the site for a new sustainable community of up to 1,200 homes and associated infrastructure and open space based on a common masterplan and design code</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 (approx. 3.0 ha) to include places for gathering, play for all ages, biodiversity and facilities for outdoor exercise</p> <p>A new river walk that connects to the wider coastal path integrated as part of a new natural landscape buffer zone to the River Mersey</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>Improved public transport access, with a sponsored bus route through the site to further reduce residents' dependency on the car</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> <p>A contribution to off-site highways and other infrastructure improvements as required subject to the outcome of the financial viability assessment.</p>
<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance,</p>	

<p>soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>support the majority of the requirements of the policy with the exception of the need to agree a masterplan and design code with the Council in advance of the submission of any planning application as an application was submitted in June 2022 and the need for a contribution to new primary school places as set out in the response to Policy WS 10.4.</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</p>	<p>No, I do not wish to participate in hearing session(s)</p>

<p>participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	
<p>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-337
Person ID	1312372
Include files	LPSD-310-312, 314-319, 321-329, 331, 333, 334, 336 and 337-WEB-Bradshaw_redacted.pdf
Consultee Name	Grammont Group
Position	
Company / Organisation	Grammont Group
Agent ID	1311661
Agent Name	Andrew Bradshaw
Position	
Company / Organisation	Cre8 Land and Planning
Number	Appendix 10
Title	Developer Contributions
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 10.3 Education and 10.8 Bio Diversity Net Gain
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 Appendix 10.3 Education Grammont Group supports the need to contribute to existing education and health facilities where additional need/capacity is assessed to be required as a result of new residential development. In the case of the Bromborough Wharf site an assessment of both primary and secondary school need generated by the proposed development against the existing capacity within a 3km/2-mile radius was undertaken as part of the supporting environmental impact assessment.

	<p>This shows that based on the estimated new resident population created by the proposals there will be approximately 148 people of primary school age aged between 5-10 and 288 people of secondary school age 10-19 against an identified capacity within existing schools located within a 3km radius of 230 pupil places within existing primary schools without expansion and a capacity of 350 pupil places within the existing secondary schools.</p> <p>Therefore, based on the analysis above there is sufficient capacity within both the existing primary and secondary schools located within a 3 km radius to absorb the predicted number of school age children from the development.</p> <p>The difference between the approach undertaken to determine the existing capacity and need for school places undertaken as part of the planning application proposals for the Bromborough Wharf site and the approach identified within Appendix 10 of the Draft Local Plan relates to how pupil yield is calculated and significantly the maximum walking distance for school journeys.</p> <p>In relation to pupil yield the methodology undertaken as part of the planning applications is based on an analysis of the population age groups for primary and secondary school aged pupils using the 2011 Census as a baseline to estimate the number of pupils against the ONS population projects over up to 2030 the estimated completion date of the development. This differs from the approach used by Wirral Council to estimate the pupil yield from new residential developments and clarity on the correct methodology is needed.</p> <p>The key issue to determine capacity for both primary and secondary school places is the approach to the maximum walking distance for school journeys. The assessment used to inform the planning application proposals as set out in the socio-economic chapter of the Environmental Statement uses a distance of 3km radius as identified as the maximum statutory walking distance as set out in the Department of Education Home to School travel and Transport Statutory Guidance 2014 (updated 2017).</p> <p>We hold that the maximum walking distance to determine need/capacity for both education facilities should use the Department of Education guidance on statutory maximum walking distance of 3km/2 miles rather than the CIHT Guidance of 2000m.</p> <p>Appendix 10.8 Biodiversity Net Gain</p> <p>Grammont Group support the requirement to deliver 10% net gain in biodiversity for all new development proposals but would request the policy make reference to the transitional arrangements for biodiversity net gain before it becomes an enforceable legal requirement as part of the Environment Act 2021 provisions for biodiversity net gain in 2023.</p> <p>In addition, further clarity is required in relation to the potential for offsetting off-site through a financial contribution where on site provision is not 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</p>	

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>In relation to pupil yield the methodology undertaken as part of the planning applications is based on an analysis of the population age groups for primary and secondary school aged pupils using the 2011 Census as a baseline to estimate the number of pupils against the ONS population projections over up to 2030 the estimated completion date of the development. This differs from the approach used by Wirral Council to estimate the pupil yield from new residential developments and clarity on the correct methodology is needed.</p> <p>In addition, further clarity is required in relation to the potential for offsetting off-site through a financial contribution where on site provision is not possible.</p>
If your representation is seeking a	No, I do not wish to participate in hearing session(s)

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

Comment ID	LPSD-340
Person ID	1323597
Include files	LPSD-340-EM-Burnett Form 1 of 2 2007_Redacted.pdf
Consultee Name	Threadneedle Property Unit Trust
Position	
Company / Organisation	
Agent ID	1323590
Agent Name	Mr. Colin Burnett
Position	
Company / Organisation	Burnett Planning
Number	Policy WS 4.2
Title	Designated Employment Areas
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 4.2
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	No
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>The Tebay Retail Park site identified on the attached Site Location Plan CBC0528-02APH-01 should be excluded from the Primarily Employment Area (PEA) on the Draft Policies Map for Bebington – South East (4 of 4). The inclusion of the Retail Park site within the PEA boundary represents an unsound and outdated approach that would maintain, without justification, the historic Primarily Industrial Area (PIA) boundary which was conceived in the 1990s when the UDP was prepared and has not been updated since the Retail Park was developed in 2007.</p> <p>The absence of reasoned justification to safeguard this site as part of the designated Primarily Employment Areas in order to create and maintain local employment and provide a range and choice of sites and premises in terms of quality, accessibility, type and size was clearly set out in the attached Appellant's Statement of Case on the appeal (APP/W4325/W/21/3282452)</p>

	<p>against refusal of a proposed change of use of Unit 1 (trade warehouse) and amalgamation with Unit 2 (retail showroom) to create a single retail unit for the sale of food and non food goods at Unit 1 & 2, Tebay Retail Park.</p> <p>In the attached appeal decision APP/W4325/W/21/3282452 the Inspector noted (at paragraph 26) that – “Emerging Policy WS4.2 of the Wirral Local Plan Submission draft proposes a similar level of protection to the UDP”</p> <p>The Inspector found (paragraph 27) that the existing bespoke mixed use development meant the site “does not therefore fit neatly into the policy promoted land uses”.</p> <p>The Inspector (paragraph 29) noted that the site had the appearance of, and functioned as, a Retail Park and “the site has numerous features that distinguish it from the nearby industrial units.”</p> <p>The Inspector (paragraphs 30 and 31) accepted that there were significant constraints on ongoing employment use in Unit 1/2 which “would make it an unattractive proposition in the market” and stated (at paragraph 32) that - “as a single combined unit, I find its bespoke arrangement would impose some limit to the range of users and its attractiveness to potential tenants. According to the appellant’s study, those established ‘trade counter’ businesses that might be attracted by the combined unit already have a presence in the locality. This is not contested by the Council.”</p> <p>The Inspector concluded (at paragraph 33) that –</p> <p>“Taken with the existing established retail uses on and adjacent to the site, the shared parking facilities, service area and absence of dedicated contained yard space, I find that the case for reintroducing alternative B-class uses is not without significant limitations. In an area that presents as retail, the potential incompatibility with the draw of public users and servicing arrangement of the adjacent units weighs heavily in favour of the development.”</p> <p>Significantly (at paragraph 35) the Inspector found that there was no need to safeguard the site for employment purposes, i.e.</p> <p>“For the above reasons, whilst I recognise that there would be a minor conflict with Policy EM8 as it seeks to maintain the supply of land for employment uses, I find the loss of part of a mixed-use site predominantly designed and laid out for direct retail purposes would not result in demonstrable harm to the supply of employment premises in the locality.”</p> <p>There is no evidence that, in order to meet the area’s objectively assessed needs, the Tebay Retail Park site should be safeguarded for employment uses and subjected to Policy WS4.2. The proposed designation of Tebay Retail Park as part of the Employment Area is not therefore positively prepared, justified, and would not be effective. It is also inconsistent with national policy, in particular conflicting with NPPF paragraph 81 which states that planning policies should help create the conditions in which businesses can invest, expand and adapt; and NPPF paragraph 122 which does not support land use allocations where, as in this case, there is no reasonable prospect of an application coming forward for the use allocated in the plan.</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</p>	

<p>relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Exclude Tebay Retail Park from the Primarily Employment Area (PEA) designation on the Draft Policies Map for Bebington – South East (4 of 4)</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>

Comment ID	LPSD-342
Person ID	1323597
Include files	LPSD-342-EM-Burnett Form 2 of 2 2007_Redacted.pdf
Consultee Name	Threadneedle Property Unit Trust
Position	
Company / Organisation	
Agent ID	1323590
Agent Name	Mr. Colin Burnett
Position	
Company / Organisation	Burnett Planning
Number	Policy WS 11.3
Title	Town and Local Centre Impact Assessments
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 11.3
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>The floorspace thresholds for impact assessments identified in Policy WS 11.3 part H are arbitrary. Paragraph 3.238 states that the thresholds are drawn from the evidence provided by the but this document is entirely silent on the matter of floorspace thresholds and presents no evidence or explanation in support of the arbitrary thresholds identified in the Policy.</p> <p>The proposed floorspace thresholds are devoid of any analysis or assessment of the considerations identified in Planning Practice Guidance Paragraph: 015 Reference ID: 2b- 015-20190722 as being important in setting locally appropriate thresholds.</p> <p>The Policy is unsound. NPPF paragraph 81 states that planning policies should help create the conditions in which businesses can invest, expand and adapt. The arbitrary and unjustifiably small floorspace thresholds that will trigger impact assessments will present an unnecessary burden on applicants contrary to the intentions of NPPF [81].</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>Delete part H and replace with NPPF floorspace threshold of 2,500sqm gross</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-345
Person ID	1323602
Include files	LPSD-345-EM-Barton Form 1 of 2 2107_Redacted.pdf LPSD-345 and 346-EM-Barton Attach 2107_Redacted.pdf
Consultee Name	Mrs Juliet Boulton
Position	
Company / Organisation	
Agent ID	1323601
Agent Name	Mr Philip Barton
Position	
Company / Organisation	Philip Barton MCD BA (Hons) MRTPI
Number	Appendix 17
Title	Environmental Designations
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.	LWS-SA5.1
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
Please give details of why you consider the Local Plan is	Please refer to attachment The proposed plan is not sound because site allocation LWS-SA5.1 (Paulsfield Drive Woodland, Overchurch) has not been adequately justified. The reasons for this are:

unsound. Please be as precise as possible.	<p>1) a substantial part of the site is severely denuded by unlawful engineering works undertaken to create an informal bicycle motocross (BMX) track. The table on page 15 of the ecological scoping study (Appendix E) indicates that more than 30% of the woodland has damaged ground; that there is limited standing deadwood, and that there is very limited regrowth;</p> <p>2) other parts of the site have been previously developed as an open air swimming pool, and nature has not reclaimed this previously developed area;</p> <p>3) the site is of low biodiversity value apart from the mature trees, all of which are protected by Tree Preservation Orders reference: BK0022A001 and WR0349W001. The trees do not require the additional protection of a Local Wildlife Site designation, and</p> <p>4) Increasing the biodiversity value of the site would be better served by allowing it to be developed for housing. It is likely that by the time an application for planning permission were to come forward under proposed Policy WD 3 Biodiversity and Geodiversity, the provisions of Section 98 and Schedule 14 of the Environment Act 2021, (which insert the new Schedule 7A into the Town & Country Planning Act 1990) will have come into force and the council will be required to attach a condition requiring biodiversity gain to be delivered. This primary legislation requires developers to increase the biodiversity value of a site such as this one by a minimum of 10%.</p>
omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	not applicable
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying	not applicable

<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>The parcel of land owned by the objector, which measures about 3,898 square metres (0.39 of a hectare) should be excluded from proposed site allocation LWS-SA5.1 and the policies map should be amended accordingly.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? * No, I do not wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>The existing biodiversity value of the site is currently being established using the latest <i>Natural England</i> biodiversity metric (currently 3.1) and supporting information for this objection will be presented to the Inspector at the inquiry.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

LPSD-346

Comment ID	LPSD-346
Person ID	1323602
Include files	LPSD-345 and 346-EM-Barton Attach 2107_Redacted.pdf LPSD-346-EM-Barton Form 2 of 2 2107_Redacted.pdf
Consultee Name	Mrs Juliet Boulton
Position	
Company / Organisation	
Agent ID	1323601
Agent Name	Mr Philip Barton
Position	
Company / Organisation	Philip Barton MCD BA (Hons) MRTPI
Number	Appendix 12
Title	Open Space
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	

Please state which Site ID/Reference this representation relates to.	OS-SA5.9
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
Please give details of why you consider the Local Plan is	Please refer to attachment The proposed plan is not sound because site allocation OS-SA5.9 (Paulsfield Drive Woodland, Overchurch) has not been adequately justified. The reasons for this are:

unsound. Please be as precise as possible.	<p>1) there is no established right of public access over that part of the proposed allocation within the ownership of the objector;</p> <p>2) the former open air swimming pool use has long been abandoned;</p> <p>3) the existing bicycle motocross (BMX) track development is unlawful and its use has been the subject of complaints by local residents;</p> <p>4) the objector's site comprises only a small part (15%) of the entire allocation and 2.25 hectares of natural/seminatural woodland would remain, and</p> <p>5) the amenity value of the site would be retained because the trees on the objector's land are protected by Tree Preservation Orders reference: BK0022A001 and WR0349W001. The council would therefore retain control over any proposed changes to the sylvan character of the site.</p>
omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	not applicable
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.	not applicable

<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>The parcel of land owned by the objector, which measures about 3,898 square metres (0.39 of a hectare) should be excluded from proposed site allocation OS-SA5.9 and the policies map should be amended accordingly.</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>Further written and/or verbal representations about the existing unlawful use of the site and the harm to amenity being caused thereby may be of assistance to the Inspector.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

Comment ID	LPSD-347
Person ID	1311854
Include files	LPSD-347-EM-Copley Form 1 of 6 2107_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	1323604
Agent Name	Ms. Jackie Copley
Position	Planning Director
Company / Organisation	CPRE Cheshire
Number	Policy WS 1.3
Title	Infrastructure
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	Para 3.29 to 3.32
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	Wirral Green Space Alliance (WGSA), a consortium of over 30 local campaign groups with over 5,000 members, supports a regeneration-led Local Plan with sufficient housing being identified for development over the local plan period, however it strongly opposes unjustified loss of greenspace for 'unneeded' housing development. When reduced housing need and employment need are identified in the local plan an appropriate infrastructure policy should be applied to ensure adequate contributions in line with The National Planning Policy Framework (The Framework) paragraphs 11 a), 20 b), c) d), 34, 82.

<p>as precise as possible.</p>	<p>There should also be sufficient infrastructure relating to sustainable transport as set out in Section 9: Promoting Sustainable Transport; , and reliable communications as set out in Section 10: Supporting high quality communications; flood defences and other associated infrastructure in accordance with Section 14: Meeting the challenge of climate change, flooding and coastal change, and green infrastructure as set out in paragraph 175 to ensure that new development conserves and enhances the natural environment. More hedgerows should be planted in the future as well as trees and shrubs.</p> <p>The Infrastructure Development Plan should provide for Community Infrastructure Levy (CIL) requirements that arise from the quantum of new development identified in the Local Plan. We applaud inclusion of Green and Blue Infrastructure to support our natural environment as set out in specific requirements related to Green and Blue Infrastructure, open space, biodiversity and water management are also set out in Policy WS 5 and Policy WD 4. The Reader is directed to the related 'Representations' lodged by WGSA Member and Environmental expert, Hilary Ash (and Colleague) of Wirral & Cheshire Wildlife, a voluntary organisation which works closely with Wirral Council Officers on environmental studies, surveys, strategies, policies and direct action.</p> <p>On site provision should be the normal position for mitigation and to alleviate gaps in infrastructure arising from development.</p> <p>WGSA queries whether the policy provides for sufficient electric vehicle charging point from new development, and recommends it refers to the latest Council standards for EVC points per sqm so the policy remains up to date with modern practices.</p> <p>WGSA previously agreed at the most recent Local Plan Issues and Options stage that the Council's approach to require developers to undertake capacity assessments of existing social infrastructure, in order to fully identify needs arising from growth and the opportunity for potential expansion or new provision as appropriate. Brownfield sites in existing settlements are better located in terms of existing infrastructure and this supports the laudable regeneration aims and plans of the Wirral Local Plan.</p> <p>We note that Para 3.29 describes 'Infrastructure' as including water and energy supply, waste water disposal, transport systems including roads, education and healthcare as well as open space and other green infrastructure. It also states that the Local Plan is accompanied by a full 'Infrastructure Delivery Plan'. However, such a section or document has not been located for scrutiny and we are left with the thought that the Draft Local Plan should spell out in more detail its expectations of others (including developers) for the different aspects of 'Infrastructure' for typical developments of various types and scales. This is especially relevant for healthcare in the deprived areas which have significant health deficits and lack of facilities.</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</p>	<p>not applicable</p>

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.	not applicable
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Recommended modification for Policy WS1.3 Infrastructure</p> <p>I. The following key infrastructure will be delivered over the Local Plan period:</p> <ol style="list-style-type: none"> 1 Active travel networks for walking and cycling that enable safe access to jobs, leisure and health facilities throughout the Borough. 1 A new mass transit system within Birkenhead connecting new neighbourhoods with one another and existing key locations. 1 A new multi-purpose greenway (the Dock Branch Park) connecting areas within central Birkenhead between Chamberlain Street and Corporation Road (OS-SA2.7) 1 A green and blue infrastructure network providing for people and wildlife, transport and recreation, sustainable drainage and carbon sinks. 2 Additional bus infrastructure and service provision to support Liverpool City Region Bus Service Improvement Plan 2021. 3 Green and Blue Infrastructure, open space, biodiversity and water management are also required as set out in Policy WS 5 and Policy WD 4. <p>J. Development proposals will be required to demonstrate that they accord with the full range of infrastructure requirements established through the Infrastructure Delivery Plan and all other policies of the Local Plan.</p> <p>See also the last paragraph of our comments to Section 5 above requesting more detail of the 'Infrastructure Development Plan' mentioned throughout the DLP.</p>
If your representation is seeking a	Yes, I wish to participate in hearing session(s)

<p>modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>Wirral Green Space Alliance (WGSA) is a consortium of over 30 local campaign groups, representing over 5,000 members who wish the deplorable long-term disparity across the Peninsula to be at last addressed by regeneration of run-down areas of nationally-high deprivation, poor living conditions and adverse health outcomes (including a 10-year shorter life-expectancy), and Wirral's actual Housing Need delivered in this manner together with some further development within other existing urban areas. This action would have the consequential benefit WGSA also seeks in its opposition to unjustified loss of greenspace for development.</p> <p>To be sustainable development must come forward with adequate infrastructure, otherwise the Council ends up covering expense arising when issues arise.</p> <p>Our ecology is under unprecedented threat. Restoration of habitats is an important role of the Local Plan, and inclusion of adequate buffer areas to support the ecological network is important. The Climate Change Emergency and other international political issues mean that it is more important than ever to preserve our farmland for food production and to preserve our green spaces to mitigate against extreme weather events.</p> <p>The WGSA Team at LP Examination would ideally include Jackie Copley - WGSA's Planning Consultant and representative of CPRE and The Wirral Society.</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-348
Person ID	1311854
Include files	LPSD-348-EM-Copley Form 2 of 6 2107_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	1323604
Agent Name	Ms. Jackie Copley
Position	Planning Director
Company / Organisation	CPRE Cheshire
Number	Policy WS 5
Title	Strategy for Green and Blue Infrastructure, Open Space, Biodiversity, and Landscape Protection
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	Para 3.108 to 3.225
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	Wirral Green Space Alliance (WGSA), a consortium of over 30 local campaign groups with over 5,000 members, supports a regeneration-led Local Plan. WGSA agrees that our varied natural landscapes add to our quality of life, and it recognises many green and blue spaces and green infrastructure are protected under law or national policy but not all.

as precise as possible.

Our natural assets are under constant threat from climate change and ecological degradation. According to Natural England data since the 1970s, 41% of UK species have declined, mostly due to urbanisation of countryside, and whilst we welcome the introduction of the Environment Act in 2021 and are still awaiting the enabling legislation to bring forward real environmental protection. We welcome the theory of Biodiversity Net Gain and want to make sure the policies of the local plan are effective to realise the gains on the ground and not just in the form of paper-based exercises.

Therefore, the value of an adopted local plan in enabling development in the right places for the right reasons, to best protect and enhance the coast, countryside, woodland, grassland, trees, rivers and streams, urban and rural spaces for environmental reasons and also our own cultural associations and good health and well-being is understood.

Key to supporting Wirral's Open space, green and blue infrastructure biodiversity and geodiversity is ensuring the correct scale of development is identified in the housing and employment need policies (WS1.1 and WS1.2 see separate representation comments.)

Comments on individual parts of the Policy WS 5.1 Green and Blue Infrastructure Networks are set out below.

Figures 3.5, 3.6, 3.7, 3.8 do not display correctly when zoomed in on and this ought to be corrected in the next version of the electronic document. Furthermore, Figure 3.8 has SBIs and LWS marked, but there is no explanation anywhere in the Plan about the relationship between these. LWS is defined in the Glossary, SBI is not. WGSA believes this should be better explained.

WGSA is broadly supportive of Policy WS 5.1 Green and Blue Infrastructure, however we make a few recommendations to strengthen the aim of 'on-site' measures to prevent localised environmental degradation, refer to latest Defra guidance, and make clear text such as "Where on site provision is not possible" does not result in developers trying to avoid this cost. The policy or explanatory text for WS 5.1 should be clear that in Framework, paragraph 55, it is clear this that this is a mandatory contribution and replace 'financial contributions will be sought' with clear and stronger wording. The policy should complement the Landscape WD 1.1 C to emphasise using native and other wildlife-friendly species (to support biodiversity net gain) and UK&NI provenance (to lessen disease and pest importation risks).

WGSA supports Policy WS 5.2 Open Space in that all development should contribute to open space, however it could prove ineffective as there is no reference to the qualitative aspects only text that is vague 'appropriate quality' in 3.118. Can this wording be tightened?

We support 3.108 to 3.112, Fig 3.5, 3.118 and 3.121. Policy WS5.2 should say that open space must be of high quality, with naturalised space, or refer to Policy WS 5.1 about quality. This is as natural areas give greater benefits to physical and mental health especially in children (as said in 3.116). Such areas can also help with provision of Biodiversity Net Gain and Ecological Networks.

Policy WS 5.3 Outdoor Sports Provision should refer to a preference for facilities having grassed areas rather than or artificial turf or hard surfacing due to reduced value to biodiversity.

We support 3.122-3.129 and Policy WS5.4 Ecological Networks, but in assessing Biodiversity Net Gain, effects of a development on adjacent land must be considered where that land has value for biodiversity. Appropriate buffer zones may be needed (see Policy WD 3).

Whilst paragraph 3.125 states that "this Local Plan also prepares for the requirements of the Environment Act 2021 regarding Biodiversity Net Gain to be introduced", neither that paragraph nor Policy WS 5 satisfactorily address the growing incidence of landowners and developers stripping sites in order to lower the base line of Biodiversity ahead of any required 'net gain'. This practice is exacerbated by the full prohibitions and penalties within the new Act not coming into force until late 2023. Also, although paragraph 3.142 makes mention of "in the rare case of a site being subject to recent damage or detrimental change then the most recent survey undertaken before the change, or an appropriate habitat from a typology will be applied as the base line from which net gain is calculated", it incorrectly suggests that such occurrences are "rare" when they are not; and does not make it clear if this is to apply independently from the provisions of the new Act coming into force. Neither does it refer to any Council Policy. We request that the wording of Para 3.142 should also be modified so the provision is not dependent on an actual "recent survey" but include other forms of evidence including 'historical images' in Google Earth, photographic evidence, local resident statements, etc.

In the face of this type of deliberate destruction, some other LAs have brought in or are in the process of bringing in immediate interim Local Policies to address this awful practice head-on. ITPAS and WGSA have requested through Councillors and Senior Officers that this be done for Wirral as soon as possible and publicised widely. However, this has not been put in train as yet. We would request that such provisions are put into this Local Plan but also into Local Policies as soon as possible so that 'Net Gains' would then apply to the Biodiversity Base Level existing before any action is taken on site.

WGSA supports policy WS 5.4 and recommends some changes to make the policy more effective in light of the climate and ecological emergencies. The policy must effectively improve as well as protect biodiversity to make up for recent degradation and in acknowledging Wirral is an important ecological area. Any land functionally linked to estuary European sites should be referred to here and in 3.122, but as far as it is understood there is no mapping to indicate these areas, and it would be helpful to include one.

Please see the representation of Wirral Wildlife concerning the inclusion of mapping from Natural England. WGSA echoes the issues referred to in its representation and supports the proposed Local Wildlife Site (LWS) at Hoylake Langfields here, also its inclusion in the functionally linked land and the Nature Improvement Area 4, and retention of the Green Belt.

WGSA also supports the progression of the Nature Recovery Strategy and proposals for the Wetlands scheme. There are concerns over the text of final sentence of M (about sites recently damaged, an ongoing problem, see Wirral Wildlife evidence). The lack of a definition is of concern as it may lead to the policy being ineffective, when developers dispute what is 'recent'. WGSA echoes the recommendation that 'recent' is defined as in the Environment Act 2021 (Schedule 14 section 6), which defines it as after January 30th 2020. Also needs to define 'appropriate habitat typology' as the assessment will be as in the DEFRA Biodiversity Metric 3 (and subsequent updates to that methodology). See DEFRA Biodiversity Metric 3.0 User Guide p24, Step 3e and p27e about recently cleared sites. Plan must commit to assessing such recently cleared sites according to their pre-clearance state. See recommended change.

WGSA supports Policy WS 5.5 Mitigating Recreational Disturbance on International Sites for Nature Conservation, and also Policy WS 5.6 Protecting Geodiversity.

Policy WS 5.7 Maintenance of GI and OS may prove ineffective as the clauses are not consistent. Policy R says management and maintenance 'for the lifetime of the development', para 3.142 says 'for a 30-year period'. We propose 'for the lifetime of the development or a 30-year period, whichever is longer'. 'For the lifetime of the development' does carry a risk if the development fails e.g., the office development at Riverbank Road, Bromborough RES-SA4.3, now seeking to be changed to housing. 30 years is not long for a biodiversity asset e.g., a woodland planting would still be semi-mature. The maintenance should continue for as long as the development does because the biodiversity effects of the development will persist throughout its life.

WGSA supports this Policy WS 5.8 Landscape Character as it is important the landscape features and visual appearance of the Areas of Special Landscape Value are protected. WGSA supports development that is inappropriate not being permitted.

WGSA agrees that Policy WS 5.9 Evidence of approach will help support the aims and objectives of the Local Plan Policy WS 5 Green and blue infrastructure open space, biodiversity and geodiversity.

Wirral Green Space Alliance (WGSA), a consortium of over 30 local campaign groups with over 5,000 members, supports a regeneration-led Local Plan.

WGSA agrees that our varied natural landscapes add to our quality of life, and it recognises many green and blue spaces and green infrastructure are protected under law or national policy but not all.

Our natural assets are under constant threat from climate change and ecological degradation. According to Natural England data since the 1970s, 41% of UK species have declined, mostly due to urbanisation of countryside, and whilst we welcome the introduction of the Environment Act in 2021 and are still awaiting the enabling legislation to bring forward real environmental protection. We welcome the theory of Biodiversity Net Gain and want to make sure the policies of the local plan are effective to realise the gains on the ground and not just in the form of paper-based exercises.

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WGSA also supports the progression of the Nature Recovery Strategy and proposals for the Wetlands scheme. There are concerns over the text of final sentence of M (about sites recently damaged, an ongoing problem, see Wirral Wildlife evidence). The lack of a definition is of concern as it may lead to the policy being ineffective, when developers dispute what is 'recent'. WGSA echoes the recommendation that 'recent' is defined as in the Environment Act 2021 (Schedule 14 section 6), which defines it as after January 30th 2020. Also needs to define 'appropriate habitat typology' as the assessment will be as in the DEFRA Biodiversity Metric 3 (and subsequent updates to that methodology). See DEFRA Biodiversity Metric 3.0 User Guide p24, Step 3e and p27e about recently cleared sites. Plan must commit to assessing such recently cleared sites according to their pre-clearance state. See recommended change.

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WGSA agrees that our varied natural landscapes add to our quality of life, and it recognises many green and blue spaces and green infrastructure are protected under law or national policy but not all.

Our natural assets are under constant threat from climate change and ecological degradation. According to Natural England data since the 1970s, 41% of UK species have declined, mostly due to urbanisation of countryside, and whilst we welcome the introduction of the Environment Act in 2021 and are still awaiting the enabling legislation to bring forward real environmental protection. We welcome the theory of Biodiversity Net Gain and want to make sure the policies of the local plan are effective to realise the gains on the ground and not just in the form of paper-based exercises.

Therefore, the value of an adopted local plan in enabling development in the right places for the right reasons, to best protect and enhance the coast, countryside, woodland, grassland, trees, rivers and streams, urban and rural spaces for environmental reasons and also our own cultural associations and good health and well-being is understood.

Key to supporting Wirral's Open space, green and blue infrastructure biodiversity and geodiversity is ensuring the correct scale of development is identified in the housing and employment need policies (WS1.1 and WS1.2 see separate representation comments.)

Comments on individual parts of the Policy WS 5.1 Green and Blue Infrastructure Networks are set out below.

Figures 3.5, 3.6, 3.7, 3.8 do not display correctly when zoomed in on and this ought to be corrected in the next version of the electronic document. Furthermore, Figure 3.8 has SBIs and LWS marked, but there is no explanation anywhere in the Plan about the relationship between these. LWS is defined in the Glossary, SBI is not. WGSA believes this should be better explained.

WGSA is broadly supportive of Policy WS 5.1 Green and Blue Infrastructure, however we make a few recommendations to strengthen the aim of 'on-site' measures to prevent localised environmental degradation, refer to latest Defra guidance, and make clear text such as "Where on site provision is not possible" does not result in developers trying to avoid this cost. The policy or explanatory text for WS 5.1 should be clear that in Framework, paragraph 55, it is clear this that this is a mandatory contribution and replace 'financial contributions will be sought' with clear and stronger wording. The policy should complement the Landscape WD 1.1 C to emphasise using native and other wildlife-friendly species (to support biodiversity net gain) and UK&NI provenance (to lessen disease and pest importation risks).

WGSA supports Policy WS 5.2 Open Space in that all development should contribute to open space, however it could prove ineffective as there is no reference to the qualitative aspects only text that is vague 'appropriate quality' in 3.118. Can this wording be tightened?

We support 3.108 to 3.112, Fig 3.5, 3.118 and 3.121. Policy WS5.2 should say that open space must be of high quality, with naturalised space, or refer to Policy WS 5.1 about quality. This is as natural areas give greater benefits to physical and mental health especially in children (as said in 3.116). Such areas can also help with provision of Biodiversity Net Gain and Ecological Networks.

Policy WS 5.3 Outdoor Sports Provision should refer to a preference for facilities having grassed areas rather than or artificial turf or hard surfacing due to reduced value to biodiversity.

We support 3.122-3.129 and Policy WS5.4 Ecological Networks, but in assessing Biodiversity Net Gain, effects of a development on adjacent land must be considered where that land has value for biodiversity. Appropriate buffer zones may be needed (see Policy WD 3).

Whilst paragraph 3.125 states that “this Local Plan also prepares for the requirements of the Environment Act 2021 regarding Biodiversity Net Gain to be introduced”, neither that paragraph nor Policy WS 5 satisfactorily address the growing incidence of landowners and developers stripping sites in order to lower the base line of Biodiversity ahead of any required ‘net gain’. This practice is exacerbated by the full prohibitions and penalties within the new Act not coming into force until late 2023. Also, although paragraph 3.142 makes mention of “in the rare case of a site being subject to recent damage or detrimental change then the most recent survey undertaken before the change, or an appropriate habitat from a typology will be applied as the base line from which net gain is calculated”, it incorrectly suggests that such occurrences are “rare” when they are not; and does not make it clear if this is to apply independently from the provisions of the new Act coming into force. Neither does it refer to any Council Policy. We request that the wording of Para 3.142 should also be modified so the provision is not dependent on an actual “recent survey” but include other forms of evidence including ‘historical images’ in Google Earth, photographic evidence, local resident statements, etc.

In the face of this type of deliberate destruction, some other LAs have brought in or are in the process of bringing in immediate interim Local Policies to address this awful practice head-on. ITPAS and WGSa have requested through Councillors and Senior Officers that this be done for Wirral as soon as possible and publicised widely. However, this has not been put in train as yet. We would request that such provisions are put into this Local Plan but also into Local Policies as soon as possible so that ‘Net Gains’ would then apply to the Biodiversity Base Level existing before any action is taken on site.

WGSa supports policy WS 5.4 and recommends some changes to make the policy more effective in light of the climate and ecological emergencies. The policy must effectively improve as well as protect biodiversity to make up for recent degradation and in acknowledging Wirral is an important ecological area. Any land functionally linked to estuary European sites should be referred to here and in 3.122, but as far as it is understood there is no mapping to indicate these areas, and it would be helpful to include one.

Please see the representation of Wirral Wildlife concerning the inclusion of mapping from Natural England. WGSa echoes the issues referred to in its representation and supports the proposed Local Wildlife Site (LWS) at Hoylake Langfields here, also its inclusion in the functionally linked land and the Nature Improvement Area 4, and retention of the Green Belt.

WGSa also supports the progression of the Nature Recovery Strategy and proposals for the Wetlands scheme. There are concerns over the text of final sentence of M (about sites recently damaged, an ongoing problem, see Wirral Wildlife evidence). The lack of a definition is of concern as it may lead to the policy being ineffective, when developers dispute what is ‘recent’. WGSa echoes the recommendation that ‘recent’ is defined as in the Environment Act 2021 (Schedule 14 section 6), which defines it as after January 30th 2020. Also needs to define ‘appropriate habitat typology’ as the assessment will be as in the DEFRA Biodiversity Metric 3 (and subsequent updates to that methodology). See DEFRA Biodiversity Metric 3.0 User Guide p24, Step 3e and p27e about recently cleared sites. Plan must commit to assessing such recently cleared sites according to their pre-clearance state. See recommended change.

WGSa supports Policy WS 5.5 Mitigating Recreational Disturbance on International Sites for Nature Conservation, and also Policy WS 5.6 Protecting Geodiversity.

Policy WS 5.7 Maintenance of GI and OS may prove ineffective as the clauses are not consistent. Policy R says management and maintenance ‘for the lifetime of the development’, para 3.142 says ‘for a 30-year period’. We propose ‘for the lifetime of the development or a 30-year period, whichever is longer’. ‘For the lifetime of the development’ does carry a risk if the development fails e.g., the office development at Riverbank Road, Bromborough RES-SA4.3, now seeking to be changed to housing. 30 years is not long for a biodiversity asset e.g., a woodland planting would still be semi-mature. The maintenance should continue for as long as the development does because the biodiversity effects of the development will persist throughout its life.

WGSa supports this Policy WS 5.8 Landscape Character as it is important the landscape features and visual appearance of the Areas of Special Landscape Value are protected. WGSa supports development that is inappropriate not being permitted.

WGSa agrees that Policy WS 5.9 Evidence of approach will help support the aims and objectives of the Local Plan Policy WS 5 Green and blue infrastructure open space, biodiversity and geodiversity.

We support 3.122-3.129 and Policy WS5.4 Ecological Networks, but in assessing Biodiversity Net Gain, effects of a development on adjacent land must be considered where that land has value for biodiversity. Appropriate buffer zones may be needed (see Policy WD 3).

Whilst paragraph 3.125 states that “this Local Plan also prepares for the requirements of the Environment Act 2021 regarding Biodiversity Net Gain to be introduced”, neither that paragraph nor Policy WS 5 satisfactorily address the growing incidence of landowners and developers stripping sites in order to lower the base line of Biodiversity ahead of any required ‘net gain’. This practice is exacerbated by the full prohibitions and penalties within the new Act not coming into force until late 2023. Also, although paragraph 3.142 makes mention of “in the rare case of a site being subject to recent damage or detrimental change then the most recent survey undertaken before the change, or an appropriate habitat from a typology will be applied as the base line from which net gain is calculated”, it incorrectly suggests that such occurrences are “rare” when they are not; and does not make it clear if this is to apply independently from the provisions of the new Act coming into force. Neither does it refer to any Council Policy. We request that the wording of Para 3.142 should also be modified so the provision is not dependent on an actual “recent survey” but include other forms of evidence including ‘historical images’ in Google Earth, photographic evidence, local resident statements, etc.

	<p>In the face of this type of deliberate destruction, some other LAs have brought in or are in the process of bringing in immediate interim Local Policies to address this awful practice head-on. ITPAS and WGSAs have requested through Councillors and Senior Officers that this be done for Wirral as soon as possible and publicised widely. However, this has not been put in train as yet. We would request that such provisions are put into this Local Plan but also into Local Policies as soon as possible so that 'Net Gains' would then apply to the Biodiversity Base Level existing before any action is taken on site.</p> <p>WGSAs support policy WS 5.4 and recommends some changes to make the policy more effective in light of the climate and ecological emergencies. The policy must effectively improve as well as protect biodiversity to make up for recent degradation and in acknowledging Wirral is an important ecological area. Any land functionally linked to estuary European sites should be referred to here and in 3.122, but as far as it is understood there is no mapping to indicate these areas, and it would be helpful to include one.</p> <p>Please see the representation of Wirral Wildlife concerning the inclusion of mapping from Natural England. WGSAs echo the issues referred to in its representation and support the proposed Local Wildlife Site (LWS) at Hoylake Langfields here, also its inclusion in the functionally linked land and the Nature Improvement Area 4, and retention of the Green Belt.</p> <p>WGSAs also support the progression of the Nature Recovery Strategy and proposals for the Wetlands scheme. There are concerns over the text of final sentence of M (about sites recently damaged, an ongoing problem, see Wirral Wildlife evidence). The lack of a definition is of concern as it may lead to the policy being ineffective, when developers dispute what is 'recent'. WGSAs echo the recommendation that 'recent' is defined as in the Environment Act 2021 (Schedule 14 section 6), which defines it as after January 30th 2020. Also needs to define 'appropriate habitat typology' as the assessment will be as in the DEFRA Biodiversity Metric 3 (and subsequent updates to that methodology). See DEFRA Biodiversity Metric 3.0 User Guide p24, Step 3e and p27e about recently cleared sites. Plan must commit to assessing such recently cleared sites according to their pre-clearance state. See recommended change.</p> <p>WGSAs support Policy WS 5.5 Mitigating Recreational Disturbance on International Sites for Nature Conservation, and also Policy WS 5.6 Protecting Geodiversity.</p> <p>Policy WS 5.7 Maintenance of GI and OS may prove ineffective as the clauses are not consistent. Policy R says management and maintenance 'for the lifetime of the development', para 3.142 says 'for a 30-year period'. We propose 'for the lifetime of the development or a 30-year period, whichever is longer'. 'For the lifetime of the development' does carry a risk if the development fails e.g., the office development at Riverbank Road, Bromborough RES-SA4.3, now seeking to be changed to housing. 30 years is not long for a biodiversity asset e.g., a woodland planting would still be semi-mature. The maintenance should continue for as long as the development does because the biodiversity effects of the development will persist throughout its life.</p> <p>WGSAs support this Policy WS 5.8 Landscape Character as it is important the landscape features and visual appearance of the Areas of Special Landscape Value are protected. WGSAs support development that is inappropriate not being permitted.</p> <p>WGSAs agree that Policy WS 5.9 Evidence of approach will help support the aims and objectives of the Local Plan Policy WS 5 Green and blue infrastructure open space, biodiversity and geodiversity.</p>
complies 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,	not applicable

<p>soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	<p>not applicable</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 Habitats Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy</p>	<p>Figures 3.5, 3.6, 3.7, 3.8 do not display correctly when zoomed in on and this ought to be corrected in the next version of the electronic document.</p> <p>Furthermore, Figure 3.8 has SBIs and LWS marked, but there is no explanation anywhere in the Plan about the relationship between these. LWS is defined in the Glossary, SBI is not. WGSA believes this should be better explained.</p> <p>Recommended modification: Policy WS 5 Green and Blue Infrastructure Networks</p> <p><u>Policy WS 5.1 Green and Blue Infrastructure</u></p> <p>A.1. should seek compensatory measures, mitigation or replacement with a strong on-site preference to keep loss to local areas to a minimum.</p> <p>A.2 ought to refer to latest Defra guidance, which may change over time.</p> <ol style="list-style-type: none"> 1 Is supported but having the text "Where on site provision is not possible" might result in developers trying to avoid this cost. The policy or explanatory text for WS 5.1 should be clear that in the Framework, paragraph 55, it is clear this that this is a mandatory contribution and replace 'financial contributions will be sought' with clear and stronger wording. 2 please amend the last sentence in line with Landscape WD 1.1 C to emphasise using native and other wildlife-friendly species (to support biodiversity net gain) and UK&NI provenance (to lessen disease and pest importation risks). <p><u>Policy WS 5.2 - Open Space Provision</u></p> <ol style="list-style-type: none"> 1 Make clear there is an on site preference for contributions to support local access to it. <p>D.1. can the provision be increased to maximise benefits arising from development in terms of open space?</p> <ol style="list-style-type: none"> 1 It should be made clear that on-site provision is a preference, and that a financial sum is a necessary requirement to enable the grant of permission. Failure to support Open Space provision should be met with refusal. <p><u>Policy WS 5.3 Outdoor Sports Provision</u></p> <p>The policy should refer to a preference for facilities having grassed areas rather than or artificial turf or hard surfacing due to reduced value to biodiversity.</p> <p><u>Policy WS 5.4 - Ecological Networks</u></p> <p>The text needs to refer to the development effects on land adjacent to the site in assessing Biodiversity Net Gain. An appropriate buffer zone should be required to support the biodiversity of neighbouring sites and to connect to the local green network (see Policy WD 3). The final sentence of M needs to be edited and include a definition of what is 'recent'.</p>

or text. Please be as precise as possible.	
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	Yes, I wish to participate in hearing session(s)
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>Our ecology is under unprecedented threat. Restoration of habitats is an important role of the Local Plan, and inclusion of adequate buffer areas to support the ecological network is important. The Climate Change Emergency and other international political issues mean that it is more important than ever to preserve our farmland for food production and to preserve our green spaces to mitigate against extreme weather events.</p> <p>WGSA comments are made in a constructive and supportive way to ensure the Borough's wealth of natural assets are valued, and genuinely protected and enhanced in the future, and it is the motive behind our group's engagement in the local plan process.</p> <p>The WGSA Team at LP Examination would ideally include Hilary Ash – Wirral Wildlife, and/or Jackie Copley - WGSA's Planning Consultant and representative of CPRE and The Wirral Society.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	Yes

Comment ID	LPSD-349
Person ID	1311854
Include files	LPSD-349-EM-Copley Form 3 of 6 2107_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	1323604
Agent Name	Ms. Jackie Copley
Position	Planning Director
Company / Organisation	CPRE Cheshire
Number	Policy WS 1.2
Title	Employment
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat Regulations Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	Para 3.22 to 3.28
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	<p>Wirral Green Space Alliance (WGSA), a consortium of over 30 local campaign groups with over 5,000 members, supports a regeneration-led Local Plan with sufficient housing being identified for development over the local plan period, however it strongly opposes unjustified loss of greenspace for 'unneeded' housing development.</p> <p>We are supportive of the Government's levelling up agenda, however it must be grounded in a regenerative approach using the area's brownfield sites to deliver new jobs and at a realistic level. There is a concern that if the amount of employment land planned is too high then the result in the future is our green fields would be 'needlessly' threatened in the future.</p>

as precise as possible.

In its response the Council in April 2021 to the Issues and Options Local Plan, Wirral Land Availability consultation in July 2019, and again the Local Plan Development Options October 2018 WGSA responded in each case, raising concerns with the employment land evidence base and the data, analysis and assumptions applied when calculating the scale of development identified leading to unnecessary inflation.

The evidence base is a collection of developer aspirations and land owner desires, rather than a true analysis of what the reasonable estimation of what economic sectors need to be strategically planned for up until 2037. This is mainly because the Liverpool City Region Strategic Housing and Employment Land Market Assessment (SHELMA) relies on data, analysis and assumptions that are flawed, focused narrowly on past take up during a strong economic cycle, and that was unreasonable to assume would be repeated in the future, due to continuing economic uncertainties. The SHELMA also has sought to identify an accelerated 'unjust' very high growth based on the speculative development of Liverpool Port 2. The SHELMA report provides analysis of issues related to:

- Review and identify the Housing Market Area and Functional Economic Market Area geographies;
- Identify the Objectively Assessed Need (OAN) for housing over the period 2012 - 2037 across the City Region and set out an approach to distribute the City Region OAN to each of the local authorities;
- Consider the scale and distribution of economic growth across the City Region, taking account of past trends and baseline forecasts; as well as committed investment projects which may influence the scale/ distribution of growth – including Superport, Atlantic Gateway, and improved rail connectivity;
- Model the need for employment land across the City Region, taking account of the economic data and commercial market dynamics and the expansion of the Port of Liverpool; providing outputs on employment land needs at a local authority level where relevant based on demand-side considerations.

When looking at SHELMA Table 56: Full-Time Equivalent (FTE) Jobs Growth, FEMA – 2012-37, the baseline scenario shows 6,600 FTE jobs and the growth scenario shows 11,500 FTE jobs, equivalent to 174% higher growth in jobs. Of note the Wirral area is shown to have the highest number of jobs in the Liverpool Functional Economic Market Area with 112,000 jobs, equivalent to 16%. The baseline jobs growth is therefore a 5.8% growth in jobs, but the increase in jobs for the growth scenario would be 10.2%, which is very high growth.

This translates, as shown in Table 60, to 41.0 hectares being required. A five-year margin is applied inflating the figure to 64 hectares. The SHELMA then considers past completion trends, which for Wirral the total amount was 129.6 hectares. The SHELMA then moves on to consider Large Scale Warehousing defined as an individual unit over 9,000 square metres or approximately 100,000 square feet, this being the standard recognised definition within the commercial property sector. Ten large-scale units were identified out of a total of 84 across the Liverpool City Region.

The SHELMA considers Housing and Economic Growth together. Therefore, the baseline scenario in Table 73 shows 536 dwelling per annum (dpa) and the growth figure is 737 dpa. An affordability lift of 10% is also applied. A conclusion of the SHELMA is that in Wirral the demographic-based housing need figure is higher than the economic baseline and therefore the former should be relied upon. The higher number with 10% added leads to a total of 730 dpa OAN. In WGSA not enough realism about the age structure of the population is given and the fact remains that the population is aging with people retired from work. Given the demographic trend and the fact all neighbouring authorities are planning for growth, Wirral is not increasing its working age population.

For the reasons set out in WGSA evidence Policy WS 1.1 Housing Need, (supported by the analysis of Professor David Gregg for Housing Need, and that of Graham Stevens), namely the ONS 2014 based population data is based on very high growth, which is widely criticised as it is out of date, and it would lead to an unscientific approach against Government's own best practice. The ONS 2014 data should therefore not be relied upon.

At every stage the SHELMA adds additional housing and jobs leading to an unfeasibly high jobs and housing growth. The Wirral employment evidence base is too largely based on the SHELMA for the public to be confident that the high employment land figures identified in policy WS1.1 are robust.

The Lichfields Wirral Employment Land and Premises Study Final Report for Wirral Council dated

December 2017 has over sixty references to the SHELMA and the Avison Young Employment Land Options Study Draft Final, December 2019 also relies too heavily on the SHELMA study with forty references to it.

WGSA is of the opinion that this level of growth is incredibly unlikely, in fact unfeasible and not heralded by latest Data and best practice between 2012 and 2037 given Brexit, the Covid 19 pandemic, ongoing economic issues linked to the illegal invasion of Ukraine and domestic political instability. Caution should be applied to the Employment Land needs and a precautionary approach taken.

There is little risk in taking such a precautionary approach and reducing the amount of Employment Land set aside. This would also lessen the impression of a lack of vitality given by vast tracts of unmanaged 'wasteland' and allow more sites to have flexibility of Use, including for housing where appropriate and demand actually comes forward. Furthermore, the Council ought to complete a Local Plan Review within 5 years and may be required to do one before that, which means that the early years' actual economic activity and any growth can be taken into account from, say, just three years after LP Adoption, and any necessary adjustments made. This would lessen if not remove the consequential risk to Green Belt from inflated, aspirational conjecture and preserve the mandated 'permanence' until a real economic boom affecting Wirral comes along.

An up-to-date alternative data set for the examination to consider is the CENSUS data 2021 data ought to be relied upon for household growth and housing need, and so too should the employment need figures. If a key data set used to model the employment need is significantly flawed showing very high population data, then so to will the number of jobs forecast be that relies upon it.

	<p>Graham Stevens has also prepared an 18 page Report titled: Wirral Employment and Economy, 11 July 2022, which include comprehensive analysis of the Economy (Population, Employment and Economic Growth) and the Statistics with reference to Sources and Methods.</p> <p>Summary Points</p> <ul style="list-style-type: none"> • Employment trends since 2000 and the economic headwinds that the OBR Outlooks paints around its forecasts of GDP do not support the high employment growth scenarios of the previous SHMA 2016, and “consequent need for people to accommodate” such scenarios. • Wirral is a dormitory for a wider economic area (Liverpool, Cheshire) and its working age population has declined and will continue to decline. Given that Wirral's employment is based in the wider area, the decline in working age population, and Wirral's relatively low economic and employment performance; any assumptions for modelling jobs forecasts should be modest, and their impact be either downward or level at the most. • The longer- term outlook on GDP growth is weakly positive, subject to adverse economic environment (eg; energy costs, a tight labour market), and not at the level as in previous economically better times – the Office of Budget Responsibility (OBR). The forecast changes in GDP are lower than the long run trend for the UK economy and are unlikely to generate a steady rise in employment in Wirral. Assumptions in modelling Wirral jobs forecasts should reflect the recent (and impending) adverse conditions. They are material to Wirral's local plan because they represent a recent deterioration in the economic climate that affects jobs and the plan's aspiration for jobs- and Wirral's jobs level appears not to be as buoyant under changing conditions as other neighbouring authorities, e.g., Liverpool. • Certainty about continued rises in employment, even if modest, need high economic growth coupled with a major inward shift in economic activity sustained over five, ten or more years. The inputs from the original Wirral Growth Plan and newer Wirral Economic Strategy are mainly aspirational targets, ways of working with residents and business, and an analysis of Wirral's strengths and weaknesses. Such content is not the same as a set of planned and specific developments by new or existing businesses, or movement of businesses to Wirral. The developments at the Wirral Waters Enterprise Zone and Docklands are planned to 2037 and beyond. The main output is a needed regeneration, thousands more dwellings, some space for offices and warehousing, and development of the port facilities. The level of jobs growth is uncertain or unknown with businesses expected to respond and work with the plans.
<p>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 an inflated employment requirement is adopted in the Wirral Local Plan, more land, including that which has not previously been identified for development, will need to come forward. This land will not benefit from consideration by the Sustainability Appraisal.</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>As above, if an inflated employment requirement is adopted in the Local Plan, there are implications for the Habitats Regulation Assessment, in that land never considered for development will be sought for commercial consent by developers on a speculative basis.</p>
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Recommended modification for Policy WS1.2 Employment Need (although the WGSA call for a 'Main Modification' regarding issues and consequences around the highly inflated Employment figure requires more than a simple edit of the DLP text)</p> <p>The land requirements for office, other business space and warehousing should be reduced appropriately to ensure a more realistic supply of employment land for Wirral up to the year 2037.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to</p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>Wirral Green Space Alliance (WGSA) is a consortium of over 30 local campaign groups, representing over 5,000 members who wish the deplorable long-term disparity across the Peninsula to be at last addressed by regeneration of run-down areas of nationally-high deprivation, poor living conditions and adverse health outcomes (including a 10-year shorter life-expectancy), and Wirral's actual Housing Need delivered in this manner together with some further development within other existing urban areas. This action would have the consequential benefit WGSA also seeks in its opposition to unjustified loss of greenspace for development.</p> <p>What WGSA recommends is a positive employment land figure that will support regeneration and levelling up and the desirable consequence of protecting all of Wirral's green space, including Green Belt in Wirral for the benefit of all in the future.</p> <p>WGSA strongly supports the Local Plan Submission Draft to be progressed to adoption; however, it is strongly opposed to the imposition of the inflated employment land requirements, which unduly risk Wirral's green space for development in the event that speculative developments come forward on Green Belt land.</p> <p>It would like an opportunity to highlight to the Examining Inspector the WGSA case made, which seeks a 'Main Modification' to reduce the employment land need.</p> <p>WGSA supports all alternative sites, which are underused, neglected, or vacant, to be considered in advance of allocating green spaces for development. An inflated Employment Land requirement in addition to the inflated housing need figure will put unjustified pressure on previously unbuilt green space, including Green Belt.</p> <p>Our case is made to support a 'sound' local plan being adopted that will support the regeneration ambitions, and importantly conserve and enhance our greenspaces and the ecological network, which is so crucial. The Climate Change Emergency and other international political issues mean that it is more important than ever to preserve our farmland for food production and to preserve our green spaces to mitigate against extreme weather events. Land should not be allocated on the basis of largely aspirational aims with increases for various contingency upon contingency at every stage of the employment land assessment (introduced because of uncertainty, hope against experience and wished-for funding arising from higher attainment) which has been the hallmark of previous Administrations' resulting in planning problems and Wirral's long term decline and lack of ambition for regeneration at scale over many years.</p> <p>WGSA is supportive of the local plans regenerative focus as this is long overdue.</p> <p>Jackie Copley, will represent on behalf of WGSA.</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**

LPSD-350

Comment ID	LPSD-350
Person ID	1311854
Include files	LPSD-350-EM-Copley Attach 2107_Redacted.pdf LPSD-350-EM-Copley Form 4 of 6 2107_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	1323604
Agent Name	Ms. Jackie Copley
Position	Planning Director
Company / Organisation	CPRE Cheshire
Number	Policy WS 1.1
Title	Homes
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1.1

Please state which Site ID/Reference this representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective
Please give details of why you consider the Local Plan is	Wirral Green Space Alliance (WGSA), a consortium of over 30 local campaign groups with over 5,000 members, supports a regeneration-led Local Plan with sufficient housing being identified for development over the local plan period, however it strongly opposes unjustified loss of greenspace for 'unneeded' housing development. Wirral's geography is a unique peninsula with water on three sides, it is physically and environmentally constrained.

unsound. Please be as precise as possible.

Throughout the local plan stages, WGSA has repeatedly presented in-depth evidence and calculations to Wirral Metropolitan Borough Council (the Council) on the local plan housing need and the reasonable case for exceptional circumstances to use an 'alternative approach' for identifying the housing requirement as the housing need figure in the Local Plan Submission Draft is entirely flawed and risks the aims and objectives for regeneration of brownfield and protection of land in the Green Belt not being met.

In addition, the National Planning Policy Framework, 2021 (The Framework,) paragraph 38 states that "The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned." Whereas Wirral's Submission Draft Local Plan Housing Need Figure of 13,360 houses is based on out-of-date 2014 Office of National Statistics (ONS) Data, which has been widely discredited. WGSA experts have undertaken exhaustive studies and analyses using a range of different scenarios and the changing data over time. WGSA experts and other independent experts have concluded and have demonstrated that Wirral's Housing Need Figure is vastly inflated and based on obsolete figures.

A key point is that despite being presented with evidence, the Council refused to consider an alternative approach and have never produced or published its own 'Objectively Assessed Need' (OAN), and it ought to have done, due to (list not exhaustive):

- i. The Framework, successive Housing Ministers, including the Rt Hon Kit Malthouse MP, saying local planning authorities may deviate from the 'Standard Method' where there are 'exceptional circumstances';
- ii. the Standard Method employing out-of-date and discredited 2014 Data (on Population, Trends, Households, etc.) and uplifts results in a housing requirement of three to four times the amount that is actually necessary (or that derived using WMBC's own Administrative Data) and this extent of difference constitutes 'Exceptional Circumstances' and is a reason to deviate from the Standard Method employing 2014 Data;
- iii. A report by Professor Ludi Simpson of the University of Manchester (appointed for his special expertise by Liverpool University who were directly engaged by WMBC), identified the use of the Standard Method and the Office of National Statistics (ONS) 2014-based data as an 'inappropriate outlier'. (Prof Simpson developed 'Popgroup' software used by local authorities when preparing population projections. He is an eminent demographer. His Report was suppressed for a year, presumably as it supported there being 'Exceptional Circumstances' and as the Council's policy at the time – since admitted and rejected - was mass house-building in Green Belt). Prof Ludi's opinion accords with that of Professor David Gregg (an expert Member of WGSA – see below and his separate major Report);
- iv. Wirral's geography is that of a peninsula with water on three sides, it is physically constrained, and has considerable brownfield land in need of regeneration;
- v. As part of the Duty to Cooperate, Wirral should not displace population from neighbouring authorities, including Liverpool City Council, that also have ambitions for housing growth. The forerunner to the Liverpool City Region (LCR) was Merseyside County Council (MCC). It was they who reached agreement with all constituent planning authorities that the special case of the extent of deprivation and need for considerable, hugely overdue regeneration of the east of Wirral should result in tightly-drawn and maintained Green Belt boundaries on Wirral, in line with the 5th Purpose of Green Belt as set out in The Framework paragraph 138 e), to direct development to areas of real need of regeneration, addressing Deprivation and Health (etc.) Disparity across the Peninsula. The Council has failed to identify from where the 20,000 – 30,000 additional residents related to their inflated 'additional Housing Stock' will emanate, especially as they have repeatedly stated that it would not include encouraged inward migration and particularly not of retirees who would bring disproportionate calls for public services especially limited and costly health services;
- vi. Much of Wirral is protected by international, national and local environmental designations, and important habitats and the priority species that depend on them must be legally protected;
- vii. Climate emergency linked flood risk and sea level rises forecast that large areas of Wirral will be subject to flooding in the future, requiring a precautionary principle;

The Framework (NPPF 2021) Section 5: Delivering a sufficient supply of homes sets out the Government's objective of significantly boosting the supply of homes.

The Framework paragraph 61 says "To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless 'exceptional circumstances' justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local 'housing need' figure, any needs that cannot be met within neighbouring areas should also be considered in establishing the amount of housing to be planned for."

It must be remembered the Council should determine 'the minimum number of homes needed' not the 'ambitions of developers to build' or demand.

Despite the wealth of evidence for actual Housing Need presented (iteratively and updated) by various expert parties, and despite their own repeated statements that the 12,000+ (since increased) figure did not reflect actual Need, the Council has never produced or published its own 'Objectively Assessed Need' (OAN).

Government policy and emphasis are shifting and the significant disparity between the Submission Draft Local Plan 13,360 Housing Figure and the experts' detailed scenario calculations, averaging circa 4,300 houses, also provides the 'exceptional circumstances' required to depart from the previously mandated methodology (being much greater than a normal 25% divergence threshold for significance). We urge the Local Plan Inspector to consider a "Main Modification" to the Local Plan, to reduce the Housing Need Figure to reflect one which is based on realistic and up to date evidence, the wealth of Wirral's Local Administrative Data, and one which does not unnecessarily threaten Green Belt release.

The report by Prof Simpson on the alternative scenarios echoed figures and arguments of WGSA's Prof David Gregg, specifically in concluding that the real Housing Need employing best Data was within the region of 2,500 to 4,000 and NOT the 12,000+ (15-year) figure to which the Council were holding – and still are.

Please see the attached full Report titled: Lack of Due (or any) Regard to the LP Impacts of Wirral Obsolete Housing Number Targets resulting from the Discrediting of the 2014 ONS Population & Household Number Projections and withdrawal of the 2021 Standard Method, and its appendices, and the Executive Summary of Professor David Gregg.

Professor Gregg's findings are verified in the independent work of Mr Graham Stevens who has also submitted his analysis of Housing Need to the Local Plan Examination. The Council progressed with the Standard Method without referring at any time to Prof Simpson's, Prof Gregg's or Mr Steven's findings, conclusions, and recommendations.

WGSA believes that the Council did not properly consider the need for Wirral to use an alternative method and, by not deviating, it is planning for four times more houses than it should be at the risk of land protected by planning and environmental designations. This failure may well increase the likelihood of the Council returning to a situation where it fails the (artificially high) Housing Delivery Test (having achieved in the last two rounds 96% and 99% of a Delivery Figure much lower than that which would arise from the inflated Housing Need figure in the DLP), weakening the Council's resolve to resist and refuse green space/Green Belt release and development, which would result in twin Harms: harm to protected greenspace and the stalling of the much-needed Regeneration of deprived areas;

It is also considered that the Council officers may have been swayed in their opinion by the 'Planning White Paper', which as a result of widespread controversy over the lack of public engagement in local plan making and development decisions was scrapped. Michael Gove, former Secretary of the Department for Levelling Up, Housing and Communities has since published the Levelling Up Bill. WGSA wants the Government's commitment to both delivering a sufficient supply of homes and promises to protect Green Belt and other green space, meeting the challenge of climate change and conserving the natural environment, to be met. These aims are not mutually exclusive.

At the Liverpool Local Plan Examination, Nick Ireland from GL Hearn, who produced the Liverpool City Region Strategic Housing and Employment Land Market Assessment, stated that, if the research for it had been concluded after Brexit and Covid, the growth projections for economic and household growth would have been much reduced. This has not been taken into account by WMBC despite WGSA advising the Council (ahead of their submitting the DLP to the Full Council) to add an addendum qualifying the downward effect on Employment and 'Housing Number' that Brexit, Covid and the 2021 Census was most likely to have.

The ONS has published initial findings of the CENSUS 2021 data, and the full dataset should be available for the purpose of the Examination, and this is likely to support the findings of both Prof Simpson and Prof Gregg and that of the WGSA. This latest data should be used to inform the housing requirement to adhere to known best practice.

WGSA request the opportunity to update and present its Case at the Local Plan Examination in the light of further publication(s) of 2021 Census Data. Meanwhile, the attached Full Report of WGSA's Prof David Gregg (on 'Housing Need', Affordability, Migration and much more) has been updated with responses and conclusions to the publication of Wirral's initial 2021 Census Data by the ONS which reinforces the WGSA Case and the need for a 'Main Modification' to adjust downwards the 'Housing Need' starting figure and a more appropriate 'Housing Requirement'.

There is an important impact of the identified Housing Need upon maintaining supply and delivery. The Framework paragraph 74. Says "Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies³⁸, or against their local housing need where the strategic policies are more than five years old³⁹." The supply side issues are set out below.

Supply Side issues – linked to WS1.1 Part C

Below are issues that are linked to housing delivery and the inaccurate housing need calculation.

- Allowance for Net Conversions and Changes of Use – due to the Covid pandemic, changes in retail and other market uncertainties, such as Putin's illegal invasion of Ukraine, more buildings are becoming vacant and are available for reuse for residential use. The Government has loosened permitted development rights to support the reuse of empty buildings for housing and therefore the allowance for net conversions and change of use should be increased.
- Allowance for windfalls – previously, from a precursory investigation of the Council's Brownfield Register WGSA identified a missing 59.16 hectares of brownfield land relating to six sites that had not been included as 'suitable' sites on the Council's Brownfield Register. The Council should have an accurate and up to date record of suitable brownfield sites. So, in Part C of policy WS1.1 the windfall allowance should be increased.
- Empty Homes - the Submission Draft Local Plan seems to underplay the level of housing vacancy and capacity for 'Empty Homes back into Use', as it is understood there are around 150,000 dwellings on Wirral with some 5,000 classed as 'vacant', equal to a rate of 3.3%, which is over 30% higher than the national average of 2.5%. It is not clear why only 90 dwellings per annum is specified when the figure of 238 dwellings has been successfully achieved in 2016/17 and 2017/18, and well over 200 net additions each and every year over the last decade, and there are both continued Council commitment and a massive supply of suitable properties, much greater than that required to supply the full Plan Period. This Council ought to better celebrate this success and increase the allowance for 'return to use' accordingly.
- Missed opportunities – the Local Plan misses opportunities such as achieving higher density development, securing residential conversion in empty property in town centres, and misses not only vacant brownfield sites, but those still occupied but under-used likely to come forward during the plan period, which are important for revitalisation of Wirral. Further examples of missed opportunities on the Supply Side are provided in the 'Representations' of WGSA Convenor, John Heath.

If an inflated housing requirement is adopted, it will result in more land than is in reality needed being released for housing delivery and it will lead to unjustified harm to land currently protected by planning and environmental designations.

Wirral is a peninsula. The area is renowned for its special habitats and rare species. The environmental designations are a key strength of Wirral, attracting visitors all year round to enjoy nature. These are some of the "Exceptional Circumstances" as to why the "Standard Methodology for Calculating Housing Need" in conjunction with out-of-date and discredited 2014 ONS

	<p>Data is inappropriate and leads to an inflated housing requirement, at a magnitude of three to four times what it should really be. Further examples of 'Exceptional Circumstances' justification are provided in 'Representations' of WGSA Convenor, John Heath, Prof David Gregg and Hilary Ash (Wirral & Cheshire Wildlife) particularly.</p> <p>The Climate Change Emergency and other international political issues mean that it is more important than ever to preserve our farmland for food production and to preserve our green spaces to mitigate against extreme weather events. (This has now been recognised at Government level and entered Policy and Legislation). To this end, Wirral Council had passed a motion prohibiting the release of ANY 'productive' agricultural land. In addition, there is a need for widespread Soil Surveys (not yet done to any meaningful scale) to establish in advance of any development consideration (not after an application) the location of B&MV, Grade 3a and above soils/land, although we contend (like many others) that ALL Grade 3 land will be required for 'food security', wellbeing and economic reasons in the future. Further expert commentary is provided in 'Representations' of WGSA's Hilary Ash (Wirral & Cheshire Wildlife) and Colleague particularly.</p> <p>Due to the need for ongoing monitoring and review of the Local Plan once adopted, WGSA call for a 'Main Modification' as suggested below with an early review of the housing need figure to provide confidence to all stakeholders that the Local Plan will deliver enough needed homes in the most sustainable locations in the future.</p>
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	<p>If an inflated housing requirement is adopted in the Wirral Local Plan, more land, including that which has not previously been identified for development, will need to come forward. This land will not benefit from consideration by the Sustainability Appraisal and there will be no certainty that it is meeting Part A of Policy WS1.1.</p> <p>This could incur harm to the important planning and environmental designations that protect much of the land in Wirral due to its significance in terms of climate emergency goals and biodiversity net gain. It is incumbent on the local plan process to support the identification of land that is sustainable to deliver future development requirements.</p>
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the	<p>As above, if an inflated housing requirement is adopted in the Local Plan, there are implications for the Habitats Regulation Assessment, in that land never considered for development will be sought for residential consent by developers on a speculative basis. Harm may occur to land protected by the important planning and environmental designations that protect land of significance in terms of climate emergency goals and biodiversity net gain. It is incumbent on the local plan process to support the identification of land that is sustainable to deliver future development requirements, avoiding land protected under the Habitats Regulations Assessment.</p>

<p>accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Recommended modification for Policy WS1.1 Housing Need (although the WGSA call for a 'Main Modification' regarding issues and consequences around the highly inflated 'Housing Need' figure requires more than a simple edit of the DLP text):</p> <p>Based on Wirral administrative data, ONS Labour Force Survey Wirral data, the latest ONS 2020 (interim) population projections (along with latest ONS 2018 <i>variant</i> projections) and over two dozen growth scenarios in all, the <i>mean</i> 16-year housing need, after affordability uplift, in the current Standard Method is ~ 4,300 dwellings. The <i>modal</i> value is approximately 3,000 d. (The probability of a 13,360d housing need, which was based on the obsolete ONS 2014 projections and incorrect application of methodology and appropriate datasets, is close to zero). It is expected that the ONS 2021 population and household projections (based on the 2021 Census results), which the Office for Statistics Regulation has determined must be used for future planning purposes, will be lower than the estimates made above.</p> <p>Please refer to Professor David Gregg's main report and executive summary for evidence, the latter of which, deconstructs the original para 3.15. Also, please refer to the separate submission of Mr Graham Stevens, which accord with the findings albeit following an alternate method.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? * No, I do not wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>Wirral Green Space Alliance (WGSA) is a consortium of over 30 local campaign groups, representing over 5,000 members who wish the deplorable long-term disparity across the Peninsula to be at last addressed by regeneration of run-down areas of nationally-high deprivation, poor living conditions and adverse health outcomes (including a 10-year shorter life-expectancy), and Wirral's actual Housing Need delivered in this manner together with some further development within other existing urban areas. This action would have the consequential benefit WGSA also seeks in its opposition to unjustified loss of greenspace for development.</p> <p>What WGSA recommends is a positive housing need figure that will support regeneration and levelling up and the desirable consequence of protecting all of Wirral's green space, including Green Belt in Wirral for the benefit of all in the future.</p> <p>WGSA strongly supports the Local Plan Submission Draft to be progressed to adoption; however, it is strongly opposed to the imposition of the vastly inflated housing requirement, which unduly risks Wirral's green space for development in the event that the Council fails the "Housing Delivery Test" in the future, made more likely by the vastly overstated Housing Need, and where greenspace/Green Belt release and development would stall or frustrate the worthy Regeneration and 'levelling-up' agenda.</p> <p>After the 2019 Local Elections, when WGSA actions were largely responsible for both the change of local political control and the Local Plan approach (from mass housebuilding in Green Belt to a Regeneration-led one), the Council announced that it had to listen to and involve WGSA going forward. Throughout all stages since then, WGSA and WMBC have debated progress of the DLP with great success except for formal agreement on the real 'Housing Need'.</p> <p>WGSA, in its meetings with the Local Plan Team and local political leaders, had been told that the Local Plan could take on a reduced 'Housing Need' without undue delay or fundamental change. This would also give the Council the 'headroom' to better address and quicker the thousands of 'substandard' Housing Stock units by 'Replacements' on deliverable 'brownfield' sites released from being reserved for exaggerated Demand and developed to better internal and external 'greened-up' space standards.</p> <p>It would like an opportunity to highlight to the Examining Inspector the WGSA case made, which seeks a 'Main Modification' to reduce the Housing Need number, and an early review of the Housing Requirement.</p> <p>WGSA supports all alternative sites, which are underused, neglected, or vacant, to be considered in advance of allocating green spaces for development. An inflated housing need figure will put unjustified pressure on previously unbuilt green space, including Green Belt.</p> <p>Our ecology is under unprecedented threat. Restoration of habitats is an important role of the Local Plan, and inclusion of adequate buffer areas to support the ecological network is important. The Climate Change Emergency and other international political issues mean that it is more important than ever to preserve our farmland for food production and to preserve our green spaces to mitigate against extreme weather events.</p> <p>The WGSA Team at LP Examination would ideally include our Wirral & Cheshire Wildlife Rep, Hilary Ash (and/or a Colleague) who has assisted the Council for many years on a voluntary basis with its Environmental Strategies and Policies, and Jackie Copley - WGSA's Planning Consultant and representative of CPRE and The Wirral Society. It is proposed that the WGSA Team at Examination would be headed by Barrister Killian Garvey (King's Chamber) and supported by Prof David Gregg (on Housing Need, Air Quality and Heritage) and John Heath (retired Architect and WGSA Founder/Convenor).</p> <p>We support an Adopted Local Plan, with a realistic housing requirement to enable Wirral Council to better steer sustainable development, and in doing so, conserve Wirral's green spaces for the enjoyment and benefit of all in the future.</p> <p>At the time of drafting over 22,000 people had signed WGSA petitions saying no to releasing Green Belt land for development – Brownfield First! https://www.change.org/p/councillor-janette-williamson-say-no-to-releasing-wirral-s-green-belt-land-for-development-brownfield-first</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's</p>	<p>Yes</p>

recommendations
and adoption of the
Plan).

* Yes
* No