

<b>Comment ID</b>	LPSD-351
<b>Person ID</b>	1311820
<b>Include files</b>	<a href="#">LPSD-351 Oldham Attach 1 of 2 (Map)_Redacted.pdf</a> <a href="#">LPSD-351 Oldham Attach 2 of 2 (Signature)_Redacted.pdf</a>
<b>Consultee Name</b>	Mr David Oldham
<b>Position</b>	Leader
<b>Company / Organisation</b>	Friends of Pasture Marsh
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Part 5
<b>Title</b>	Settlement Area Policies
<b>To which part of the Local Plan does this representation relate?</b>	Policies Map
<ul style="list-style-type: none"> <li>* Paragraph(s)</li> <li>* Policy</li> <li>* Site</li> <li>* Policies Map</li> <li>* Sustainability Appraisal</li> <li>* Habitat Regulations Assessment</li> </ul>	
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this</b>	

<b>representation relates to.</b>	
<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	Main policies map - Policy WP5 figure 5.6
<b>Legally compliant</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	Please see answer to question 4b
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
<b>Please give details of why you consider the Local Plan is unsound. Please be</b>	Not Consistent with National Policy We believe that the plan is contrary to NPPF guidance chapters 13, 14 & 15 in particular. We believe that any development on this land would violate the following policies: 153. Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures <sup>53</sup> . Policies should support appropriate measures to ensure the future resilience of communities and

as precise as possible.

infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.

154. New development should be planned for in ways that: a) Avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure.

159. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

174. Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

179. To protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity<sup>61</sup>; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation<sup>62</sup>; and b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

For these reasons we believe that development should not be encouraged in this area by way of its designation as a residential area.

#### Flood Water Storage Area

The site has been recently identified in Wirral Council's SHLAA under designation 4022.

"Site is entirely within Flood Zone 3, it is identified for flood water storage in the UDP and contains a priority habitat (Coastal and floodplain grazing marsh) so suitability is uncertain. No developer has come forward to support residential development on this site, therefore, achievability is uncertain."

Given its designation as flood water storage and that it is almost entirely under-water for half of the year, the adjacent residents would be concerned that any permitted development on the land would endanger the existing properties in the flood zone from flooding as the field is part of the flood defence strategy for Leasowe. As the ongoing effects of climate change are being felt the residents of Leasowe are particularly vulnerable to sea level change as the majority of the area sits within Flood Zone 3 and the potential removal of flood water storage area would cause a number of residents to no longer feel safe to remain in the area.

Part of the new Local Plan states:

5.43 The priorities for Mid-Wirral are to:

1. Maintain and enhance the open aspect of the northern coastline; the national and international importance of the inter-tidal foreshores and their supporting habitats, (part of which are in unfavourable recovering condition); and public access to the facilities and open spaces associated with the North Wirral Coastal Park, through the Interim Approach to Avoid and Mitigate Recreation Pressure in Wirral<sup>173</sup> and other policies in the plan in particular WS 5 Strategy for Green and Blue Infrastructure, Open Space, Biodiversity and Landscape Protection and WD 3 Biodiversity and Geodiversity Assets.

2. Manage, mitigate and reduce flood risk across the northern part of the area and along inland river corridors, while maintaining and enhancing public access and biodiversity through Policy WS 5 and WD 4 Coastal Protection, Food Risk, Sustainable Drainage and Natural Water Management.

We believe that by designating this land as residential it is in direct opposition to the above policies.

#### Wildlife Habitat

Many locals enjoy the field for the purpose of bird watching as it is a well-known habitat for a great variety of birds and amphibians. Any development around this area would require the removal of the lake that forms the main feature of the habitat in the field. Due to its annual flooding it is considered that the field provides a unique habitat in the area which has not been considered in the council's evidence base for the proposed changes and sets the area apart from other green space. As the field is very open on two of its boundaries it is considered that its amenity value for the public is higher than usual and forms a key part of the character of the area.

Known protected species also inhabit the marsh including bats and great crested newts.

#### Not Justified due to Existing Housing Development in the Local Area

Immediately to the south of the field is a large housing development which is already under construction. 507 new homes are proposed to be built on former factory land which will significantly increase both traffic in the area and pressure on local infrastructure and services. As there is little infrastructure in Leasowe, the local residents are reliant on Moreton for local shops, schools and services. This current development will strain this infrastructure and it is considered that any further development that may be permitted in the immediate area would drastically change its character and cause damage to its already stretched services.

#### Requests

Given these arguments we would request that the marsh be afforded Nature Area status in the new local plan similar to the adjacent Ditton lane Nature Area and have its Residential Area status removed. For reference we have attached a satellite screenshot of the marsh and the local plan map 'maps.pdf'

<b>omplies with the Duty to co-operate</b> *        Yes *        No	No
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	<p>We believe the council has not complied with its Statement of Community Involvement under section 2.4 "It is important that the techniques employed are tailored to engage the most appropriate parts of the community at the stages when their involvement will be of greatest relevance and value."</p> <p>Almost none of the local residents that were signatories of the attached petition were aware of the new local plan and would therefore not have been aware of the timeframe for making representations in relation to the plan. As this period of public consultation would constitute the period of 'greatest relevance and value' we believe that the council should have advertised this plan through means such as leaflets through front doors to make people aware of the plan in particular nearby residents of large changes in policy zones such as this.</p>
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	
<b>Please set out the modification(s) you consider necessary to make the Local Plan legally</b>	<p>the marsh be afforded nature area status in the Local Plan similar to the adjacent Ditton Lane Nature Area.</p> <p>In support of these statements the attached petitions were undertaken over the months of June/ July 2022 where local residents were shown the extract of the councils new local plan and asked whether they would support the planned change to designate the marsh as residential, signatories of the form were in agreement that the field should be afforded protection against future development. We have also attached the small flyer shown to signatories of the physical petition.</p>

<p><b>compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>There are also social media pages with the below linked petition gathering further signatures which we believe demonstrates the local communities opposition to the councils proposed re-designation. At the time of writing this petition has over 1500 signatures. Below is a link to this petition and attached screenshot of the petition at the time of submission. 'Pasture Marsh Signatures.pdf'</p> <p><a href="https://www.change.org/p/preserve-the-precious-wildlife-and-habitat-at-pasture-marsh-wirral">https://www.change.org/p/preserve-the-precious-wildlife-and-habitat-at-pasture-marsh-wirral</a></p> <p>Should any further evidence be required for any of the claims in this representation we can provide more information such as video evidence of the protected species inhabiting the marsh. Unfortunately the representation system does not allow more than one file to be attached at this stage.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>No, I do not wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the hearing session(s), please outline why</b></p>	

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

<b>Comment ID</b>	LPSD-352
<b>Person ID</b>	1311854
<b>Include files</b>	<a href="#">LPSD-352-EM-Copley Form 5 of 6 2107_Redacted.pdf</a>
<b>Consultee Name</b>	Mr John Heath
<b>Position</b>	Planning Rep & Convenor and Steering Group Member
<b>Company / Organisation</b>	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
<b>Agent ID</b>	1323604
<b>Agent Name</b>	Ms. Jackie Copley
<b>Position</b>	Planning Director
<b>Company / Organisation</b>	CPRE Cheshire
<b>Number</b>	Policy WP 8
<b>Title</b>	Policy for the Rural Area
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WP 8
<b>Please state which Site ID/Reference this</b>	

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 believes that Wirral's countryside and coast adds value to Wirral and agrees it is a dominant part of the Borough's character and attractiveness, rich in heritage, biodiversity and landscape character that warrants protection and enhancement in the policies of the local plan. WGSA wishes for the area's large scale country parks, woodlands, local nature reserves, golf courses, playing fields and public rights of way, to be accessible to everyone in the future.



<p><b>as precise as possible.</b></p>	<p>The whole of the remaining undeveloped coastline is protected from development by national and international designations for nature conservation and most of the inland fields near the foreshores are used by overwintering birds at high tide. This said, much of the open inland fields also relate to the protected shores as breeding, foraging and sheltering grounds, which need to remain 'open' and development would endanger.</p> <p>Furthermore, Green Belt planning policy has successfully maintained a high degree of openness but this is subject to constant developer pressure as they aspire to profit from turning land at low agricultural value into high residential value in more affluent parts of the Borough.</p> <p>The majority of the Area remains in productive use for agriculture, and this is tremendously important for food security, especially in current globally uncertain economic times as food supplies are short of what is needed; and the Local Plan needs to recognise this and also recent Government statements and policy (including Brexit) emphasising greater homeland production for food security and benefits to carbon-miles-reduction and the UK Economy.</p> <p>There are a number of heritage assets in Wirral's rural areas that need to be conserved and enhanced by the policies in the local plan. Whilst this is mentioned, the Plan fails to cover the Framework (and other) Guidance requirement to conserve and enhance the 'settings' and surroundings of heritage assets as well as the assets themselves. Amongst other examples, ITPAS has highlighted in its 'Representations' the Scheduled Ancient Monument, Irby Hall, an important moated Site, intrinsically linked to the surrounding farmland, the historic footpath from the old Dawpool Harbour to Irby Village, the collection of red sandstone buildings (including Listed Buildings) clustered around the gateway junction to Irby Village, and 'Londymere', the Roman Well, within the next field which was a drinking water supply for the old Village, an immersion site for the Sick who could pay and source of the Greasby Brook, but which the Plan fails to mention despite being suggested for designation and protection by the Council's own Consultants.</p> <p>One key part of Wirral's history is that Sir Patrick Abercrombie, the famous professor of architecture at the University of Liverpool, established The Wirral Society due to concern about the harmful impacts of urban sprawl on the countryside. This was the forerunner of the CPRE, Countryside Charity network.</p> <p>WGSA is pleased to note in para 5.68 "It is recognised that the countryside is not an appropriate location for uses which are more suitable within an urban area". WGSA agree that "Tourism can provide for diversification in the rural economy and can be accommodated in so far as the scale, location and impact of such uses can be kept within acceptable limits". There always needs to be a balance between environmental capacity and the demand of humans.</p> <p>WGSA applaud the nine priorities for the Rural Area, and recognise the comments against the six Conservation Areas.</p>
<p><b>omplies with the Duty to co-operate</b>  * Yes  * No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability</b></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><b>Recommended modification: Policy WP 8 Policy for the Rural Area</b></p> <p><u>WP 8.1 Green Belt</u></p> <p>WSGA supports the reference to national <u>planning</u> policy to avoid duplication.</p> <p><u>WP 8.2 Agricultural Land</u></p> <p>WSGA supports the policy. It is important BMV land is safeguarded for future generations and for issues of food security. However, “safeguarded” has an unfortunate association with Green Belt being released for use in the long term and therefore WSGA suggests an alternative wording.</p> <p>D is good as it clearly will discourage applications on BMV as developers will understand that they are likely to be refused. Restoration conditions to return temporary land uses back to the same or better agricultural condition must be secured in advance of any exceptions to using agricultural land for development.</p> <p><u>WP 8.3 Public Rights of Way and Access</u></p> <p>WSGA supports the policy. Providing surfacing that can accommodate all types of users including wheelchairs and pushchairs would be welcomed.</p> <p><u>WP 8.4 Conservation Areas</u></p> <p>WSGA supports the individual policies for:</p> <ul style="list-style-type: none"> <li>• Barnston Village (CON-SA8.1).</li> <li>• Eastham Village (CON-SA8.2)</li> <li>• Frankby Village (CON-SA8.3)</li> <li>• Saughall Massie Village (CON-SA8.4)</li> <li>• Thurstaston (CON-SA8.5)</li> <li>• Thornton Hough (CON-SA8.6)</li> </ul> <p>For all its support on rural area policy, WSGA views the location and quantity of housing and jobs to be crucial to the local plan enabling rural area protection and enhancement, hence our effort to reduce the quantum of housing and jobs to ‘needed’ rather than ‘developer demanded’ (see representations for WS 1.1 Housing need and WS1.2 Employment need) and the sequential approach of focusing new development in existing areas due to the accessibility and proximity to existing infrastructure. Loss of land in rural areas is unsustainable (per capita) due to the need for additional journeys to access services and employment, school etc. Failure against the requirements leads to loss of Green Belt and BMV land.</p> <p>See comments above in Box 5.</p> <p>1 Part 5: SA Policies: Rural Area - Settlement Area 8: Paras 5.63, 5.65 and 5.69:</p> <p>Para 5.63: Reference to “inland fields” being critically linked to the protected coastline (coastal areas) should NOT be limited to “the inland fields near the foreshores” as much of the Peninsula’s central Green Belt/agricultural fields is also intrinsically linked to the protected coastline as breeding, foraging, hunting and sheltering grounds. This needs to be spelled-out as this makes much of Settlement Area 8 unavailable for development without extraordinary ‘exceptional circumstances’, of which none have been found throughout this prolonged process.</p> <p>Part 5: SA Policies: Rural Area - Settlement Area 8: Para 5.65</p> <p>Reference to Irby Hall is incomplete: it should read, “the moated site of Irby Hall” as it is one of the best, most-intact moated Hall sites in the north of England.</p> <p>Part 5: SA Policies: Rural Area - Settlement Area 8: Para 5.69</p>

	<p>After Sub-para 1, there should be another introduced: "Protect and enhance the existing 'quiet' and 'dark sky' areas, essential to the wellbeing of much wildlife (protected and vulnerable) and the special character and ambiance of such areas of countryside."</p> <p>Part 5: SA Policies: Rural Area - SA 8 and Policy WP 8.2: Para 5.69 Sub-para 4</p> <p>Sub-para 4 should be expanded to refer to the Council's Motion which was passed into Policy unanimously whereby ALL 'productive farmland' is to be protected from development, which protection is to extend beyond B&amp;MV Category 3a land. This should also apply to Policy WP 8.2, Para 'C' Sub-para 2.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></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>Since 2019, when Wirral's political Leaders announced that WGSA should be listened to and involved in the Local Plan development from then on, we have regularly been involved in Strategic Meetings and workshops and exchanged updates and reports. Involvement in hearing session(s) would seem a natural continuation.</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><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>* Yes</p>	<p>Yes</p>

*	No
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<b>Person ID</b>	1311854
<b>Include files</b>	<a href="#">LPSD-353-EM-Copley Form 6 of 6 2107_Redacted.pdf</a>
<b>Consultee Name</b>	Mr John Heath
<b>Position</b>	Planning Rep & Convenor and Steering Group Member
<b>Company / Organisation</b>	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
<b>Agent ID</b>	1323604
<b>Agent Name</b>	Ms. Jackie Copley
<b>Position</b>	Planning Director
<b>Company / Organisation</b>	CPRE Cheshire
<b>Number</b>	Policy WS 8
<b>Title</b>	Strategy for Sustainable Construction, Renewable and Low Carbon Energy
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 8
<b>Please state which Site ID/Reference this</b>	

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.	
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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	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 there is an urgent need to address the climate change emergency. Understanding that half of our national annual carbon emissions are from buildings means that the management of how development comes forward is crucial in moving toward net zero carbon.

<b>as precise as possible.</b>	<p>WGSA is broadly supportive of the focus of the local plan on the energy hierarchy, the role of passive design, retrofitting, targets of energy efficiency; avoidance of overheating; performance monitoring; post occupancy monitoring; and renewable energy. In addition, water efficiency will save energy and manage water resources properly.</p> <p>For all its support on matters of sustainability, WGSA views the location and quantity of housing and jobs to be crucial to the local plan enabling sustainable development, hence our effort to reduce the quantum of housing and jobs to 'needed' rather than 'developer demanded' (see representations for WS 1.1 Housing need and WS1.2 Employment need) and the sequential approach of focusing new development in existing areas due to the accessibility and proximity to existing infrastructure. Loss of land in rural areas is unsustainable (per capita) due to the need for additional journeys to access services and employment, school etc.</p> <p>Carbon fixation is an environmental net gain and it ought to be a consideration when considering whether to grant permission for new development. This has particular relevance to the development of greenfield sites. These alterations are proposed to strengthen the effectiveness of the Plan in tackling climate change.</p> <p>WGSA echo the comments under Policy 8 made by Wirral Wildlife concerning existing carbon function of land. Where land presently stores carbon, this needs accounting for. Development of peat is prohibited in the Framework, but the local plan should support the conservation of land use that are beneficial to carbon storage and support the conservation of mossland and other natural infrastructure such as woodland and trees. Also, new development should be encouraged to include in the design more surface areas to be naturalised, such as features such as green roofs, green walls, SuDs features, etc. There are also concerns about the use of hydrogen from natural gas in terms of its carbon footprint.</p> <p>WGSA also echo the comments by John Heath of ITPAS on limiting higher density and high-rise buildings (being encourage through an inflated 'Housing Need') and agree that an increased provision with commercial and larger residential developments of Basements would reduce land-take, increase the proportion and attraction of areas between buildings and reduce the energy required to heat/cool buildings whilst increasing their capital value, a strategy widely and successfully used abroad.</p> <p>Higher Density of Developments: Paras 3.30 et seq and et al, Policies WS 3.2, 7.1 and 9.3:</p> <p>Higher Density of Developments: This is mentioned in this section of the DLP (Para 3.30 et seq and et al) and in more detail later (Policy WS 3.2) as a necessity for complying with the NPPF aim of 'Making effective use of land' and the sufficiency of the availability of developable 'brownfield' sites, although that is not a problem on Wirral where the scale of such 'brownfield' land is of national significance.</p> <p>ITPAS and WGSA contend that in part the proposed higher densities of development (particularly of housing) are proposed to address the very significantly exaggerated 'Housing Need' and 'Housing Requirement' figures. The resulting overly-high densities proposed are unnecessary and would be detrimental to the character of Wirral's towns and villages (with the possible exception of Birkenhead and other main Regeneration areas) and to the quality of life, the space between buildings and wellbeing of residents.</p> <p>Higher densities coupled with the call for more internal space in homes (to take account of increased incidence of working and learning from home) plus more local greenspaces and open 'blue' and 'green' spaces, and increased walking, cycling and public transport routes can all only be achieved by building higher, which has not been proven to be beneficial for residents and would change the built environment and character of towns and villages. The better solution would be a more realistic (lower) level of additional homes and a lesser drive to increased densities. See also later 'Representation' on Policies WS 7.1 and WS 9.3 and the part that Basements can play in making higher density development (including housing) more acceptable.</p>
<b>omplies with the Duty to co-operate</b> *     Yes *     No	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation,</b>	not applicable

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.	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</p>	<p><b>Recommended modification: WS 8 Strategy for Sustainable Construction, Renewable and Low Carbon Energy</b></p> <p><u>WS 8.1 Energy Hierarchy</u> WGSA is supportive of this policy.</p> <p><u>WS 8.2 Sustainable Construction – Energy Efficiency, Overheating and Cooling and Water Usage</u> WGSA is supportive of this policy. For greater clarity and effectiveness, we propose that all new buildings should meet recognised climate standards, such as BREEAM excellence for commercial and public buildings, and Passivhaus or equivalent for housing.</p> <p><u>WS 8.3 Improvements to Historic Buildings</u> WGSA is supportive of this policy. However, the reason for a building being considered a heritage asset ought not to be harmed in terms of heritage significance due to any modification.</p> <p><u>WS 8.4 On site Renewable and Low Carbon Energy</u> WGSA is supportive of this policy. High value farmland assessed as Best and Most Versatile grade 1 to 3a (and preferably all Grade 3, which is under discussion) should not be developed for renewables. It is preferable for all new buildings to incorporate roof mounted equipment. However, if used on a temporary basis the agricultural site should have a restoration condition applied, so it is restored to an improved condition than before, and the site not considered brownfield in the future. Wind turbines should only be permitted in receiving environments where the rural landscape is not harmed in terms of landscape character and visual amenity.</p> <p><u>WS 8.5 Carbon Compensation through Renewable and Low Carbon Energy</u> WGSA is supportive of this policy. See comments to 8.4 above.</p> <p><u>WS 8.6 Heat and Power Networks</u> WGSA is supportive of this policy.</p> <p><u>WS 8.7 Stand-alone Renewable and Low Carbon Energy Schemes</u> WGSA is supportive of this policy. See comments to 8.4 above.</p> <p><u>WS 8.8 Climate Change and Energy Statement</u> WGSA is supportive of this policy and is pleased to see reference to the UK Climate Change Committee sixth budget.</p>



<b>suggested revised wording of any policy or text. Please be as precise as possible.</b>	
<b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b> * <b>No, I do not wish to participate in hearing session(s)</b> * <b>Yes, I wish to participate in hearing session(s)</b>	Yes, I wish to participate in hearing session(s)
<b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b>	<p>Our environment is under unprecedented threat. Decarbonisation and increase in efficiencies and reliance on renewable energy is incredibly important for future generations.</p> <p>WGSA comments are made in a constructive and supportive way to ensure the Borough's environment is genuinely protected and enhanced in the future, and it is the motive behind our group's engagement in the local plan process.</p> <p>Since 2019, when Wirral's political Leaders announced that WGSA should be listened to and involved in the Local Plan development from then on, we have regularly been involved in Strategic Meetings and workshops and exchanged updates and reports. Involvement in hearing session(s) would seem a natural continuation.</p> <p>WGSA would like to be at the table when these important policies are discussed due to the important impacts on the environment and need for locational factors to be considered to protect high grade farm land and landscapes that are sensitive to manmade intrusions.</p> <p>The WGSA Team at LP Examination would ideally include Rod Tann of The Wirral Society.</p>
<b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b> * <b>Yes</b> * <b>No</b>	Yes

<b>Comment ID</b>	LPSD-354
<b>Person ID</b>	1237567
<b>Include files</b>	<a href="#">LPSD-307,354,355,357,358,1387,1388,1389-Moffat Attachment.pdf</a>
<b>Consultee Name</b>	Mr Richard Moffat
<b>Position</b>	Director
<b>Company / Organisation</b>	Hampstead Investments
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Part 1
<b>Title</b>	Introduction and Background
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
<b>Please state which paragraph number(s) this representation relates to.</b>	Paragraph 1.1
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	

<p><b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b></p>	
<p><b>Legally compliant</b>  *        Yes  *        No</p>	<p>Yes</p>
<p><b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b></p>	
<p><b>Sound</b>  *        Yes  *        No</p>	<p>Yes</p>
<p><b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b></p>	<p>Please refer to attachment.   Hampstead support the strategic objective set out in paragraph 1.1 of the plan that The Wirral Local Plan sets out the strategy, policies and proposals for meeting the Borough's development needs in a sustainable and transformational manner from 2021 up to 2037. These range from the regeneration of areas of underused land to the protection and improvement of our historic and natural environment. It is submitted that the redevelopment of the Carlett Park Oil Depot is entirely consistent with this primary purpose.</p>
<p><b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b>  *        Not Positively Prepared  *        Not Justified  *        Not Effective  *        Not Consistent with National Policy</p>	
<p><b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b></p>	

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

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

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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<b>Comment ID</b>	LPSD-355
<b>Person ID</b>	1237567
<b>Include files</b>	<a href="#">LPSD-307,354,355,357,358,1387,1388,1389-Moffat Attachment.pdf</a>
<b>Consultee Name</b>	Mr Richard Moffat
<b>Position</b>	Director
<b>Company / Organisation</b>	Hampstead Investments
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 1.1
<b>Title</b>	Homes
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policies Map
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	Bebington SE Map 4 of 4
<b>Legally compliant</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Consistent with National Policy
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	Please refer to attachment. Hampstead object to the proposal map in that the Carlett Oil Depot site should be removed from the Green Belt and allocated for housing in recognition of the need to secure the remediation of contamination.



<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>	<p>Hampstead object to the proposal map in that the Carlett Oil Deport site should be removed from the Green Belt and allocated for housing in recognition of the need to secure the remediation of contamination.</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><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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<b>Comment ID</b>	LPSD-356
<b>Person ID</b>	1241495
<b>Include files</b>	
<b>Consultee Name</b>	Mrs Lesley Brockbank
<b>Position</b>	Wirral Coordinator
<b>Company / Organisation</b>	Wirral & Cheshire Badger Group
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WD 3
<b>Title</b>	Biodiversity and Geodiversity
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
<b>Please state which paragraph number(s) this representation relates to.</b>	3.129
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	In assessing BNG the effects of a development on adjacent land must also be taken into consideration especially where that land has value for biodiversity. Appropriate buffer zones will be essential especially for trees.

<b>omplies with the Duty to co-operate</b> *     Yes *     No	Yes
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	
<b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b>	In assessing BNG the effects of a development on adjacent land must be taken into consideration especially where that land has value for biodiversity. Appropriate buffer zones will be essential especially for trees.

<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><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>No, I do not wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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<b>Comment ID</b>	LPSD-357
<b>Person ID</b>	1237567
<b>Include files</b>	<a href="#">LPSD-307,354,355,357,358,1387,1388,1389-Moffat Attachment.pdf</a>
<b>Consultee Name</b>	Mr Richard Moffat
<b>Position</b>	Director
<b>Company / Organisation</b>	Hampstead Investments
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WP 4.2
<b>Title</b>	Residential Sites
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WP 4.2
<b>Please state which Site ID/Reference this representation relates to.</b>	

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

<b>omplies with the Duty to co-operate</b> *     Yes *     No	Yes
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	
<b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b>	Hampstead object to Policy WP4.2 in that it should specifically make reference to the Carlett Park site. ID: <i>RES-SA4.12</i> Name: <i>Carlett Park Oil Depot Ferry Road Eastham</i> Approximate Dwelling Capacity: <i>110</i> Anticipated Delivery: <i>2024/25 onwards</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>[see p.g. 8 of attachment]</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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<b>Comment ID</b>	LPSD-358
<b>Person ID</b>	1237567
<b>Include files</b>	<a href="#">LPSD-307,354,355,357,358,1387,1388,1389-Moffat Attachment.pdf</a>
<b>Consultee Name</b>	Mr Richard Moffat
<b>Position</b>	Director
<b>Company / Organisation</b>	Hampstead Investments
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WD 15.1
<b>Title</b>	Contamination and Ground Stability
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WD 15.1
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Consistent with National Policy
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	<p>Please refer to attachment.</p> <p>Hampstead is supportive of paragraph 6.86 and its recognition of the fact that: A number of potentially contaminated sites are located in the Borough, a legacy of its industrial heritage. These sites include previous chemical processes and land reclamation. Remediation enables the reuse of previously developed land, thereby making a major contribution to urban regeneration.</p> <p>Hampstead however objects to Policy WD15.1 in that it does not expressly recognise that redevelopment of a site is a valid and viable mechanism for addressing contamination legacy. Revising the policy would be consistent not only with the wording of paragraph 6.86 but also paragraph 120 of the NPPF which directs that “substantial weight” should be given to the need to remediate contaminated land. The plan as currently drafted is contrary to national policy and hence not sound (see above para 1.4).</p>

<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and</b></p>	<p>Policy WD15.1 should be revised as follows:</p> <p><i>A. Development proposals likely to affect land known or suspected to be unstable or contaminated, including by invasive species, must be supported by a contamination and ground stability assessment, as appropriate, that identifies: 1. the nature, level and extent of contamination or instability; and 2. the implications of contamination or instability for the development of the site and risk to human health, the natural environment, including water bodies and water courses, buildings and other property; and 3. a viable method of remediation which will safeguard users or occupiers of the proposed development, neighbouring land uses and the environment from significant risk, and will make the land suitable for the use proposed.</i></p>



<p><b>sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p><i>B. Planning conditions or a legal agreement will be used where appropriate, to secure a proportionate site investigation and to secure and implement a suitable remediation strategy prior to development or as part of an agreed, phased programme.</i></p> <p><i>C. Proposals within areas likely to be affected by contamination and or unstable land will only be permitted where it can be demonstrated that appropriate remedial measures and safeguards will be in place over the lifetime of the development, having regard to the impact on the amenity and character of the area.</i></p> <p><i>D Proposals which deliver the remediation of contaminated sites through redevelopment to provide viable and sustainable alternative use or development will be positively supported.</i></p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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<b>Comment ID</b>	LPSD-359
<b>Person ID</b>	1241495
<b>Include files</b>	
<b>Consultee Name</b>	Mrs Lesley Brockbank
<b>Position</b>	Wirral Coordinator
<b>Company / Organisation</b>	Wirral & Cheshire Badger Group
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 5.1
<b>Title</b>	Green and Blue Infrastructure Networks
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 5.1
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> *     Yes *     No	Yes
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *     Yes *     No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> *     Not Positively Prepared *     Not Justified *     Not Effective *     Not Consistent with National Policy	Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	B – “financial contributions will be sought”. C - “At all times appropriate plant and tree species should be selected which includes native species and those of local provenance.”

<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	Yes
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>	<p>B - should read <i>"financial contributions will be <b>required</b>"</i></p> <p>C - should read <i>"native and other wildlife friendly species should be selected to support BNG and to be of UK provenance (to reduce risks of disease &amp; pests)."</i></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><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>No, I do not wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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<b>Comment ID</b>	LPSD-361
<b>Person ID</b>	1323311
<b>Include files</b>	<a href="#">LPSD-361-EM-Brunsdon Form 2207_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Tim Brunsdon
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy RA 10
<b>Title</b>	New Brighton Regeneration Area
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	RA10
<b>Please state which Site ID/Reference this representation relates to.</b>	



<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	<p>I think points C1 &amp; C2 in the masterplan for the Marine Promenade (MPA-RA10.1) do not provide enough vision or detail for this key tourist and cultural destination. This area is unique with a lot of heritage and although the plans mention 'strategic seaside location' I do not think that the statement 'a mix of cultural, hotel, leisure and residential uses' is a clear enough vision.</p> <p>This area is prime for developers to make a lot of money from high price sea view apartments with standard shop units underneath, filled with Tesco Local or Costa Coffee. Basically a clone town regeneration plan, great for developers but poor for the area long term. What is there in these plans to stop this happening? New Brighton deserves better.</p>

	<p>So much has been lost in the area due to a number of economic factors and short term planning objectives. The Marine Promenade has the potential to be so much more and here is an opportunity to deliver it. There are lots of alternative models to look at for inspiration. A good example to look at would be what is happening over in Bootle canal side <a href="https://mysefton.co.uk/2021/08/05/transformation-and-regeneration-get-the-green-light-in-bootle/">https://mysefton.co.uk/2021/08/05/transformation-and-regeneration-get-the-green-light-in-bootle/</a> A space to test out new ideas about what people would like to see in the area.</p> <p>This is such a key location, right on the entrance to the river mersey and Liverpool – it deserves a more ambitious vision that supports the local economy, producing something unique based on it's position on the coast and it's local heritage.</p>
<b>omplies with the Duty to co-operate</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	

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

<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	<p>I live in the area highlighted as the New Brighton Re-Generation area so consider myself to be directly impacted by these plans.</p>
<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      Yes</p> <p>*      No</p>	<p>Yes</p>

<b>Comment ID</b>	LPSD-362
<b>Person ID</b>	1323620
<b>Include files</b>	<a href="#">LPSD-362-EM-Barton Form 2107_Redacted.pdf</a>
<b>Consultee Name</b>	Mrs Dawn Ralph
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	1323601
<b>Agent Name</b>	Mr Philip Barton
<b>Position</b>	
<b>Company / Organisation</b>	Philip Barton MCD BA (Hons) MRTPI
<b>Number</b>	Policy WP 8.1
<b>Title</b>	Green Belt
<b>To which part of the Local Plan does this representation relate?</b>	Policies Map
<ul style="list-style-type: none"> <li>* Paragraph(s)</li> <li>* Policy</li> <li>* Site</li> <li>* Policies Map</li> <li>* Sustainability</li> <li>* Appraisal</li> <li>* Habitat</li> <li>* Regulations</li> <li>* Assessment</li> </ul>	
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this</b>	

<b>representation relates to.</b>	
<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	main Policies Map
<b>Legally compliant</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
<b>Please give details of why you consider the Local Plan is unsound. Please be</b>	<p>Please refer to attachment</p> <p>The proposed plan is not sound because the decision not to change the green belt boundary in any way has not been adequately justified. The reasons for this are:</p> <p>1) The Castlefields Estate (the Estate) in Leasowe (see Appendix A for geographic extent) has been in residential use since the 1920s and has more in common, in land-use terms, with the primarily residential areas on the opposite side of Leasowe Road than with the market garden and other agricultural businesses in the adjacent green belt;</p>

<p><b>as precise as possible.</b></p>	<p>2) The Castlefields Estate does not meet all of the purposes of designating green belt, as set out in paragraph 138 of the National Planning Policy Framework (NPPF), namely:</p> <p>a) To check the unrestricted urban sprawl of large built-up areas. The Estate has discrete boundaries and was already developed when the green belt was first established (see Appendix B for 1926 and 1935 Ordnance Survey plans). So, the Estate makes no contribution to fulfilling this purpose;</p> <p>b) To prevent neighbouring towns merging into one another. There is nothing beyond the Estate apart from a golf course and Liverpool Bay. So, the Estate makes no contribution to fulfilling this purpose;</p> <p>c) To assist in safeguarding the countryside from encroachment. The Estate was laid out sometime before 1925. It has had a residential use ever since and its discrete boundaries mean that encroachment into the countryside could not take place, so it makes no contribution to fulfilling this purpose;</p> <p>d) To preserve the setting and special character of historic towns. The closes historic town is Chester, so the Estate cannot fulfil this purpose, and</p> <p>e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The Estate is previously developed land and many of the owners have implemented permitted development-led schemes that have improved their homes. As the Estate was already in residential use when the green belt was originally designated, the contribution that the Estate can make to fulfilling this purpose is limited unless the Government were to decide to remove permitted development rights from owners of property in the green belt. Thus, this is the only purpose of the green belt that the site can contribute to and the value of this contribution is limited.</p> <p>3) Some of the properties on the Estate are unfit for human habitation (see Appendix C for an example of an unaltered dwelling), but the council still rigorously applies green belt policies in the face of reasonable requests to replace them with dwellings that meet modern standards of insulation and structural integrity. This may be a breach of the Article 8 Rights of occupants because they are denied decent living conditions.</p> <p>4) So, in terms of NPPF paragraph 143:</p> <p>a) Ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development. The Estate is previously developed land and a continued residential use is therefore sustainable. Preventing owners from developing their properties and sterilising the land for development is likely to lead to abandonment and dereliction and some limited opportunity for intensification of the existing residential use would be consistent with the council's policy of increasing density in existing residential areas;</p> <p>b) Not include land which it is unnecessary to keep permanently open. The Estate has been in residential use since the existing planning system came into being on 1 July 1948. As outlined above, it makes only a very limited contribution to fulfilling one of the five purposes of designating green belts. Consequently, it is unnecessary for the Estate to be included within the green belt;</p> <p>c) Where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period. This criterion is not relevant;</p> <p>d) Make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development. This criterion is not relevant;</p> <p>e) Be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period. The long-established and discrete boundaries of the Estate have not changed since before 1925 and will not change by the end of the plan period, and</p> <p>f) Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent. The long-established and discrete boundaries of the Estate have not changed since before 1925 and are readily recognisable.</p> <p>5) In terms of planning positively to enhance the beneficial use of the green belt, as required by NPPF paragraph 145, the Estate is in private ownership and there is no scope for providing access to the countryside; to provide opportunities for outdoor sport and recreation, or to retain and enhance landscapes, visual amenity and biodiversity. There is scope to improve damaged and derelict land due to abandonment but it is primarily the council's rigid application of green belt policy that prevents this. Given the size of the remaining existing dwellings, the 15% limit on the increase in size of dwellings in the Unitary Development Plan is insufficient to deliver acceptable living conditions in most cases. This leads to sprawling permitted development-led schemes, which do not make the best use of the opportunity to improve visual amenity and biodiversity or to improve damaged and derelict land.</p>
<p><b>omplies with the Duty to co-operate</b> * Yes * No</p>	<p>Yes</p>
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	

<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	<p>Not applicable</p>
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	<p>Not Applicable</p>
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You</b></p>	<p>The Castlefields Estate (see Appendix A for extent) should be removed from the green belt and redefined on the relevant policies map(s) as a primarily residential area.</p>



<p>will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>The Inspector may benefit from hearing from people living on the Castlefields Estate of their experience of trying to improve their properties and living conditions.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the</p>	<p>Yes</p>

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

**\* Yes**

**\* No**

<b>Comment ID</b>	LPSD-363
<b>Person ID</b>	1241495
<b>Include files</b>	
<b>Consultee Name</b>	Mrs Lesley Brockbank
<b>Position</b>	Wirral Coordinator
<b>Company / Organisation</b>	Wirral & Cheshire Badger Group
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 5.1
<b>Title</b>	Green and Blue Infrastructure Networks
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 5.1
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> *     Yes *     No	Yes
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *     Yes *     No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> *     Not Positively Prepared *     Not Justified *     Not Effective *     Not Consistent with National Policy	Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	B - "financial contributions will be sought". C - "At all times appropriate plant and tree species should be selected which includes native species and those of local provenance."

<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>	<p>B - should read <i>"financial contributions will be <b>required</b>"</i></p> <p>C - should read <i>"native and other wildlife friendly species should be selected to support BNG and to be of UK provenance (to reduce risk of disease &amp; pests)."</i></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><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>No, I do not wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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<b>Comment ID</b>	LPSD-364
<b>Person ID</b>	1241495
<b>Include files</b>	
<b>Consultee Name</b>	Mrs Lesley Brockbank
<b>Position</b>	Wirral Coordinator
<b>Company / Organisation</b>	Wirral & Cheshire Badger Group
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 5.4
<b>Title</b>	Ecological Networks
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 5.4 L1
<b>Please state which Site ID/Reference this representation relates to.</b>	



<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> *        Yes *        No	Yes
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *        Yes *        No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> *        Not Positively Prepared *        Not Justified *        Not Effective *        Not Consistent with National Policy	Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	<p>L 1. – NIAs should be extended from north end of NIA 3 to join south of NIA 6.</p> <p>M – need to define “recent”- If recent detrimental change or damage has occurred to the biodiversity value of the site then the most recent survey undertaken before the change, or an appropriate habitat typology will be applied as the baseline from which net gain will be calculated.</p>

<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	Yes
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>	<p>L 1. – NIAs should be extended from north end of NIA 3 to join south of NIA 6. This would safeguard an essential corridor for wildlife movement.</p> <p>M - define "<b>recent</b>" - clarify after Jan 2020 when Environment Act was put before Parliament. Assessment of habitat typology to be as in DEFRA Biodiversity Metric 3.0. Recently cleared sites to be assessed according to their pre clearance state.</p> <p>In assessing BNG the effects of the proposed development on adjacent land must also be considered where that land has value for biodiversity.</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><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>No, I do not wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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<b>Comment ID</b>	LPSD-365
<b>Person ID</b>	1241495
<b>Include files</b>	
<b>Consultee Name</b>	Mrs Lesley Brockbank
<b>Position</b>	Wirral Coordinator
<b>Company / Organisation</b>	Wirral & Cheshire Badger Group
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 5.7
<b>Title</b>	Maintenance of Green Infrastructure and Open Space Provision
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 5.7
<b>Please state which Site ID/Reference this representation relates to.</b>	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	clauses inconsistent – Policy R states "management & maintenance throughout the lifetime of the development", para 3.142 states "management and maintenance for a 30 year period."

<b>omplies with the Duty to co-operate</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	
<b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b>	Should read <i>"for the lifetime of the development or a 30 year period whichever is longer."</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><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>No, I do not wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	



<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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<b>Comment ID</b>	LPSD-366
<b>Person ID</b>	1241495
<b>Include files</b>	
<b>Consultee Name</b>	Mrs Lesley Brockbank
<b>Position</b>	Wirral Coordinator
<b>Company / Organisation</b>	Wirral & Cheshire Badger Group
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 7.1
<b>Title</b>	Design Principles
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 7.1
<b>Please state which Site ID/Reference this representation relates to.</b>	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	"provide for the protection and enhancement of existing healthy trees and hedgerows of visual and wildlife value" Need to define "healthy"

<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>	<p>Need to define “<i>healthy</i>” tree. Trees in classes A, B &amp; C (as currently assessed in surveys) should be retained <b>but</b> “<i>dead</i>” trees also provide an important habitat for biodiversity and should be retained where possible.</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><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>No, I do not wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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<b>Comment ID</b>	LPSD-369
<b>Person ID</b>	1323637
<b>Include files</b>	<a href="#">LPSD-369-PDF-Fitzgerald-2307-Redacted.pdf</a>
<b>Consultee Name</b>	Mr Peter Fitzgerald
<b>Position</b>	Community representative
<b>Company / Organisation</b>	Grange Road, Darmons Green, Ashburton Road, Heatherdean Road and Gerard Road Residents
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Appendix 13
<b>Title</b>	Local Green Space
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	LGS-SA6.3

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> *        Yes *        No	Yes
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	It is prepared with all legal protocol being adhered to
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *        Yes *        No	Yes
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	It is prepared in a sound manner reflecting the wishes and concerns of the community which it effects.
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> *        Not Positively Prepared *        Not Justified *        Not Effective *        Not Consistent with National Policy	
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	



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

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

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

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

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

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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<b>Comment ID</b>	LPSD-370
<b>Person ID</b>	1243890
<b>Include files</b>	<a href="#">LPSD-370 Motorcycle Action Group Attach_Redacted.pdf</a>
<b>Consultee Name</b>	Mr David Pearson
<b>Position</b>	Wirral Rep
<b>Company / Organisation</b>	Motorcycle Action Group
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 9.3
<b>Title</b>	Servicing Development
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 9.3
<b>Please state which Site ID/Reference this representation relates to.</b>	

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.	secure motorcycle parking and charging points required

<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>	<p>Wirral branch of Motorcycle Action Group would like to see secure motorcycle parking provided at electric vehicle charging points (as well as all other car parks in Wirral). If we have to leave an electric motorcycle for a few hours to charge, it needs to be securable at the charging point. I attach guidelines for secure parking and can supply details of companies who do the installation. The secure parking can be suitable for pushbikes and electric bikes too.</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><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	<p>I am willing to attend a hearing session if clarification required but don't personally feel it necessary.</p>

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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<b>Comment ID</b>	LPSD-371
<b>Person ID</b>	1241495
<b>Include files</b>	
<b>Consultee Name</b>	Mrs Lesley Brockbank
<b>Position</b>	Wirral Coordinator
<b>Company / Organisation</b>	Wirral & Cheshire Badger Group
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WD 1.2
<b>Title</b>	Trees
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WD1.2
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	F3/5 Ensure that trees to be retained have "adequate space" in order to prevent damage to their canopy or root structure during construction and to allow for the future growth of canopy and roots to normal mature sizes.  Need to define "adequate space" and include trees on adjacent land.

<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 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>Need to include the size of buffer zone needed. Recommend 40m from trunk. Likewise the root protection zones of trees on adjacent land must also be protected.</p> <p><i>"Ensure that trees to be retained on site and <b>including those on adjacent landhave 40m buffer zone from trunk</b> in order to prevent damage to their canopy or root structure during construction and to allow for the future growth of canopy and roots to normal mature sizes;"</i></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><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>No, I do not wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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<b>Comment ID</b>	LPSD-372
<b>Person ID</b>	1241495
<b>Include files</b>	
<b>Consultee Name</b>	Mrs Lesley Brockbank
<b>Position</b>	Wirral Coordinator
<b>Company / Organisation</b>	Wirral & Cheshire Badger Group
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WD 3
<b>Title</b>	Biodiversity and Geodiversity
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WD3 and 6.29
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	<p>The Policy only refers to development on protected sites. There is nothing about the effects a proposed development may have on adjacent land which is a protected site where there is value for biodiversity.</p> <p>There is nothing about buffer zones to avoid or mitigate damage from adjacent/nearby development.</p> <p>6.29 "Preliminary Ecological Appraisal (PEA) and Ecological Impact Assessment (EclA) required under Policy WD 3.E. must be undertaken by a suitably qualified ecologist"</p> <p>Need to define "suitably qualified ecologist"</p>

<b>omplies with the Duty to co-operate</b> *     Yes *     No	Yes
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	
<b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b>	<p>When determining an application (including BNG) an assessment will be made of the effects of the proposed development on, adjacent to or likely to affect protected sites, species or habitats.</p> <p>Buffer zones to be included to retain and enhance the wildlife value of protected sites, species and habitats. To buffer protected sites against effects of the development there should be a maintained buffer of semi-natural vegetation of at least 20m and preferably 30m width between development and the protected site or habitat.</p> <p>Where the protected site or habitat contains trees, sufficient space will be left between any building and the woodland to avoid risk of householder demands to fell trees. Therefore buildings to be at least 40m from the nearest trees.</p>



<p><b>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>Consideration should also be given to other aspects of the development that could affect the protected site or habitat, including controlling human access; maintaining free movement of wildlife e.g. hedgehogs, badgers; effects of artificial light at night; noise and domestic pets.</p> <p>6.29 - This should be strengthened to <i>"a suitably qualified (and experienced) ecologist, preferably a member of a professional body"</i>.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>No, I do not wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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<b>Comment ID</b>	LPSD-373
<b>Person ID</b>	1241495
<b>Include files</b>	
<b>Consultee Name</b>	Mrs Lesley Brockbank
<b>Position</b>	Wirral Coordinator
<b>Company / Organisation</b>	Wirral & Cheshire Badger Group
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Appendix 17
<b>Title</b>	Environmental Designations
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
<b>Please state which paragraph number(s) this representation relates to.</b>	Appendix 17 Local Wildlife Sites
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	Hoylake Langfields & Bidston Moss Community Woodlands are missing from the list although shown on Fig 2.6. Two other new sites Ditton Lane & Old Hall Farm hedges are listed but should be listed as proposed. 9Consequently Fig 3.8 is inaccurate

<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>	<p>Add Hoylake Langfields &amp; Bidston Moss Community Woodlands to the list.</p> <p>List Ditton Lane &amp; Old Hall Farm hedges as proposed.</p> <p>Clarify if Irby Quarry &amp; Old Sewage Works Clatterbridge are to be deleted.</p> <p>Amend Fig 3.8</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><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>No, I do not wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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<b>Comment ID</b>	LPSD-377
<b>Person ID</b>	1323659
<b>Include files</b>	
<b>Consultee Name</b>	Sean Martin
<b>Position</b>	Chair
<b>Company / Organisation</b>	New Brighton Coastal Community Team
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy RA 10
<b>Title</b>	New Brighton Regeneration Area
<b>To which part of the Local Plan does this representation relate?</b>	Policy
<ul style="list-style-type: none"> <li>* Paragraph(s)</li> <li>* Policy</li> <li>* Site</li> <li>* Policies Map</li> <li>* Sustainability Appraisal</li> <li>* Habitat Regulations Assessment</li> </ul>	
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	Policy RA 10
<b>Please state which Site ID/Reference this representation relates to.</b>	



<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	<p>We as a group that represent a number of New Brighton Businesses, Community Groups and residents are concerned at the plans to further intensify housing on the East side of Wirral. We have serious concerns with this plan as it designates New Brighton as a "Broad location for housing growth" The plan commits New Brighton to deliver 315 new homes over the next 15 years. To put this in context the plan commits Hoylake, Meols, West Kirby, Newtown, Caldy, Irby, Thingwall, Pensby, Heswall and Gayton between them to deliver a total of 92 homes. Liscard is to deliver 200 homes, Seacombe 1,240 homes and Wirral Waters 3,300 homes. Other large areas for housing development are Birkenhead and Bromborough which between them have to deliver many thousands. As you can see over 90% of the housing is set to be built in some of the more deprived areas of the Borough and a lot of it is in New Brighton or on our doorstep</p>

	<p>However, our main concern is New Brighton and where these homes will be built. In almost every other area it is clearly stated where the housing development will take place. For New Brighton it states where 55 units will be but then it states that the other 250 will be in "other developable areas" We met with Keith Keeley and Hannah Austin in April and they were unable or unwilling to tell us which sites were being considered for these housing units. I then emailed them last week and Hannah replied that the New Brighton Neighbourhood Framework was delayed due to capacity issues. I emailed our 3 ward Councillor's last week and Councillor Paul Martin replied that they do not have a confirmed list of sites yet but that they did have some meetings with Officers where they gave some feedback but they are still waiting for the final draft of the Masterplan!!</p> <p>And there lies the problem!! We are supposed to agree to the Local Plan and trust that the Council will do the right thing by us when they finally get around to the New Brighton Neighbourhood Framework!!</p> <p>We cannot accept this as we believe the only way you can fit 315 new housing units into an already very heavily developed New Brighton is to build on our Green Spaces. Why as a community should we agree to something and then wait to see what we are agreeing to?</p> <p>What about the dismal transport links to New Brighton? What about the Schools and GP's and Dentists to cope with the extra demand that further housing will place on these services. What about things for the kids to do, places for them to play safely</p> <p>Further Housing intensification means small or no gardens which means we have to rely even more on our Green Spaces</p> <p>When we have to fight a losing battle with our Council on a daily basis to provide such basic things as public toilets and litter bins can we really be expected to trust them to deliver for us in this Local Plan when the part of the plan that deals with New Brighton "The Neighbourhood Framework?? is not even complete??</p> <p>How can this Local Plan be approved when it will have such an impact on our town and they cannot even tell us yet what plans they have or where they are going to put 250 out of 315 new housing units? And the fact that one of the reasons they give us for not being able to provide us with the plan for our area is because of "capacity issues" which is Council talk for not enough staff makes us even more concerned</p> <p>On behalf of the New Brighton Coastal Community Team we reject this plan until the New Brighton Neighbourhood Framework is completed and consulted on.</p>
<b>complies with the Duty to co-operate</b> * Yes * No	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability</b>	

Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>The New Brighton Neighbourhood Framework needs to be completed so residents of New Brighton can then look at the Local Plan and make a decision</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><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

<b>Comment ID</b>	LPSD-378
<b>Person ID</b>	1323660
<b>Include files</b>	
<b>Consultee Name</b>	Mrs Colette Simmons
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WP 1
<b>Title</b>	Policy for Wallasey
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	LGS -SA1.9 Tower Grounds

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> *        Yes *        No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *        Yes *        No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> *        Not Positively Prepared *        Not Justified *        Not Effective *        Not Consistent with National Policy	Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	<p>The plan in relation to New Brighton appears to include Tower Grounds area in the broad development/ housing for the area.</p> <p>The plan discusses the need “ to support the natural and built heritage assets.</p> <p>Tower grounds is one of the main areas on the stretch of coast between seacombe and Wallasey village that provides a natural habitat with a large diversity of floral and insect species.</p> <p>The trees on the site are mature and it would be detrimental to the environment to build on the area if destroying this habitat happens.</p> <p>The grounds themselves are used daily by locals and visitors for various activities. Walking, skateboarding,bike riding ,dog walking and is home to local footballs teams which would have nowhere else's to play should the area be developed .</p>

	<p>It is the only local recreational park area that has facilities suitable for adolescents and is used by local youth clubs, school and a school on Victoria rd which offers education to children who are gifted at sports.</p> <p>The development of the grounds would prevent these groups from having an accessible local area for their activities ,which I believe would be in direct conflict of the policies promise to address the local shortfall of natural open spaces and playing places ( 5:12 (9)</p> <p>The main access rd onto the grounds is already overly busy with vehicles using it to access the promenade and parking is extremely limited .</p> <p>The rd is home to sheltered housing schemes and has recently been developed to the top with accessible shared housing and affordable rented properties.</p> <p>The grounds themselves, despite the building no longer on them has an historic interest from both the “ Tower Building / Fairground but also the “ Football Team that played on the grounds between 1896 and 1901.</p> <p>The grounds are incorporated in the “Tour of New Brighton” which /rings tourists to the are .</p>
<b>omplies with the Duty to co-operate</b> *      Yes *      No	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the</b>	

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

<b>Comment ID</b>	LPSD-379
<b>Person ID</b>	1240223
<b>Include files</b>	<a href="#">LPSD-379-Aylward_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Mark Aylward
<b>Position</b>	Director
<b>Company / Organisation</b>	ATP on behalf of Derwent Development Management Ltd
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 2
<b>Title</b>	Social Value
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS2
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	No comment.
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	<p>Draft Policy WS2 needs to be revised to ensure that it only applies to more significant development where activity will include those elements where there can be tangible contribution towards achieving these objectives. This comprises the insertion of text to provide more clarity as to the scope of Policy WS2. We recommend the revisions set out in Section 6 to the text of the three Policy WS2 clauses that would better reflect this approach:</p> <p>These changes to draft Policy WS2 provide an exceptions clause which would ensure that those major developments which do not give rise to significant construction activity are excluded. These types of major development could include:</p> <ul style="list-style-type: none"> <li>• S73 revisions to an approved scheme to amend operating hours;</li> <li>• S73 revisions to an approved scheme to amend the types of permitted users; and</li> </ul>

	<ul style="list-style-type: none"> <li>• Change of use of an existing premises.</li> </ul>
<b>omplies with the Duty to co-operate</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	No comment.
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	
<b>Please set out the modification(s) you</b>	<p>Exclude major development which does not cause significant construction activity from Policy WS2.</p> <p><i>A. Major development that would result in significant additional construction activity will be required to demonstrate that it is located, designed, constructed and operated in a manner that, where appropriate, delivers net social gain in support of the economic, health and cultural wellbeing of the local community.</i></p> <p><i>B. Major development proposals that would result in significant additional construction activity will include a social value statement that explains how the development will secure and deliver social benefits that would arise from the proposals over the lifetime of the development including as appropriate:</i></p>

<p><b>consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>1. Local labour policy for construction and occupation of the development covering skills and training provision including apprenticeships; and</p> <p>2. Local sourcing of products and materials.</p> <p>C. In respect of major development proposals that would result in significant additional construction activity, where appropriate, the Council will seek to enter into a planning agreement and/or impose conditions relating to the use of local labour and provision of training and skills for local communities using an agreed employment and skills plan.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the</b></p>	<p>To assist the Inspector in drawing out evidence from the Council and a revised policy approach capable of the Plan being found sound.</p>

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

<b>Comment ID</b>	LPSD-380
<b>Person ID</b>	1240223
<b>Include files</b>	<a href="#">LPSD-380-Aylward_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Mark Aylward
<b>Position</b>	Director
<b>Company / Organisation</b>	ATP on behalf of Derwent Development Management Ltd
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 4.2
<b>Title</b>	Designated Employment Areas
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS4.2
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	No comment.
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	<p>Draft Policy WS 4.2 is concerned with seeking to ensure that important existing employment locations are retained for traditional employment uses (it cites Use Classes B2 and B8) and resists other uses other than in compliance with a criterion-driven approach. The policy would be read in tandem with the Proposals Map which highlights which land parcels are designated as being Primarily Employment Areas.</p> <p>Whilst there are numerous sites/areas where this might be appropriate, we point to two areas where these designations would be inappropriate because B2/B8 uses do not reflect the established use of these areas. These comprise:</p> <ul style="list-style-type: none"> <li>• Junction One Retail Park, CH44 2HE; and</li> <li>• Prenton Business Park and Total Fitness.</li> </ul>



	The resolution of this conflict would be to either fundamentally revise the policy text, or to agree that these land parcels should not be designated under Policy WS4.2. Our recommendation is that these sites should not be designated on the Proposals Map under Policy WS4.2.
<b>omplies with the Duty to co-operate</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	No comment.
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	
<b>Please set out the modification(s) you consider necessary to make the Local</b>	Do not designate sites Junction One Retail Park, CH44 2HE and Prenton Business Park and Total Fitness for B2 and B8 uses in the Local Plan. The resolution of this conflict would be to either fundamentally revise the policy text, or to agree that these land parcels should not be designated under Policy WS4.2. Our recommendation is that the following sites should not be designated on the Proposals Map under Policy WS4.2. • Junction One Retail Park, CH44 2HE; and

<p><b>Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<ul style="list-style-type: none"> <li>• Prenton Business Park and Total Fitness.</li> </ul>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the hearing session(s), please outline why</b></p>	<p>To assist the Inspector in drawing out evidence from the Council and a revised policy approach capable of the Plan being found sound.</p>

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

<b>Comment ID</b>	LPSD-381
<b>Person ID</b>	1240223
<b>Include files</b>	<a href="#">LPSD-381-Aylward_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Mark Aylward
<b>Position</b>	Director
<b>Company / Organisation</b>	ATP on behalf of Derwent Development Management Ltd
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 8.2
<b>Title</b>	Sustainable Construction – Energy Efficiency, Overheating and Cooling, and Water Usage
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS8.2
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	No comment.
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	<p>Draft Policy WS 8.2 is concerned with seeking to ensure that new development contributes towards the realisation of wider objectives that seek to tackle the adverse implications of climate change.</p> <p>The Government has made clear that the preferred approach to taking this strategy forward is through advancements to Building Regulations which include very significant changes that came into force during June 2022. Clause 2 of draft Policy WS8.2 would introduce different requirements in terms of "Space Heating Demand" and "Energy Use Intensities" and set threshold performance levels accordingly. This is not an approach which we are familiar with and it is unclear that any such requirements have been assessed as part of a "policy on" viability approach.</p>

	We would recommend that the text in Clause 2 that relates to these kilowatt hour performance standards should be deleted and replaced by reference to Building Regs standards which are better understood and endorsed by Government.
<b>omplies with the Duty to co-operate</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	No comment.
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	
<b>Please set out the modification(s) you consider necessary to make the Local</b>	Replace kilowatt hour performance standards with Building Regulations in Policy WS8.2 of the Local Plan. The resolution of this conflict would be to delete the text in Clause 2 that relates to these kilowatt hour performance standards. If thought necessary to do so, it should be replaced by reference to Building Regs standards which are better understood and endorsed by Government.

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

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



<b>Comment ID</b>	LPSD-382
<b>Person ID</b>	1240223
<b>Include files</b>	<a href="#">LPSD-382-Aylward_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Mark Aylward
<b>Position</b>	Director
<b>Company / Organisation</b>	ATP on behalf of Derwent Development Management Ltd
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 8.4
<b>Title</b>	On site Renewable and Low Carbon Energy
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS8.4
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	No comment.
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	<p>Draft Policy WS 8.4 is concerned with seeking to ensure that new development contributes towards the realisation of wider objectives that seek to tackle the adverse implications of climate change. Specifically, it seeks to ensure that developments consider opportunities for renewable and low carbon technology.</p> <p>Draft Policy WS8.4 needs to be revised to ensure that it only applies to more significant development where activity will include those elements where there can be tangible contribution towards achieving these objectives. This comprises the insertion of text to provide more clarity as to the scope of Policy WS8.4. We recommend the revisions set out in Section 6 to the text that would better reflect this approach:</p> <p>These changes to draft Policy WS8.4 provide an exceptions clause which would ensure that it excludes all minor development and would only capture those major developments which give rise to significant construction activity. The types of major development which should be caught by this exception could include:</p>

	<ul style="list-style-type: none"> <li>• S73 revisions to an approved scheme to amend operating hours;</li> <li>• S73 revisions to an approved scheme to amend the types of permitted users; and</li> <li>• Change of use of an existing premises.</li> </ul>
<b>omplies with the Duty to co-operate</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	No comment.
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	
<b>Please set out the modification(s) you consider necessary</b>	<p>Exclude minor development from Policy WS8.4.</p> <p>The resolution of this conflict would be to amend the text in draft Policy WS 8.4 as set out below:</p>

<p><b>to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p><i>Major Development proposals that involve significant additional construction activity should demonstrate how residual carbon emissions can be addressed through the use of on-site renewable and low carbon energy supplies, unless it is demonstrated that the scheme is not suitable or feasible for this form of energy provision.</i></p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the hearing session(s),</b></p>	<p>To assist the Inspector in drawing out evidence from the Council and a revised policy approach capable of the Plan being found sound.</p>

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

<b>Comment ID</b>	LPSD-383
<b>Person ID</b>	1240223
<b>Include files</b>	<a href="#">LPSD-383-Aylward_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Mark Aylward
<b>Position</b>	Director
<b>Company / Organisation</b>	ATP on behalf of Derwent Development Management Ltd
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 8.5
<b>Title</b>	Carbon Compensation through Renewable and Low Carbon Energy
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS8.5
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	No comment.
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	<p>Draft Policy WS 8.5 is concerned with seeking to ensure that new development contributes towards the realisation of wider objectives that seek to tackle the adverse implications of climate change. Specifically, it seeks to ensure that developments consider opportunities for carbon compensation where ambitions in connection with zero carbon development cannot be met by that scheme.</p> <p>Draft Policy WS8.5 needs to be revised to ensure that it only applies to more significant development where activity will include those elements where there can be tangible contribution towards achieving these objectives. This comprises the insertion of text to provide more clarity as to the scope of Policy WS8.5. We recommend the revisions set out in Section 6 to the text that would better reflect this approach:</p>

	<p>These changes to draft Policy WS8.5 provide an exceptions clause which would ensure that it excludes all minor development and would only capture those major developments which give rise to significant construction activity. The types of major development which should be caught by this exception could include:</p> <ul style="list-style-type: none"> <li>• S73 revisions to an approved scheme to amend operating hours;</li> <li>• S73 revisions to an approved scheme to amend the types of permitted users; and</li> <li>• Change of use of an existing premises.</li> </ul>
<b>omplies with the Duty to co-operate</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	No comment.
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	No comment.
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	No comment.



<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>Amend Policy WS8.5 to only cover major development proposals that involve significant additional construction activity.</p> <p>The resolution of this conflict would be to amend the text in draft Policy WS 8.5 as set out below:</p> <p><i>Where a major development proposal that involves significant additional construction activity cannot demonstrate that net zero carbon can be met on-site, applicants should demonstrate how residual carbon emissions can be addressed with renewable energy sources off-site, and make provision where feasible.</i></p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	<p>To assist the Inspector in drawing out evidence from the Council and a revised policy approach capable of the Plan being found sound.</p>
<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>

<b>Comment ID</b>	LPSD-384
<b>Person ID</b>	1240223
<b>Include files</b>	<a href="#">LPSD-384-Aylward_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Mark Aylward
<b>Position</b>	Director
<b>Company / Organisation</b>	ATP on behalf of Derwent Development Management Ltd
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 8.8
<b>Title</b>	Climate Change and Energy Statement
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS8.8
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	No comment.
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	<p>Draft Policy WS 8.8 is concerned with seeking to ensure that new development contributes towards the realisation of wider objectives that seek to tackle the adverse implications of climate change. Specifically, it seeks to ensure that developments consider opportunities for climate change and to minimise energy use.</p> <p>Draft Policy WS8.8 needs to be revised to ensure that it only applies to more significant development where activity will include those elements where there can be tangible contribution towards achieving these objectives. This comprises the insertion of text to provide more clarity as to the scope of Policy WS8.8. We recommend the revisions set out in Section 6 to the text that would better reflect this approach:</p> <p>These changes to draft Policy WS8.8 provide an exceptions clause which would ensure that it excludes all minor development and would only capture those major developments which give rise to significant construction activity. The types of major development which should be caught by this exception could include:</p>

	<ul style="list-style-type: none"> <li>• S73 revisions to an approved scheme to amend operating hours;</li> <li>• S73 revisions to an approved scheme to amend the types of permitted users; and</li> <li>• Change of use of an existing premises.</li> </ul>
<b>omplies with the Duty to co-operate</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	No comment.
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	
<b>Please set out the modification(s) you</b>	Amend Policy WS 8.8 to only cover major development that involves significant additional construction activity. The resolution of this conflict would be to amend the text in draft Policy WS 8.8 as set out below: <i>All major development that involve significant additional construction activity will be required to submit an Energy and Climate Statement. This will demonstrate</i>

<p><b>consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p><i>compliance with all relevant aspects of Policy WS8. The statement will incorporate a Whole Life Cycle Carbon Emission Assessment, using a recognised methodology, to demonstrate actions taken to reduce operational and embodied carbon from the land use change, construction and use of the building over its entire life.</i></p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the</b></p>	<p>To assist the Inspector in drawing out evidence from the Council and a revised policy approach capable of the Plan being found sound.</p>

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

<b>Comment ID</b>	LPSD-385
<b>Person ID</b>	1240223
<b>Include files</b>	<a href="#">LPSD-385-Aylward_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Mark Aylward
<b>Position</b>	Director
<b>Company / Organisation</b>	ATP on behalf of Derwent Development Management Ltd
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WD 18
<b>Title</b>	Health Impact Assessment
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WD18
<b>Please state which Site ID/Reference this representation relates to.</b>	



<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	No comment.
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	<p>Draft Policy WD18 is concerned with seeking to ensure that new development contributes towards the realisation of wider objectives that seek to optimise the net implications of new development on public health. Specifically, it seeks to ensure that developments consider opportunities for mitigating adverse impacts and maximising positive impacts.</p> <p>Draft Policy WD18 needs to be revised to ensure that it only applies to more significant development where activity will include those elements where there can be tangible contribution towards achieving these objectives. This comprises the insertion of text to provide more clarity as to the scope of Policy W18. We recommend the revisions set out in Section 6 to the text that would better reflect this approach:</p> <p>These changes to draft Policy WD18 provide an exceptions clause which would ensure that it would only capture those major commercial developments which give rise to significant construction activity. The types of major development which should be caught by this exception could include:</p>

	<ul style="list-style-type: none"> <li>• S73 revisions to an approved scheme to amend operating hours;</li> <li>• S73 revisions to an approved scheme to amend the types of permitted users; and</li> <li>• Change of use of an existing premises.</li> </ul>
<b>omplies with the Duty to co-operate</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	No comment.
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	
<b>Please set out the modification(s) you consider necessary</b>	Amend Policy WD18 to cover major non-residential developments of 1,000 square metres or more that involve significant additional construction activity. The resolution of this conflict would be to amend the text in draft Policy WD18 as set out below: <i>A. A Health impact assessment, in accordance with the Council's Development Management Validation Checklist will be required for applications for:</i> <ul style="list-style-type: none"> <li>• major residential development of 10 dwellings or more;</li> <li>• Major non-residential developments of 1,000 square metres or more that involve significant</li> </ul>

<p>to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p><i>additional construction activity; and • other development likely to have a significant impact on health and well being. B. If adverse impacts are identified, proposals will need to demonstrate how these will be addressed.</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),</p>	<p>To assist the Inspector in drawing out evidence from the Council and a revised policy approach capable of the Plan being found sound.</p>

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

<b>Comment ID</b>	LPSD-386
<b>Person ID</b>	1247740
<b>Include files</b>	<a href="#">LPSD-386,387 &amp; 997-EM-Underwood Attach 2107_Redacted.pdf</a> <a href="#">LPSD-386-EM-Underwood Form 1 of 2 2107_Redacted.pdf</a>
<b>Consultee Name</b>	Universities Superannuation Scheme
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	1323663
<b>Agent Name</b>	Mr Mark Underwood
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 11.3
<b>Title</b>	Town and Local Centre Impact Assessments
<b>To which part of the Local Plan does this representation relate?</b>	Policy
<ul style="list-style-type: none"> <li>* Paragraph(s)</li> <li>* Policy</li> <li>* Site</li> <li>* Policies Map</li> <li>* Sustainability Appraisal</li> <li>* Habitat Regulations Assessment</li> </ul>	
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 11.3
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	The proposed RIA threshold in the draft Local Plan (2022) has reduced significantly in comparison with the adopted UDP (2000), and the National Planning Policy Framework (NPPF) (2021). The current RIA threshold in the UDP (2000) is 20,000 sqm of floorspace for major retail development, in line with the

<p><b>as precise as possible.</b></p>	<p>then national threshold. The default RIA threshold in the NPPF (2021) is 2,500 sqm of gross floorspace for retail proposals outside designated town centres, if there is not a locally set threshold. The proposed RIA threshold in the draft Local Plan (2022) is therefore not in line with the recommendation in the NPPF. The Levelling-up and Regeneration Bill (May 2022) reinforces the primacy of national development management policy over local policies.</p> <p>Paragraph 3.238 of the draft Local Plan (2022) confirms that 'the thresholds for the size of proposal requiring an impact assessment for the different centres are drawn from the evidence provided by the April 2021 Wirral Retail &amp; centres Study Capacity update'. However, neither the draft Local Plan nor the Study explain how this has been calculated.</p>
<p><b>omplies with the Duty to co-operate</b>  *      Yes  *      No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in</b></p>	

<p>relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>Please refer to Attachment</p> <p>Policy WS11.3 wording should be amended in that RIA requirements will be undertaken in a proportionate and appropriate way, commensurate to the scale of the development proposed, in line with Government guidance.</p> <p>WS 11.3 necessary wording takes a positive and forward-looking approach to how buildings and land will be used in future. To provide flexibility for landlords to respond to market and consumer changes, and to minimise levels of vacancy across the whole of the authority, including existing out of town locations, it is recommended that the Plan is consistent with the threshold contained in the NPPF.</p> <p>Explain how thresholds have been calculated.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>  * 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>

## LPSD-387

<b>Comment ID</b>	LPSD-387
<b>Person ID</b>	1247740
<b>Include files</b>	<a href="#">LPSD-387-EM-Underwood Form 2 of 2 2107_Redacted.pdf</a> <a href="#">LPSD-386,387 &amp; 997-EM-Underwood Attach 2107_Redacted.pdf</a>
<b>Consultee Name</b>	Universities Superannuation Scheme
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	1323663
<b>Agent Name</b>	Mr Mark Underwood
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 4.2
<b>Title</b>	Designated Employment Areas
<b>To which part of the Local Plan does this representation relate?</b>	Policies Map
<ul style="list-style-type: none"> <li>* Paragraph(s)</li> <li>* Policy</li> <li>* Site</li> <li>* Policies Map</li> <li>* Sustainability Appraisal</li> <li>* Habitat Regulations Assessment</li> </ul>	
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this</b>	

<b>representation relates to.</b>	
<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	Birkenhead - North East (2022)
<b>Legally compliant</b> *      Yes *      No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *      Yes *      No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> *      Not Positively Prepared *      Not Justified *      Not Effective *      Not Consistent with National Policy	Not Justified Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be</b>	Please refer to attachment

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	Please refer to attachment Policy Map change - The Croft Retail and Leisure Park, Welton Road, Bromborough - to be mixed use with retail uses

<p><b>Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>USS owns the freehold of The Croft Retail and Leisure Park, Welton Road, Bromborough, CH62 3PN ('the Site'). Therefore recommend that the draft Local Plan (2022) allocates the Site for future 'mixed-use development' or explicitly supports retail uses at the Site. The mix of uses should include both residential and commercial uses, including retail, to provide flexibility. Whilst USS supports employment uses, flexibility for future uses should be retained for the Site.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>No, I do not wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the hearing session(s), please outline why</b></p>	

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

<b>Comment ID</b>	LPSD-388
<b>Person ID</b>	1269966
<b>Include files</b>	<a href="#">LPSD-388-EM-Walters Form 1 of 5 2107_Redacted.pdf</a>
<b>Consultee Name</b>	Mrs Claire Walters
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Part 2
<b>Title</b>	The Places and Our Vision
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	Vision
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	The National Trust support the Local Plan's Vision, particularly the second bullet point (B) which recognises the crucial role of the Borough's open spaces, including its valued landscapes and coastline, in adapting to and mitigating against the effects of climate change whilst promoting local identity and distinctiveness and improving health and wellbeing. We are fully supportive of the commitment to increase tree cover by 50% compared to 2020 levels, deliver gains for biodiversity and become a net zero carbon Borough.
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	The National Trust support the Local Plan's Vision, particularly the second bullet point (B) which recognises the crucial role of the Borough's open spaces, including its valued landscapes and coastline, in adapting to and mitigating against the effects of climate change whilst promoting local identity and distinctiveness and improving health and wellbeing. We are fully supportive of the commitment to increase tree cover by 50% compared to 2020 levels, deliver gains for biodiversity and become a net zero carbon Borough.
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	



<b>omplies with the Duty to co-operate</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	The National Trust support the Local Plan's Vision, particularly the second bullet point (B) which recognises the crucial role of the Borough's open spaces, including its valued landscapes and coastline, in adapting to and mitigating against the effects of climate change whilst promoting local identity and distinctiveness and improving health and wellbeing. We are fully supportive of the commitment to increase tree cover by 50% compared to 2020 levels, deliver gains for biodiversity and become a net zero carbon Borough.
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	
<b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b>	

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

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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<b>Comment ID</b>	LPSD-389
<b>Person ID</b>	1269966
<b>Include files</b>	<a href="#">LPSD-389-EM-Walters Form 2 of 5 2107_Redacted.pdf</a>
<b>Consultee Name</b>	Mrs Claire Walters
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 1.1
<b>Title</b>	Homes
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 1.1
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	<p>The National Trust strongly supports the focus on urban regeneration to meet the borough's housing and development needs. Prioritising brownfield development and allocating sites within existing Settlement Areas reduces the need to release sites in less sustainable locations outside existing settlements, including land within the designated Green Belt. National planning policy is clear that land should only be taken out of the Green Belt in exceptional circumstances. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open.</p> <p>This approach also prevents the fragmentation of valuable green spaces with associated disruption to wildlife and recreational access.</p>
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	<p>The National Trust strongly supports the focus on urban regeneration to meet the borough's housing and development needs. Prioritising brownfield development and allocating sites within existing Settlement Areas reduces the need to release sites in less sustainable locations outside existing settlements, including land within the designated Green Belt. National planning policy is clear that land should only be taken out of the Green Belt in exceptional circumstances. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open.</p> <p>This approach also prevents the fragmentation of valuable green spaces with associated disruption to wildlife and recreational access.</p>
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	

<b>omplies with the Duty to co-operate</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	<p>The National Trust strongly supports the focus on urban regeneration to meet the borough's housing and development needs. Prioritising brownfield development and allocating sites within existing Settlement Areas reduces the need to release sites in less sustainable locations outside existing settlements, including land within the designated Green Belt. National planning policy is clear that land should only be taken out of the Green Belt in exceptional circumstances. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open.</p> <p>This approach also prevents the fragmentation of valuable green spaces with associated disruption to wildlife and recreational access.</p>
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	
<b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b>	

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

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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<b>Comment ID</b>	LPSD-390
<b>Person ID</b>	1269966
<b>Include files</b>	<a href="#">LPSD-390-EM-Walters Form 3 of 5 2107_Redacted.pdf</a>
<b>Consultee Name</b>	Mrs Claire Walters
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 5.1
<b>Title</b>	Green and Blue Infrastructure Networks
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 5.1
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	<p>The National Trust is fully committed to the establishment of high quality, coherent and resilient of blue and green infrastructure networks. A thriving and distinctive natural environment lies at the heart of sustainable development, providing opportunities for recreation and boosting our health and wellbeing, whilst mitigating the effects of climate change.</p> <p>Maintaining and enhancing the quality and integrity of existing assets is considered important in this regard and aligns with the advice contained in the National Planning Policy Framework. We support the approach outlined in Policy WS 5.1A and measures to protect and enhance the quality, accessibility and functionality of assets, although suggest the fifth bullet point is unnecessary if the second bullet is amended to refer to 'maintain and enhance....'.</p> <p>We are pleased to see the policy wording recognises that enhancing accessibility may not be feasible in fragile habitats and ecologically sensitive areas where greater recreational use would conflict with the conservation/management objectives for the site and could have a detrimental effect upon ecological integrity.</p>
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	<p>The National Trust is fully committed to the establishment of high quality, coherent and resilient of blue and green infrastructure networks. A thriving and distinctive natural environment lies at the heart of sustainable development, providing opportunities for recreation and boosting our health and wellbeing, whilst mitigating the effects of climate change.</p> <p>Maintaining and enhancing the quality and integrity of existing assets is considered important in this regard and aligns with the advice contained in the National Planning Policy Framework. We support the approach outlined in Policy WS 5.1A and measures to protect and enhance the quality, accessibility and functionality of assets, although suggest the fifth bullet point is unnecessary if the second bullet is amended to refer to 'maintain and enhance....'.</p> <p>We are pleased to see the policy wording recognises that enhancing accessibility may not be feasible in fragile habitats and ecologically sensitive areas where greater recreational use would conflict with the conservation/management objectives for the site and could have a detrimental effect upon ecological integrity.</p>
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
<b>Please give details of why you consider the Local Plan is</b>	

<b>unsound. Please be as precise as possible.</b>	
<b>omplies with the Duty to co-operate</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	<p>The National Trust is fully committed to the establishment of high quality, coherent and resilient of blue and green infrastructure networks. A thriving and distinctive natural environment lies at the heart of sustainable development, providing opportunities for recreation and boosting our health and wellbeing, whilst mitigating the effects of climate change.</p> <p>Maintaining and enhancing the quality and integrity of existing assets is considered important in this regard and aligns with the advice contained in the National Planning Policy Framework. We support the approach outlined in Policy WS 5.1A and measures to protect and enhance the quality, accessibility and functionality of assets, although suggest the fifth bullet point is unnecessary if the second bullet is amended to refer to 'maintain and enhance....'.</p> <p>We are pleased to see the policy wording recognises that enhancing accessibility may not be feasible in fragile habitats and ecologically sensitive areas where greater recreational use would conflict with the conservation/management objectives for the site and could have a detrimental effect upon ecological integrity.</p>
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	
<b>Please set out the modification(s) you consider necessary</b>	

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

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

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

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

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

<b>Comment ID</b>	LPSD-391
<b>Person ID</b>	1269966
<b>Include files</b>	<a href="#">LPSD-391-EM-Walters Form 4 of 5 2107_Redacted.pdf</a>
<b>Consultee Name</b>	Mrs Claire Walters
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 5.4
<b>Title</b>	Ecological Networks
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 5.4
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	The establishment of coherent and resilient ecological networks is strongly supported. Prioritising habitats in accordance with the strategies and areas outlined in the policy provides an appropriate framework in which to achieve this. The approach is consistent with the advice contained in the National Planning Policy Framework and takes a strategic approach to the maintenance and enhancement of networks of habitats and green infrastructure.
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	The establishment of coherent and resilient ecological networks is strongly supported. Prioritising habitats in accordance with the strategies and areas outlined in the policy provides an appropriate framework in which to achieve this. The approach is consistent with the advice contained in the National Planning Policy Framework and takes a strategic approach to the maintenance and enhancement of networks of habitats and green infrastructure.
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	

<b>omplies with the Duty to co-operate</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	The establishment of coherent and resilient ecological networks is strongly supported. Prioritising habitats in accordance with the strategies and areas outlined in the policy provides an appropriate framework in which to achieve this. The approach is consistent with the advice contained in the National Planning Policy Framework and takes a strategic approach to the maintenance and enhancement of networks of habitats and green infrastructure.
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	
<b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b>	



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

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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<b>Comment ID</b>	LPSD-392
<b>Person ID</b>	1269966
<b>Include files</b>	<a href="#">LPSD-392-EM-Walters Form 5 of 5 2107_Redacted.pdf</a>
<b>Consultee Name</b>	Mrs Claire Walters
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 5.8
<b>Title</b>	Landscape Character
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 5.8
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	<p>The National Trust supports the provisions of Policy WS5.8 and recognises that local landscape designations can play an important part in protecting and enhancing landscapes with special qualities.</p> <p>The National Trust cares for land within three of the five Areas of Special Landscape Value (ASLV) identified on the Proposals Map. Specifically, Thurstaston Common, Caldy Hill and land west of Heswall. These areas perform a vital role in providing opportunities for recreation, along with numerous other public benefits associated with access to nature, beautiful landscapes, panoramic views and sense of tranquillity.</p> <p>Policy WS5.8 is considered compliant with paragraph 174 of the National Planning Policy Framework which sets out that planning policies and decisions should contribute to and enhance the natural and local environment by inter alia protecting and enhancing valued landscapes and recognising the intrinsic character and beauty of the countryside.</p>
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	<p>The National Trust supports the provisions of Policy WS5.8 and recognises that local landscape designations can play an important part in protecting and enhancing landscapes with special qualities.</p> <p>The National Trust cares for land within three of the five Areas of Special Landscape Value (ASLV) identified on the Proposals Map. Specifically, Thurstaston Common, Caldy Hill and land west of Heswall. These areas perform a vital role in providing opportunities for recreation, along with numerous other public benefits associated with access to nature, beautiful landscapes, panoramic views and sense of tranquillity.</p> <p>Policy WS5.8 is considered compliant with paragraph 174 of the National Planning Policy Framework which sets out that planning policies and decisions should contribute to and enhance the natural and local environment by inter alia protecting and enhancing valued landscapes and recognising the intrinsic character and beauty of the countryside.</p>
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
<b>Please give details of why you consider the Local Plan is</b>	

<b>unsound. Please be as precise as possible.</b>	
<b>omplies with the Duty to co-operate</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	<p>The National Trust supports the provisions of Policy WS5.8 and recognises that local landscape designations can play an important part in protecting and enhancing landscapes with special qualities.</p> <p>The National Trust cares for land within three of the five Areas of Special Landscape Value (ASLV) identified on the Proposals Map. Specifically, Thurstaston Common, Caldý Hill and land west of Heswall. These areas perform a vital role in providing opportunities for recreation, along with numerous other public benefits associated with access to nature, beautiful landscapes, panoramic views and sense of tranquillity.</p> <p>Policy WS5.8 is considered compliant with paragraph 174 of the National Planning Policy Framework which sets out that planning policies and decisions should contribute to and enhance the natural and local environment by inter alia protecting and enhancing valued landscapes and recognising the intrinsic character and beauty of the countryside.</p>
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	
<b>Please set out the modification(s) you consider necessary</b>	

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

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

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

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

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

<b>Comment ID</b>	LPSD-393
<b>Person ID</b>	1266650
<b>Include files</b>	<a href="#">LPSD-393-EM-Hayward Form 2107_Redacted.pdf</a>
<b>Consultee Name</b>	Mrs Elaine Hayward
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 1.1
<b>Title</b>	Homes
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
<b>Please state which paragraph number(s) this representation relates to.</b>	2.8, 2.12, 3.15 WS1.1
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	



<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	<p>Prof David Gregg has submitted a report on the Housing Need figures. I wish to register my agreement with this document. I also want to add the following points:-</p> <p>Paragraph 2.8 figure 2.4 Key Stats Population predicts the population to rise to 332,700 from 324,500 (paragraph 2.1) based on the ONS projections for 2020. This predicts population growth of 8200.</p> <p>Paragraph 2.12 states that the population for the Borough is projected to increase by 2.5% over the period 2020 to 2037. This equates to 8112.</p> <p>Paragraph 3.15 states that the Borough is home to 144596 households and expected growth over the period is 6.1%. This equates to an extra 8820 households.</p> <p>Therefore the projected extra household figure is greater than the expected population increase. This does not make sense.</p>

	<p>The Borough of Wirral is a peninsular, surrounded on three sides by water. This makes the Borough geographically unique on mainland Britain. The standard method for housing need figures has been used, despite this being a major fact which should have been taken into consideration. Prof David Gregg's in depth report shows in great detail why the housing numbers should be considerably lower. Throughout the various consultation stages, Prof Gregg has provided evidence to show why the housing need figures are vastly inflated in this Plan, but they have been disregarded.</p>
<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you</b></p>	<p>The Housing Need figure needs to be reduced as per Prof David Gregg's representation for Wirral Green Space Alliance.</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.

**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**

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

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

<b>Comment ID</b>	LPSD-394
<b>Person ID</b>	1237944
<b>Include files</b>	<a href="#">LPSD-394-EM-Baker Form 1 of 8 2107_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Mark Baker
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Appendix 1
<b>Title</b>	Local Plan Glossary
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	Appendix 1 Table A1.1 Glossary
<b>Please state which Site ID/Reference this representation relates to.</b>	

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

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

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

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

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

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



<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	
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<b>Comment ID</b>	LPSD-395
<b>Person ID</b>	1237944
<b>Include files</b>	<a href="#">LPSD-395-EM-Baker Form 2 of 8 2107_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Mark Baker
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 4.1
<b>Title</b>	Meeting the Strategy
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 4.1
<b>Please state which Site ID/Reference this representation relates to.</b>	

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.	WS4.1 fails to meet soundness requirements by not considering the volatile nature of current working styles and failing to build into strategy the necessary flexibility to meet challenges going forward. WS4.1 item 8: Fails to meet soundness requirement by only facilitating, rather than encouraging, the training and upskilling of the workforce.

<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>	<p>Amend item 8 as follows:</p> <p>supporting local employment by ENCOURAGING the training and upskilling of the workforce.</p> <p>Add extra item 9</p> <p>Ensuring flexibility is built into the plan to accommodate the volatile nature of working style in the post pandemic environment.</p>

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

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

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

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

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	
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<b>Comment ID</b>	LPSD-396
<b>Person ID</b>	1237944
<b>Include files</b>	<a href="#">LPSD-396-EM-Baker Form 3 of 8 2107_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Mark Baker
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy RA 3
<b>Title</b>	Birkenhead Waterfront Regeneration Area
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	MPA-RA3.1

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



<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><i>Reword para C 4</i></p> <p>a shared use road network which ensures safe access for all users and provides safe pedestrian cyclist <b>and tramway routes</b> between Hamilton Square and the waterfront; and</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**

<b>Comment ID</b>	LPSD-397
<b>Person ID</b>	1237944
<b>Include files</b>	<a href="#">LPSD-397-EM-Baker Form 4 of 8 2107_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Mark Baker
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 2
<b>Title</b>	Social Value
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 2
<b>Please state which Site ID/Reference this representation relates to.</b>	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Policy WS2 overall fails to meet soundness requirements by failing to make provision for a skills audit of the local population. This would (a) inform potential employers of the labour resources available and encourage employment to the area and (b) inform local education and training policy where skill areas require further strengthening.

<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>	<p>Add new section to WS2: Carry out a skills audit of the local population for the purpose of (a) informing potential employers of the available skill set and (b) informing education and training policy where skill areas require further strengthening.</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**



<b>Comment ID</b>	LPSD-398
<b>Person ID</b>	1237944
<b>Include files</b>	<a href="#">LPSD-398-EM-Baker Form 5 of 8 2107_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Mark Baker
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 5
<b>Title</b>	Strategy for Green and Blue Infrastructure, Open Space, Biodiversity, and Landscape Protection
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 5
<b>Please state which Site ID/Reference this representation relates to.</b>	

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.	Appears to fail to meet soundness requirements by addressing only the protection of existing areas of biodiversity whilst ignoring the swathes of derelict and wasteland, for which no planning approval has been sought,that could be planted with vegetation (e.g. trees) in order to absorb CO2 and remove aerial pollution (e.g. open areas around Conway Park Merseyrail station)

<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>	<p>Add extra item to section A:Where possible require or encourage the greening of derelict wasteland and undeveloped brownfield sites to maximise the absorption of CO2 and aerial pollutants.</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**

<b>Comment ID</b>	LPSD-399
<b>Person ID</b>	1237944
<b>Include files</b>	<a href="#">LPSD-399-EM-Baker Form 6 of 8 2107_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Mark Baker
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 7.4
<b>Title</b>	Parking
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 7.4
<b>Please state which Site ID/Reference this representation relates to.</b>	

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.	Fails soundness test since it is based on pre-pandemic work practices and overlooks increased levels of working from home.

<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>	<p>Reword section F: Development proposals must provide well-designed, safe and appropriately supervised parking, including parking for disabled people, residents working from home and their visitors, and electric vehicle charging facilities, that incorporates appropriate landscaping and materials to reduce visual impact and not dominate the streetscene, in accordance with the parking standards at Appendix 8</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**

<b>Comment ID</b>	LPSD-400
<b>Person ID</b>	1237944
<b>Include files</b>	<a href="#">LPSD-400-EM-Baker Form 7 of 8 2107_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Mark Baker
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 8
<b>Title</b>	Strategy for Sustainable Construction, Renewable and Low Carbon Energy
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 8
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> *      Yes *      No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *      Yes *      No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> *      Not Positively Prepared *      Not Justified *      Not Effective *      Not Consistent with National Policy	Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	Whilst the plan addresses the requirements to upgrade the environmental performance of heritage assets(8.3) and new builds and refurbs (8.2), it appears to fail soundness requirements by failing to also address the environmental performance needs of all other existing property assets (e.g. Victorian/Edwardian terraces)

<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>	<p>Add new section: Provision should be made within the plan to encourage maximisation of energy efficiency in existing commercial and residential buildings</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**