

Comment ID	LPSD-401
Person ID	1237944
Include files	LPSD-401-EM-Baker Form 8 of 8 2107_Redacted.pdf
Consultee Name	Mr Mark Baker
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 11
Title	Strategy for town and local centres
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 11
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	The plan fails to address the need to support and encourage the efforts of existing local retailers in assuring a vibrant and sustainable retail environment

<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>Add Item 7:Create an environment which ensure the preservation and growth of existing retail trading communities while providing for new entrants</p>

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

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

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

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

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

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

Comment ID	LPSD-402
Person ID	1323667
Include files	
Consultee Name	Mrs Janet Ritchie
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WP 4.2
Title	Residential Sites
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	RES-SA4.1

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	No
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	We have a right of way access to our property via Civic Way, which has been in place for the last 26 years, has not been considered in the proposed plan.
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 Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>This representation has been edited to redact Special Category Data in line with Data Protection requirements. The current use of land is as a car park and previous use has been for commercial/employment purposes and not domestic purposes. The loss of wildlife and trees is also of great concern.</p> <p>We purchased this property The access caused an initial concern, as the access from Heath Road to the front door of our home has a series of steps (13 in total) which are not accessible for a wheelchair. However we were advised this would not be an issue as level access is available via Civic Way and gated access has been in place for the last 26 years. We have made use of this access dailyand without it this would be impossible.</p> <p>We would welcome conversations with the council in ensuring the most appropriate action is taken ... should the proposed local plan go ahead.</p>

omplies with the Duty to co-operate * Yes * No	No
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	We have not had any contact from the council with regards to the proposed local plan prior to submission
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of	[address level access to property which may be blocked with development of the site]

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-403
Person ID	1323671
Include files	
Consultee Name	MR DAVID WEBSTER
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 1.1
Title	Homes
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	3.15 Housing Need
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	The evidence base in H8 Wirral SHMA Update includes out of date and incomplete analysis and the standard methodology should not be relied on. The population at the 2021 census is lower than that stated at 2018 in the report. A 6% growth in households projected by the ONS is only an additional 8,884 households. This is significantly lower than the assumed housing need of 13,360 over the Plan period. There is no clear explanation of the drivers of population and housing growth. The housing need is materially overstated.

omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of	The housing need should be re-assessed to reflect the true drivers of population growth over the Plan period. Document H8 Wirral SHMA Update references a growth of 8,884 households over the plan period to 2037. Whole of life carbon assessments of new builds strongly indicate a preference towards refurbishment of existing properties rather than new build. The annual target should reduced from 13,360 homes to 9,000 homes with a greater focus on refurbishment and conversion of existing properties.

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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LPSD-404

Comment ID	LPSD-404
Person ID	1323669
Include files	LPSD-404,704,706,707-EM-Grimster Form 2207_Redacted.pdf LPSD-404,704,706,707-Grimster Attach 2107_Redacted.pdf
Consultee Name	Mr Ray Burgan
Position	
Company / Organisation	
Agent ID	1248451
Agent Name	Mr Steve Grimster
Position	Director
Company / Organisation	Grimster Planning
Number	
Title	Vision
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	2.38 - Vision
Please state which Policy Number this representation relates to.	

Please state which Site ID/Reference this representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is	As drafted, our Client is concerned that the Local Plan Vision is overly focused on the regeneration and growth of Birkenhead, Wirral Waters, New Ferry and Liscard. Accordingly, whilst our Client supports some elements of the Local Plan Vision, they object to the fact that, based on the Council's strategic approach, almost half of the Borough will play little to no role in facilitating and benefiting from economic investment in the Borough. This does not constitute a sustainable development and spatial strategy for growth.

unsound. Please be as precise as possible.	
omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	N/A
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	N/A
Please set out the modification(s) you consider necessary	Instead, there remains a clear need to pursue a balanced development and spatial strategy across the whole of Wirral up to 2037, including the sustainable release of greenfield land in the Green Belt to meet local housing needs (C2 and C3).

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

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

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

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

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

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

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

LPSP-405

Comment ID	LPSP-405
Person ID	1323679
Include files	LPSP-405-EM-Storey Form 2207_Redacted.pdf LPSP-405, 945, 952-955 & 1402-1403-EM-Storey Attach 2207_Redacted
Consultee Name	Ms Eleanor Ogilvie
Position	
Company / Organisation	MCI Development
Agent ID	1248751
Agent Name	Mr Jonathan Storey
Position	Senior Planner
Company / Organisation	Pegasus Group
Number	Policy WS 1
Title	The Development and Regeneration Strategy for Wirral 2021 - 2037
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1.1,

Please state which Site ID/Reference this representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is	Please refer to attachment. The Council have not provided any evidence to justify the quantity of development that can be delivered in Regeneration Areas along with associated infrastructure within the Plan period. The delivery strategy does not take a realistic view on the economic viability issues that are present on the majority of allocated sites. Insufficient evidence has been supplied to prove the

unsound. Please be as precise as possible.	viability of these major regeneration sites be it through grant funding or otherwise. If found to be unsound, further consideration would need to be given to housing growth on viable and deliverable sites on other brownfield land sites which are available. Please find attached Regulation 19 response on behalf of MCI outlining how we feel the plan being 'unsound'. The Council have not provided sufficient evidence on the delivery of major housing allocations within Regeneration Areas to provide the quantity of homes needed. If found to be unsound, alternative sites need to be assessed for new residential development including vacant and underutilised employment land.
omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	N/A
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	N/A
Please set out the modification(s) you	Please find attached REgulation 19 response on behalf of MCI outlining the main modifications we consider necessary

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)

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

<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>For the reasons outlined in the attached MCI Developments find that the current plan is unsound. A large portion of this relates to the weakness in the council's evidence base which have formulated the policies that are considered to be 'unsound'. Our previous representation to consultations have not been implemented. As such, we request that we are involved in any discussions relating to the identified policies and strategies.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

Comment ID	LPSD-406
Person ID	1248823
Include files	LPSD-406-EM-Storey Form 2207_Redacted.pdf
Consultee Name	Mr Ian Mellor
Position	
Company / Organisation	North Point One LLP
Agent ID	1248751
Agent Name	Mr Jonathan Storey
Position	Senior Planner
Company / Organisation	Pegasus Group
Number	Policy WS 1.1
Title	Homes
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	Vision (H), WS 1.1,
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please find attached Regulation 19 response on behalf of North Point One LLP outlining how we feel the plan being 'unsound'. The Council have not provided any evidence to justify the quantity of development that can be delivered in Regeneration Areas along with associated infrastructure within the Plan period. The delivery strategy does not take a realistic view on the economic viability issues that are present on the majority of allocated sites. Insufficient evidence has been supplied to prove the viability of these major regeneration sites be it through grant funding or otherwise. If found to be unsound, further consideration would need to be given to housing growth on viable and deliverable sites elsewhere in the Borough. This would act as an exceptional circumstance to justify Green Belt land release.

as precise as possible.	<p>The Council have not provided any evidence to justify the small-scale incremental development envisioned within the towns and villages of the west of Wirral and that they will remain stable and thrive over the plan period, and thus that the Vision is sound.</p> <p>If found to be unsound, further consideration would need to be given to how the towns and villages of the west of Wirral can thrive over the plan period. This could include, for example, going beyond the envisaged small-scale incremental development in a way which is aspirational but deliverable to address the issues faced by these towns and villages over the plan period.</p>
omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	N/A
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	N/A

<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Please find attached Regulation 19 response on behalf of North Point One LLP outlining the main modifications we consider necessary</p> <p>Release Green belt sites</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>For the reasons outlined in the attached North Point One LLP find that the current plan is unsound. A large portion of this relates to the weakness in the Council's evidence base which have formulated the policies that are considered to be 'unsound'. Our previous representation to consultations have not been implemented. As such, we request that we are involved in any discussions relating to the identified policies and strategies.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

Comment ID	LPSD-407
Person ID	1241495
Include files	
Consultee Name	Mrs Lesley Brockbank
Position	Wirral Coordinator
Company / Organisation	Wirral & Cheshire Badger Group
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 5.2
Title	Open Space Provision
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	3.118
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

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

omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of	To read - "that all new housing developments should contribute towards the overall provision of high quality natural open space with potential to contribute to BNG and ecological networks. "

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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LPSD-408

Comment ID	LPSD-408
Person ID	1323689
Include files	LPSD-408, 856, 866, 881-EM-O'Connor Attach 2 of 8 2207_Redacted.pdf LPSD-408, 860, 866, 868,870 and 881-O'Connor Attach 7 of 8 2207_Redacted.pdf LPSD-408 and 873-EM-O'Connor Attach 5 of 8 2207_Redacted.pdf LPSD-408, 860, 866, 868, 870 and 881-EM-O'Connor Attach 8 of 8 2207_Redacted.pdf LPSD-408, 865, 873-EM-O'Connor Attach 3 of 8 2207_Redacted.pdf LPSD-408, 870, 876-EM-O'Connor Attach 4 of 8 2207_Redacted.pdf LPSD-408, 856, 860, 866, 868, 870, 873, 874, 876, 877, 881-EM-O'Connor Attach 1 of 8 2207_Redact.pdf
Consultee Name	Development Consortium in Wirral
Position	
Company / Organisation	
Agent ID	1248491
Agent Name	Brian O'Connor
Position	
Company / Organisation	Lichfields
Number	Policy WS 1
Title	The Development and Regeneration Strategy for Wirral 2021 - 2037
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Sustainability Appraisal
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this	

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

<p>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</p>	<p>Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base.</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	<p>Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base.</p> <p>NB the Soundness Representations (Attachment 1 notes at 9.5)"We note that the Council has rejected assessing higher levels of housing growth as a reasonable alternative in the SA, despite pursuing a housing figure slightly in excess of LHN to support economic growth. To reject this alternative, the Council relies heavily on a University of Liverpool document entitled: Review of consultation submission regarding H6. The document was not initially published for consultation by the Council but was provided for review upon request. We explored the soundness of this approach under Policy WS 1.1 (Section 2.0).</p> <p>9.6 The Consortium is receiving ongoing legal advice from Leading Counsel and reserves the right to comment on future versions of the SA leading into the Examination"</p>
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	

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

<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>We have prepared detailed evidence on behalf of the Consortium in relation to the Wirral Local Plan and its evidence base. This evidence demonstrates that the plan is fundamentally unsound.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

LPSP-409

Comment ID	LPSP-409
Person ID	1323696
Include files	LPSP-409-EM-Fryer Form 1 of 9 2207_Redacted.pdf LPSP-409, 414, 417, 419-424-EM-Fryer Attach 1 of 3 2207_Redacted.pdf LPSP-409, 414, 417, 419-424-EM-Fryer Attach 2 of 3 2207_Redacted.pdf LPSP-409, 414, 417, 419-424-EM-Fryer Attach 3 of 3 2207_Redacted.pdf
Consultee Name	Ms Hannah Richins
Position	
Company / Organisation	Story Homes
Agent ID	1323694
Agent Name	Ms Jenny Fryer
Position	
Company / Organisation	Pinnacle Planning
Number	Policy WS 5.4
Title	Ecological Networks
To which part of the Local Plan does this representation relate?	Policy
* Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat Regulations Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this	WS 5.4

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

<p>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</p>	<p>Please refer to Attachment 1 and Consortium representation (LPSP-419 attachments 2 and 3)</p> <p>1.1 Policy WS 5.4 includes reference at section 'M' to developments being required to achieve a 10% biodiversity net gain when calculated using the DEFRA metric. The Policy further stipulates that 20% biodiversity net gain is required where development is proposed on Council owned land.</p> <p>1.2 Story Homes doesn't object to the provision of 20% biodiversity net gain on Council owned sites in principle but queries whether this can realistically be achieved. Many of the residential sites within the WLP already have considerable viability issues given their brownfield nature, insufficient amenities and services and the location within Regeneration Areas that are unproven housing markets. Requiring the provision of 20% biodiversity net gain on these brownfield sites, that are also required to meet minimum density thresholds, is likely to be unachievable, and adds a further layer of complexity and challenge to delivering the much needed new housing in the Borough.</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	<p>Yes</p>
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations</p>	

<p>Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Story Homes does not propose any modifications to Policy WS 5.4 however consider further evidence is required by the Council to demonstrate sufficient deliverable and developable residential sites have been identified that can viably meet the requirements of Policy WS5.4.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in</p>	<p>No, I do not wish to participate in hearing session(s)</p>

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

Comment ID	LPSD-410
Person ID	1238394
Include files	
Consultee Name	Dr Trevor Gauntlett
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Part 3
Title	Strategic Policies
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	All
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	The "Left Bank" proposal is coherent addressing the genuine needs of the borough's residents: regeneration in the urban areas and protection of green land in the suburban and rural areas.
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	

omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of	I endorse this plan. Let's get on with delivering regeneration in (urban) areas of the borough that need it and protect green spaces and blue areas throughout the borough

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-411
Person ID	1323700
Include files	
Consultee Name	Mr Thomas Hutchinson
Position	Management Group representative
Company / Organisation	Hoylake Vision Community Planning Forum
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Part 3
Title	Strategic Policies
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	Paragraph 3.6
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	The framework for the comprehensive regeneration of Birkenhead as a low carbon sustainable waterfront garden city based on the findings of the Draft Birkenhead 2040 Framework is supported. Support complementary regeneration policies for other 'LeftBank' places including New Brighton, Liscard and New Ferry. This is essential to make good use of previously developed urban land and avoid Green Belt release.
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	

omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of	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>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>Hoylake Vision Community Planning Forum is an active Neighbourhood Planning qualifying body that has prepared the Hoylake Neighbourhood Development Plan and is currently reviewing it. It can provide a valuable perspective on Local Plan matters and wishes to engage positively with the examination.</p>

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-412
Person ID	1323700
Include files	
Consultee Name	Mr Thomas Hutchinson
Position	Management Group representative
Company / Organisation	Hoylake Vision Community Planning Forum
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Part 3
Title	Strategic Policies
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	Paragraph 3.14
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	The key diagram P51 is supported, which shows regeneration and broad locations of housing areas to the north east of the Borough, with regeneration of Birkenhead and wider regeneration programme for the 'LeftBank' of the River Mersey stretching from New Brighton to Bromborough. This focus on urban brownfield land opportunities will enable housing and employment needs to be met without Green Belt release.
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	

omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of	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>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>Hoylake Vision Community Planning Forum is an active Neighbourhood Planning qualifying body that has prepared the Hoylake Neighbourhood Development Plan and is currently reviewing it. It can provide a valuable perspective on Local Plan matters and wishes to engage positively with the examination.</p>

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-413
Person ID	1323700
Include files	
Consultee Name	Mr Thomas Hutchinson
Position	Management Group representative
Company / Organisation	Hoylake Vision Community Planning Forum
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 1
Title	The Development and Regeneration Strategy for Wirral 2021 - 2037
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	The overall distribution of housing and employment is supported as it focuses on urban brownfield land with a bold, transformational approach to tackle current negative perceptions of the area. This is essential to make the best use of previously developed urban land and avoid Green Belt release.
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	

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

<p>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>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>Hoylake Vision Community Planning Forum is an active Neighbourhood Planning qualifying body that has prepared the Hoylake Neighbourhood Development Plan and is currently reviewing it. It can provide a valuable perspective on Local Plan matters and wishes to engage positively with the examination.</p>

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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LPSP-414

Comment ID	LPSP-414
Person ID	1323696
Include files	LPSP-409, 414, 417, 419-424-EM-Fryer Attach 3 of 3 2207_Redacted.pdf LPSP-409, 414, 417, 419-424-EM-Fryer Attach 2 of 3 2207_Redacted.pdf LPSP-409, 414, 417, 419-424-EM-Fryer Attach 1 of 3 2207_Redacted.pdf LPSP-414-EM-Fryer Form 2 of 9 2207_Redacted.pdf
Consultee Name	Ms Hannah Richins
Position	
Company / Organisation	Story Homes
Agent ID	1323694
Agent Name	Ms Jenny Fryer
Position	
Company / Organisation	Pinnacle Planning
Number	Part 2
Title	The Places and Our Vision
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat Regulations Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	Vision / Para 2.38
Please state which Policy Number this	

representation relates to.	
Please state which Site ID/Reference this representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	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

<p>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</p>	<p>Please refer to Attachment 1 and Consortium representation (LPSP-419 attachments 2 and 3)</p> <p>1.1 The thirteen point Local Plan Vision 2037 is set out in Part 2 of the WLP, titled 'the Places and Our Vision'.</p> <p>1.2 Story Homes agrees in principle to the content and topics covered within the Vision. However, as expanded on later in this chapter, the housing and regeneration strategy focusses too heavily on development at Birkenhead and Wirral Waters and fails to plan for growth that will adequately meet local housing needs, both in full and spatially across the whole Borough.</p> <p>1.3 Paragraph 11a of the NPPF is clear that plans should "positively seek opportunities to meet the development needs of their area" and that "strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas".</p> <p>1.4 Paragraph 60 also establishes the Government's objective of significantly boosting the supply of housing, as well as requiring that a sufficient amount and variety of land is to come forward where it is needed and that meets the needs of groups with specific housing requirements. Since 2018, the Government has identified an intention of reaching 300,000 net additional homes each year across the UK.</p> <p>1.5 In respect of meeting future housing needs in Wirral, the WLP Vision, criteria 'L' states, inter alia:</p> <p>"...The thousands of new homes delivered and retrofitted in Birkenhead and across the Borough... have assisted in narrowing the gap between the economically poorest and wealthiest residents. These homes meet the range of the housing needs of the Borough including affordable and specialist housing as well as market housing for a wide range of types of family."</p> <p>1.6 It is assumed that within this context, 'meet the range of the housing needs' refers not only to the type of housing but also to meeting Wirral's overall housing requirement during the plan period, in line with the latest available evidence, although this is not explicit. Story Homes is therefore of the view that the 'vision' should be altered to specifically acknowledge the need to meet the development needs in full, including for housing.</p> <p>1.7 Story do not consider that the WLP, or its evidence base, identifies sufficient land to meet local housing needs. The strategy is therefore not justified or effective and is therefore unsound in its current format, contrary to Paragraph 35 of the NPPF.</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	<p>Yes</p>
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	

<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Story Homes is of the view that the 'Vision' should be altered to specifically acknowledge the need to meet the development needs in full, including for housing.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to</p>	<p>Yes, I wish to participate in hearing session(s)</p>

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

Comment ID	LPSD-416
Person ID	1323700
Include files	
Consultee Name	Mr Thomas Hutchinson
Position	Management Group representative
Company / Organisation	Hoylake Vision Community Planning Forum
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 4.4
Title	Tourism
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 4.4
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>Part 3 of the plan lacks a strategic policy for built heritage. There are single criteria in WS 1.2 (Employment) and WS 6 (Placemaking for Wirral) but it is mostly treated as detailed policy (WD 2) in Part 6. Therefore Policy WS 4.4 should be enhanced to provide a stronger strategic framework for built heritage in the same way that Policy WS 5 provides a strategic policy for each element of green infrastructure such as ecology, geology and landscape.</p> <p>The problems appears to stem from an inadequate evidence base which has two aspects. Firstly the Conservation Area Appraisals are mostly out-of-date and many lack Management Plans. Secondly, unlike with all the green infrastructure elements there is no expert analysis set out in an up-to-date commissioned technical report. In fact, the Wirral Heritage Strategy https://democracy.wirral.gov.uk/ielssueDetails.aspx?Id=16967&PlanId=0&Opt=3#A115178 has been dropped from the evidence base after the Issues and Options Report and no replacement prepared.</p>

In the Issues and Options Report, with regard to heritage, under the heading 'What Our Evidence Tells Us' it stated:

8.114 Wirral's Heritage Strategy will set priorities for capital investment in heritage and heritage assets, to maximise educational, recreational, tourism and regeneration opportunities.

8.116 Flaybrick Cemetery and Port Sunlight have conservation area management plans dated 2018. Other conservation area appraisals and management plans date from 2007 and will need to be updated. New management plans will also need to be prepared for: Clifton Park, Hamilton Square, Lower Bebington, Meols Drive, Mountwood, the Kings Gap and the Magazines.

8.117 A wide variety of historic assets are undesignated can make an important contribution to Wirral's broader historic character. These features range widely in scope and in scale. Liverpool Museum considers undesignated historic assets to include "the vast majority of non-Scheduled archaeological remains, historic landscapes, buildings of local interest, artwork."

Our Preferred Approach

The Local Plan will set a positive strategy for the conservation and enjoyment of the Borough's heritage assets through the vision, objectives, broad spatial strategy, strategic priorities for settlement areas and policies for:

Achieving Sustainable Places;

Protection of Heritage Assets;

Each designated Conservation Area

This Issues & Options wording has unfortunately not found its way into the strategic policies of the Plan. As such, the resulting Plan does not reflect the advice in 'Historic Environment in Local Plans - Historic Environment Good Practice Advice in Planning: 1' (2015) which states sustainably managing the historic environment is best achieved by identifying clear strategic policies for heritage, in order to assist those preparing neighbourhood plans (para 14).

In terms of national policy for heritage, the NPPF sets out the need for Local Plans to be based on good evidence and strategic policies. Local Plans need to:

- be based on adequate, up-to-date and relevant evidence about their area (NPPF, Paragraph 31)
- contain strategic policies to make provision for the conservation and enhancement of the built and historic environment (NPPF, Paragraph 20)
- set out a positive strategy for the conservation and enjoyment of the historic environment, taking account of the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring and opportunities to draw on the contribution made by the historic environment to the character of a place (NPPF, Paragraph 190)

NPPG states that a plan's vision and objectives can be used to set out the types of place(s) which the plan aims to achieve, how this will contribute to the sustainable development of the area and how this translates into the expectations for development and investment, including design. Where a plan contains strategic policies, they can be used to set out these design expectations at a broad level – for example in relation to the future character and role of town centres, areas requiring regeneration or suburban areas facing more incremental change. Strategic policies can also be used to set key design requirements for strategic site allocations and explain how future masterplanning and design work is expected to be taken forward for these sites (NPPG, Paragraph: 003 Reference ID: 26-003-20191001).

WORDING OF POLICY 4.4

The wording of this policy is very confusing.

The designation of Urban Tourism Areas (listed in Appendix 7) is supported in principle. In particular TLR-SA6.1 (Hoylake and Meols Waterfront). However, these are essentially linear movement corridors with little space for new development. Clause I is written as a permissive policy for all development and the use of the word 'adjacent' is imprecise.

Clause K encourages tourist development in urban coastal locations including Hoylake, which is supported in principle but the wording 'in the urban area outside the Primarily Residential Areas shown on the Policies Map' excludes almost all of the town. This should be rewritten and much greater clarity on where hotels and guest houses are expected to locate.

Paragraph 3.107 attempts to clarify what Clause K means but this isn't clear either. 'Clause K. of Policy WS 4.4 does not preclude the development of hotels and guest houses providing overnight accommodation, without facilities for non-resident in any suitable location including in Primarily Residential Areas'.

The view of the Forum is that visitor accommodation may be appropriate in Primarily Residential Areas and it should not have to all go into a Centre. The made and emerging NP is flexible on visitor accommodation.

Hoylake Vision's local engagement exercises over the past two years found that there was concern about the promenade itself being commercialised as it was valued for its quiet, natural character and appreciation of its wildlife. However, many respondents did express a need for a place for toilets and refreshments, in addition to those in Hoylake Parade Community Centre. There was a broad consensus on developing activities along the promenade, such as events and sports.

Paragraph 5.45 of plan recognises how Hoylake functions as a coastal resort and Paragraph 5.49 recognises that the facilities and open spaces associated with North Wirral Coastal Park and the coastal promenades at Hoylake and Meols, the Hilbre Islands, Red Rocks Nature Reserve, West Kirby Promenade and Marine Lake and the Wirral Way, are of strategic importance. However this does not translate into useful policies to accommodate sustainable tourism so as to boost the social and economic vitality of Hoylake.

In the Issues and Options Report, with regard to tourism and the visitor economy, there is much more in the way of strategic policies recognising the importance of sustainable tourism and commitments to targeted investment along the coastal communities.

	<p>6.59 Wirral has made significant progress in developing its visitor offer over the last 10 years. Wirral has built its reputation on quality and distinctiveness, receiving a wide range of awards for its beaches, green flag parks as well as its heritage and attractions. Wirral is part of England's Golf Coast, home to 14 golf courses including Royal Liverpool, host of The Open in 2006 and 2014....</p> <p>6.60 The Wirral Visitor Economy Strategy 2017-2020 identifies a number of key priorities:</p> <ul style="list-style-type: none"> • Developing Wirral's tourism marketing strategy and positioning the peninsula as an outstanding destination; • Generating greater benefit from conferences, business meetings and events; • Developing Wirral's tourism assets and experiences to increase competitiveness • and attract new visitor markets; and • Encouraging sustainable and accessible tourism in Wirral. <p>6.62...In Wirral, a growth in sustainable tourism will be focused on the quality of the Borough's natural environment; built heritage; country parks; and coastline, with appropriate visitor facilities at Birkenhead, New Brighton, Leasowe, Hoylake, West Kirby, Thurstaston and along the Mersey coast, managed to avoid harm to European Sites and their supporting habitat.</p> <p>6.63 Tourism investment will be targeted to support regeneration in Birkenhead; provide improvements within the coastal resorts of New Brighton, Hoylake and West Kirby and along the Mersey coastline; and to improve public access to the coast and countryside subject to the protection of European Sites and their supporting habitats.</p> <p>Our Preferred Approach</p> <p>A growth in sustainable tourism will be focused on the quality of the Borough's natural environment; built heritage; country parks; and coastline, with appropriate visitor facilities at Birkenhead, New Brighton, Leasowe, Hoylake, West Kirby, Thurstaston and along the Mersey coast, managed to avoid harm to European Sites and their supporting habitat.</p> <p>Tourism investment will be targeted to support regeneration in Birkenhead; provide improvements within the coastal resorts of New Brighton, Hoylake and West Kirby and along the Mersey coastline (supported by the preparation of masterplans where appropriate); and to improve public access to the coast and countryside subject to the protection of European Sites and their supporting habitats</p>
<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying	

Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of 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>Our Preferred Approach A growth in sustainable tourism will be focused on the quality of the Borough's natural environment; built heritage; country parks; and coastline, with appropriate visitor facilities at Birkenhead, New Brighton, Leasowe, Hoylake, West Kirby, Thurstaston and along the Mersey coast, managed to avoid harm to European Sites and their supporting habitat.</p> <p>Tourism investment will be targeted to support regeneration in Birkenhead; provide improvements within the coastal resorts of New Brighton, Hoylake and West Kirby and along the Mersey coastline (supported by the preparation of masterplans where appropriate); and to improve public access to the coast and countryside subject to the protection of European Sites and their supporting habitats</p> <p>The policy and supporting text needs to be completely rewritten to reflect the concerns above, using the wording from the Issues & Options report on how heritage and tourism are of strategic significance to Wirral.</p>

<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>Hoylake Vision Community Planning Forum is an active Neighbourhood Planning qualifying body that has prepared the Hoylake Neighbourhood Development Plan and is currently reviewing it. It can provide a valuable perspective on Local Plan matters and wishes to engage positively with the examination.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

LPSP-417

Comment ID	LPSP-417
Person ID	1323696
Include files	LPSP-417-EM-Fryer Form 3 of 9 2207_Redacted.pdf LPSP-409, 414, 417, 419-424-EM-Fryer Attach 1 of 3 2207_Redacted.pdf LPSP-409, 414, 417, 419-424-EM-Fryer Attach 2 of 3 2207_Redacted.pdf LPSP-409, 414, 417, 419-424-EM-Fryer Attach 3 of 3 2207_Redacted.pdf
Consultee Name	Ms Hannah Richins
Position	
Company / Organisation	Story Homes
Agent ID	1323694
Agent Name	Ms Jenny Fryer
Position	
Company / Organisation	Pinnacle Planning
Number	Policy WP 4.2
Title	Residential Sites
To which part of the Local Plan does this representation relate?	Policy
* Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat Regulations Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this	WP 4.2

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

Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.

Please refer to Attachment 1 and Consortium representation (LPSP-419 attachments 2 and 3). See LPSP-419 Attachment 2 for Development Statement for Land South of Brimstage Road.

1.1 This Policy identifies seven residential sites in the Bebington, Bromborough and Eastham Settlement Area. The sites range in size from 15 dwellings up to 1,225, with WBC estimating the total capacity to be 1,870.

1.2 Lichfield's undertook site appraisals of key strategic sites in Wirral's supply and provided extensive dialogue on the deliverability of each – addressing matters such as timescale for delivery (Land at Civic Way, Bebington [RES-SA4.1]), active use [Riverside Office Park, Bromborough [RES-SA4.3/MPA-SA4.2]) and landownership constraints (Unilever Research, Bebington [RES-SA4.11]). Chapter 9 of Lichfields' Technical Paper 4 (provided as an Appendix to our written representation) includes an assessment of significant number of sites including several in the Bebington, Bromborough and Eastham Settlement Area. The assessment challenges the availability and suitability of the sites and estimates an alternative capacity and time frame for delivery. The table below shows the difference between the estimations made by Wirral and Lichfields.(please refer to attached form)

Table 1.3: Comparison of Site Capacity and Delivery Timescales

Site Ref	Wirral Council Consortium	Capacity Contribution	Capacity Contribution to 5YHLS	5YHLS
SA4.1	60	60	60	0
SA4.2	250	80	0	0
SA4.3	200	80	0	0
SA4.5	15	15	15	0
SA4.7	1,225	125	300	0
SA4.11	120	120	120	0
Total	1,870	480	495	0

1.3 Lichfields' assessment reduces the Settlement Area's residential site capacity by 1,375 dwellings over the plan period, cutting it to just 495, and removes 480 dwellings from the WBC's claimed 5 year housing land supply.

1.4 Technical Paper 4 includes an assessment of other residential allocations in different Settlement Areas and concludes that of the 2,620 dwellings claimed by WBC, Lichfields consider only 1,214 are considered deliverable. Furthermore, the Technical Paper 4 challenges the Settlement Area allocations included in the Council's claimed 5 year housing land supply. The Council claim 1,179 dwellings will be built in Settlement Areas over the first five years of the plan period whereas Lichfields' assessment of deliverability suggests this figure is as low as just 332 dwellings.

1.5 Technical Paper 4 also casts significant doubt over the deliverability of the Council's wider claimed supply of residential sites, including the Regeneration Areas. Of the claimed supply of 8,874 dwellings within these areas, Lichfields consider only 3,772 to be deliverable. Coupled with the identified deficiencies with the strategic residential policies and the flawed expectations in respect of housing types and affordable housing provision, specifically in the Birkenhead Regeneration Areas, the WLP is clearly failing to plan to meet the needs of existing and future residents.

1.6 The Council must allocate more residential sites in the WLP, to meet the identified housing needs (family housing, affordable housing, housing for the elderly). Additional allocations need to be greenfield sites with fewer viability constraints and with a lower minimum density expectation.

1.7 Should the Council remove land south of Brimstage Road from the Green Belt, the site can be developed in the first 5 years of the plan period and will contribute significantly to the quality and quantity of available housing needed across the Borough.

Green Belt Review (2019)

1.8 Arup prepared the GBR on behalf of Wirral Council as an evidence base to support the earlier stages of the WLP. The GBR breaks down the Wirral Green Belt into 9 General Areas (GA's). Conclusions are reached through an assessment process on whether each GA and then each Green Belt Parcel ('Parcel') within a GA makes a 'weak', 'moderate' or 'strong' contribution to the purposes of including land in the Green Belt. Essentially a two tier approach to assessment.

1.9 Arup's assessment includes reference to the five purposes of including land in the Green Belt as stipulated at Paragraph 134 of the NPPF:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and

	<p>e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'.</p> <p>1.10 Story Homes submitted a representation to the Regulation 18 consultation which appraised the methodology adopted by Arup in preparing the GBR. The appraisal found that the methodology is inconsistent with national advice on how to undertake robust Green Belt assessments and is inconsistent with the approach that neighbouring authorities have taken to their Green Belt assessments (response to Question 2.16). Arup's GBR departed from the national advice note endorsed by the Local Government Association and Planning Advisory Service which sets out guidance on how local authorities should approach the review of Green Belts in respect of Green Belt purpose five. All GA's and Parcels were considered to make an equal and 'moderate' contribution to the fifth purpose.</p> <p>1.11 As a result, Parcels and GA's are considered to have an overall greater contribution to the purpose of the Green Belt.</p> <p>1.12 The Story Homes site, land south of Brimstage Road is within GA7 and Parcel 4.6; both of which would have been found to make a 'weak' overall contribution to the Green Belt if the GBR adopted methodologies from the good practice examples or from neighbouring authorities such as St Helens. Story Homes therefore ask that WBC revisit and amend the GBR to align with the good practice examples when looking to allocate greenfield residential sites. Parcel 4.6 will be found to make a 'weak' contribution to the Green Belt and its removal from the Green Belt will be supported by Story Homes. Story Homes does not agree with WBC's judgement that exceptional circumstances do not exist to release the site from the Green Belt.</p> <p>1.13 Paragraph 140 of the NPPF confirms, "Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans."</p> <p>1.14 Exceptional circumstances for the removal of land from the Green Belt are evidenced and justified to help meet qualitative and quantitative housing need across the Borough. The sections above on strategic policies demonstrate that even the suppressed housing requirement is incapable of being met within the urban area. Hurdles to the delivery of housing across the Borough are created by focussing all residential development to brownfield sites, stipulating minimum bedroom numbers and applying a minimum density figure to an already challenging housing market area. To ensure the needs of existing and future residents are met WBC must revisit the GBR and allocate more greenfield sites.</p> <p>1.15 The Regulation 18 consultation included questions on the location of Green Belt release if it was considered to be necessary. Option 2A comprised a dispersed approach to releasing sites from the Green Belt and Option 2B was to release sites in one location.</p> <p>1.16 Story Homes object to Option 2B as the benefits of Option 2A significantly outweigh those for 2B. The benefits include the provision of a flexible supply of sites in a range of locations that will support infrastructure growth and delivery of key services across the Borough.</p> <p>1.17 Story Homes support in principle a dispersed approach to Green Belt release however the flaw with the site selection methodology, as outlined above, prematurely discounts suitable sites. Wirral is not a suitable Borough for the release of Green Belt sites in one location.</p>
complies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
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<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of 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</p>	<p>1.1 As a result of Lichfields' site assessment work the Council must revisit the claimed supply in the Bebington and Bromborough area and ensure that a deliverable and developable supply of residential sites is identified.</p> <p>1.2 Story Homes has promoted land south of Brimstage Road, Bebington for a number of years through the earlier consultation stages. Story Homes is committed to delivering this site to a high standard and in line with the draft Development Management Policies should the site be allocated. Story commit to delivering a net gain in biodiversity across the site, to delivering a mix of market and affordable housing in line with identified local needs and incorporating green and blue infrastructure to the proposals. Energy efficiency is also a key priority for Story Homes and will be incorporated into both the layout design and to the fabric first approach to construction.</p> <p>Site and Surroundings</p> <p>1.3 The Site is comprised of a parcel of land to the south of Brimstage Road. The parcel is triangular in shape and consists of circa 11 hectares of undeveloped farmland. The parcel adjoins the urban area of Bebington/Moss Hey and is enclosed by the M53 Motorway to the west; Brimstage Road to the north; residential area of Moss Hey to the east and Old Clatterbridge Road to the south.</p> <p>1.4 The site is divided into several parcels by hedgerows, the majority of which are well established with historic field boundaries. The site slopes gradually from the north east to the west and sits above the M53 motorway.</p> <p>1.5 There are ponds present within the site which are also surrounded by trees. The site boundaries with Brimstage Road and Old Clatterbridge Road are characterised by native mixed hedgerows, whilst the boundary with the M53 is marked by a post and rail fence. Footways are available on both Brimstage</p> <p>Services and Amenities</p> <p>1.6 Many Local amenities are situated within a short walk of the Site and provide day-to-day services and facilities for a new local community. As recommended by the Chartered Institute of Highways and Transportation (CIHT) guidance, several schools are within walking distance of the Site. Walking trips by school children to the Stanton Road Primary School and Poulton Lancelyn Primary are achievable (within 1 km and 1.5km respectively) and can be reached by safe walking routes. Other key nearby services with a 2km walking distance include GPs, pharmacies, different types and sizes of retail units and libraries. The locations of the various social infrastructure facilities are shown in the Sustainability map.</p> <p>1.7 The town is well focused for future residential development given its strategic location, 5 and 12 miles respectively, from the employment and cultural centres of Liverpool City Centre and Chester City Centre. Locally, Bebington also offers a range of employment opportunities at the nearby Port Sunlight and Ellesmere Port, 2 and 10 miles away respectively. These are important large employment hubs providing numerous jobs for residents, which support the sustainability aspirations of the WLP.</p> <p>1.8 Bebington also has excellent local and strategic connectivity with a wide choice of local, regional and national rail, bus and road links easily accessible from the town and Land South of Brimstage Road.</p> <p>Many local amenities are situated within a short walk of the Site and would provide day-to-day services</p> <p>1.9 An allocation for residential use on Land South of Brimstage Road, where there is a willing landowner and a quality developer legally committed, means that the Site is available and deliverable. The Site can deliver approximately 320 new family dwellings connected to the existing community and facilities at Bebington.</p> <p>Suitability</p>

or text. Please be as precise as possible.

1.10 Bebington has existing physical infrastructure in place to allow new developments to come forward and be sustainably integrated with existing communities. The Borough's larger settlements, including Bebington, have, by their nature a greater number and range of required community and social infrastructure needed to support growing populations. Bebington is a well-served settlement in respect of such social infrastructure.

1.11 Residential development at the Site would add choice to the local housing market through the delivery of high-quality, 2, 3 and 4 bedroom market and affordable homes in a landscaped, urban extension setting.

1.12 The proposed masterplan as provided in the Development Statement envisages a density of up to 35 dph. This is 50% higher than the average density of development achieved across other Greenfield sites in the Borough between 2017 -20191 . The Site therefore presents a good opportunity for a more efficient use of land than has been seen elsewhere in the Borough in recent years, whilst still providing Story Homes, a known high quality developer, with a good mix of 2 ,3, 4 bedroom homes to bring to the market. This mix of houses will meet the objective of draft Policy WS 3.4 in respect of the provision of larger family housing and will be aligned to the October 2021 SHMA, which found that over the plan period Wirral should be delivering 10% 1 beds, 30% 2 beds, 40% 3 bed houses and 20% 4 bedroom houses.

Technical Suitability

Heritage

1.13 The site does not include any listed buildings and is not within a Conservation Area. There are no Scheduled Ancient Monuments within the site boundaries and the site is not within a designated World Heritage site.

Flood Risk and Drainage

1.14 The site is not at risk of flooding from any rivers or surface water. The site lies within Flood Zone 1 and is therefore very unlikely to be affected by fluvial flooding during severe rainfall events.

Public Rights of Way

1.15 There are no Public Rights of Way (PRoW) on the Site. Footpath number: 431037 is located to the west of the site and connects into the wider footpath network the potential for a pedestrian connection to this footpath could be explored as development proposals for the site progress.

Ecology and Trees

1.16 The Site does not accommodate any local, regional or national sites of ecological or geological importance. There are no known protected habitats on the site and any development could accommodate existing ecological features, where appropriate.

Access

1.18 Access to the site can be achieved from Old Clatterbridge Road as highlighted in the Development Statement. Pedestrian and cycle access arrangements can be provided and are shown on the Illustrative Masterplan. Curtins have prepared a Traffic and Transport report that considers highways capacity in the surrounding highway network to the site. It concludes that there is sufficient highway capacity for the residential development of this site without having a severe impact upon highway operation and the nearby M53 junction.

Conclusion on suitability

1.19 It is evident that there are no technical constraints which would impede the development of the site.

Availability

1.20 The site is in a sustainable and desirable location and could be a 'flagship' project for Wirral in improving the quality of housing stock in a prominent gateway location. A planning application for c320 homes could be submitted promptly by Story Homes to WBC following allocation in the WLP. A development of c320 units would provide accelerated delivery of the high-quality aspirational housing that the Borough needs, as it is envisaged that two sale outlets would be available on site.

1.21 The site is in single ownership and under option agreement with Story Homes; a willing housebuilder with 30 years history of developing across the North of England. There are no ownership restrictions affecting the land that would preclude or delay delivery. The site is therefore readily available with a realistic prospect of delivery within 5 years in accordance with PPG.

Achievability

1.22 The allocation of this site for residential development, where there is a willing landowner and a quality developer legally committed, means that the Site is developable and deliverable. The site could deliver approximately 320 new homes as demonstrated in the Development Statement in a sustainable location in line with the identified housing needs for the Borough.

Summary

1.23 It has been demonstrated within this Chapter that the proposed site is available, suitable and achievable, with a realistic prospect that the site could be developed for approximately 320 dwellings and completed within 5 years from adoption of the Local Plan. The land therefore represents a deliverable opportunity for residential development to meet WBC's housing needs. The allocation of this site within the Local Plan would therefore meet the tests of soundness within Paragraph 35 of the NPPF.

<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>Story Homes have a strong track record of bringing sites through the local plan system and they believe they can assist the Inspector in exploring the issues with the most up to date information and therefore wish to participate orally in the EiP.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

Comment ID	LPSD-418
Person ID	1246766
Include files	
Consultee Name	Mrs Elizabeth Webster
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 1
Title	The Development and Regeneration Strategy for Wirral 2021 - 2037
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	3.15 Housing Need
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
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Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	see answer to question 6

<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>	
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<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>Document H8 Wirral SHMA Update states that the growth of households over the period to 2037 is 8,884 households therefore the annual target of housebuild should be significantly reduced.</p> <p>Whole life carbon assessments now lead to Government preference for refurb/retrofit rather than new build. Again the new build target should be significantly reduced to reflect this.</p> <p>Reduce new build target from 13,360 to 9,000</p>

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

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

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

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	
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LPSP-419

Comment ID	LPSP-419
Person ID	1323696
Include files	LPSP-409, 414, 417, 419-424-EM-Fryer Attach 1 of 3 2207_Redacted.pdf LPSP-409, 414, 417, 419-424-EM-Fryer Attach 2 of 3 2207_Redacted.pdf LPSP-409, 414, 417, 419-424-EM-Fryer Attach 3 of 3 2207_Redacted.pdf LPSP-419-EM-Fryer Form 4 of 9 2207_Redacted.pdf
Consultee Name	Ms Hannah Richins
Position	
Company / Organisation	Story Homes
Agent ID	1323694
Agent Name	Ms Jenny Fryer
Position	
Company / Organisation	Pinnacle Planning
Number	Policy WS 1.1
Title	Homes
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this	WS 1.1

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

Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.

Please refer to Attachment 1 and Consortium representation (LPSP-419 attachments 2 and 3)

1.1 Policy WS1.1 comprises the housing section of Policy WS1 of the WLP and establishes the housing strategy for development in Wirral.

Housing Requirement

1.2 The Policy states that the Local Plan will provide for a minimum of 13,360 net additional dwellings, including affordable homes. Dwellings are proposed to be delivered through the creation of new neighbourhoods on brownfield land, as well as through the development of suitable sites within Settlement Areas.

1.3 Paragraph 3.15 of the WLP establishes the basis of the annual housing need figure of 835 dpa for the plan period, 2021-2037, with Footnote 36 providing the following calculation:

"SHMA p 120 para 7.4, which includes 779 per annum based on the Governments standard methodology for calculating housing need, plus an uplift of 6 per annum to support economic growth. In addition, an allowance of 50 dwellings each year is added to make up for demolitions {totalling 835 pa}."

1.4 Given Wirral's failure to maintain an up to date Local Plan for the last twenty years, this represents only a tokenistic increase above the minimum housing requirement. Over a sixteen year plan period, only an additional 96 units over the minimum requirement set by central government is proposed. This uplift would not allow or plan for economic growth over the Local Plan period in any meaningful way.

1.5 Following the ONS publication of affordability data in April 2022, Wirral's minimum local housing need increased to 785 dwellings per annum, thus reducing the already small number of dwellings over the minimum requirement that Wirral are planning for. The increase in minimum local housing need from the Standard Method results demonstrates the extent to which affordability is an issue in Wirral and the importance of allocating a sufficient number of deliverable sites.

1.6 The Lichfields Technical Paper 1 prepared on behalf of the Consortium of developers (see Appendix to the annexed Written Representations) concludes that "the failure to boost housing provision over and above the LHN baseline will mean that either employment opportunities will be foregone, or we will see a substantial, and unsustainable, increase of in-commuting to the Borough".

1.7 Paragraph 61 of the NPPF confirms that exceptional circumstances can justify an alternative approach to calculating housing needs that reflect current and future demographic trends and market signals.

1.8 Story Homes considers the Borough's affordable housing need alone to be an exceptional circumstance that warrants a higher housing requirement figure. An increase to the housing requirement would promote and support economic growth as local businesses would stand an improved chance of being able to attract and retain the best talent due to access to areas with good quality housing.

1.9 Lichfields' Technical Paper 1 includes a number of alternative strategies for calculating the housing requirement, several of which include:

- Affording a more aspirational housing requirement to align with the growth aspirations for Wirral Waters Employment Zone and the Liverpool City Region employment growth aspirations.
- Increasing the housing requirement to meet the demand and reduce the risk that housing affordability levels will worsen, and people will not have access to suitable accommodation to meet their needs.
- Pro-rata the governments standard method calculation at a national scale (298,166 homes per year) to Wirral; this reflects a national average rate of affordable housing delivery. At a growth rate 1.12% which relates to the national 300,000 dpa target, Wirral could be planning for 1,680 dpa.

1.10 The implication of the Lichfields analysis is to demonstrate that WBC's preferred housing target is insufficient to support its economic growth aspirations. Story Homes supports the conclusion of the Technical Paper 1 which states:

"An uplifted housing target in the order of around 1,159 dpa allows for the improvement of negatively performing market signals through the provision of additional supply, as well as helping to meet affordable housing needs and supporting economic growth."

Housing Supply

1.11 Paragraph 3.15 of the WLP also highlights that it will be necessary to identify a larger supply to make allowances for the potential that sites may not come forward at the pace expected. It is stated that the Local Plan therefore makes provision for the delivery of approximately 17,750 dwellings. However, it is not clear where this figure of almost 18,000 dwellings has been derived from as both Table 3.2, and the table within Policy WS1.1, indicate a maximum claimed supply of 16,322 over the Plan period.

1.12 The Table indicates that Regeneration Areas, which are mostly grouped together around Birkenhead, account for more than 50% of the WLP's total claimed supply (8,874). Coupled with that, the table is also claiming that 3,490 (21% of the total supply) will be delivered from windfall sites across the plan period.

1.13 In order to highlight the step change in delivery and the required level of investment, Pinnacle has undertaken an assessment of historic delivery within Wirral.

1.14 The consistent under delivery of housing is highlighted in Figure 2.4 of the SHMA 2021 and confirms that annual completion rates are consistently below the relevant housing requirement for all but three years since 2006/07. An extract of Map 2.2 in the SHMA is provided below which demonstrates the geographical focus of built residential development in the Borough. The eastern side of the Borough has had the majority of new development and this has been focussed around the Birkenhead area and Bromborough. Bebington, Clatterbridge, Heswall, Thirby, Prenton, Greasby, Hoylake and Meols have all had less than 25 units built between 2007 and 2018 (Please refer to attached Form for Map).

1.15 The below table uses the SHMA 2021 net housing completions data from 2012/13 to 2019/20 and highlights the consistent failure of WBC to meet their housing requirement – averaging only 504 dpa during this period which is 168 dpa short of the average annual requirements over the 8 year period (672 dpa).

Table 1.1: Net Housing Completions (data source: SHMA 2021) (please refer to attached form for Table)

1.16 It is evident from Table 2.1 that the historic delivery within Wirral has on average been significantly lower than that anticipated for the WLP plan period. This is at least in part a factor of the nature of land that has been available. These assumptions also fail to take account of historic fluctuations in delivery related to market cycles and investor sentiment linked to major economic downturns which tend to occur approximately every ten years.

1.17 Story Homes supports the aim to deliver a greater quantum of development across Wirral with greater consistency and believes that with the right land supply this can be achieved. However, the land supply must include an appropriate mix of brown and greenfield sites and be distributed across both regeneration areas and stronger housing markets.

1.18 The preparation of the WLP is an opportunity to rectify and address the housing supply shortfall of the previous twenty years when there has been no up to date Local Plan in place and suitable housing sites have not been forthcoming.

1.19 The WLP has replaced the former Settlement Hierarchy with Settlement Areas and Regeneration Areas at Table 3.1 of the WLP. This is intended to form the overarching spatial strategy for new development, with Regeneration Areas (RA's) being locations prioritised for future growth. Incremental growth within Settlement Areas is expected through the development of a small number of residential allocations on brownfield sites within existing settlements.

1.20 There are eleven RA's, all of which are to the east of the Borough, with eight in the Birkenhead Regeneration Framework area alone. As highlighted in Table 3.2 of the WLP (provided on attached Form) the Birkenhead Regeneration Framework area alone accounts for 50% of the total supply.

1.21 To justify the supply within the Plan, the Council has produced a Strategic Housing Land Availability Assessment (SHLAA) and Housing Delivery Strategy (HDS). The HDS confirms :

"The identification of Regeneration Areas enables a strategic approach to development and will help promote the regeneration of some former industrial and waterfront locations. The levels of planned housing delivery within the Regeneration Areas takes account of development constraints such as the need for site remediation. The longer lead-in time for Regeneration Areas in the housing trajectory offers a realistic timescale, whilst also acknowledging their development potential...

There is no definition of broad locations in national planning policy but for the purposes of the Wirral Local Plan Submission Draft they do not have physical boundaries other than being located within specific Regeneration Areas, which are defined on the Policies Map, and are taken to be general areas of brownfield land on which housing could reasonably be expected to be delivered based on the availability of land for such development, the enabling policies of the Local Plan Submission Draft to promote market intervention and specific intervention by the Council and other delivery partners."

1.22 Areas of Birkenhead perform significantly worse than settlements to the west of the Borough, with much higher levels of deprivation. The spatial strategy is therefore seeking to boost significantly the competitiveness of Birkenhead and other settlements in the eastern parts of Wirral, whilst seeking to sustain western and southern areas. Story Homes

1.23 The supply category titled 'Allowances' includes net gains from conversions and changes of use, new build windfalls and the return to use of empty homes. If the anticipated allowances supply is delivered, a significant proportion of these homes will also be within the Birkenhead Regeneration Area.

1.24 Story Homes supports the regeneration of Birkenhead but is concerned that this is at the detriment of other settlements in the Borough. The current draft housing delivery strategy is not justified as there is insufficient evidence to confirm that Birkenhead's regeneration is deliverable in accordance with NPPF. Chapter 5 of Lichfields' Technical Paper 4 addresses the issue on the housing land supply from the inclusion of sites that have been available for a number of years, are owned by a developer and supported by the Council.

1.25 The regeneration of Birkenhead and Wirral Waters has been supported by WBC for a number of years, yet the regeneration aspirations have never materialised. The WLP is not justified as the Council is claiming that 8,492 units, more than 50% of the claimed supply (excluding commitments), will be delivered in this relatively small geographical area which is characterised by a very poor existing housing market area with fundamental viability issues (topics are addressed later in this chapter).

1.26 The Council have provided insufficient evidence to suggest there is any change in circumstance that would have a material impact on the delivery of urban brownfield sites that have remained undeveloped for such a long period of time. It is also alarming that there is no evidence to justify the change in housing land supply within RA's 1 to 8 between the Regulation 18 version of the Plan and the current WLP – previous stated capacity was 5,480 and current stated capacity is 8,492 dwellings.

1.27 Story Homes considers that the reliance on brownfield development will mean that an insufficient number of new market and affordable dwellings will be delivered in the plan period, principally due to land values and costs associated with demolition and remediation. The Plan will therefore not be effective, as required by paragraph 35 of the NPPF, and is not considered to be sound.

1.28 These challenges are also addressed in respect of draft Policies WS 3.1, WS 3.2, WS 3.3 and WS 3.4.

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

Yes

**Please give details of
why you consider the
Local Plan complies**

with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
<p>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</p>	<p>Housing Requirement</p> <p>1.1 Robust evidence should be prepared by the Council that meets the requirements of the Framework and PPG. This evidence should include a robust assessment of how to align the housing requirement with the economic growth aspirations. It must also take account of the contextual issues in Wirral, including the affordable housing need and needs of other groups of the community.</p> <p>1.2 Story Homes consider that, as a minimum, the housing requirement should be uplifted by a further 54 dpa to account for demolitions and also 324 dpa to align it with economic growth aspirations. The recommended housing target is 1,150 dpa which allows for the improvement of negatively performing market signals through the provision of additional supply, as well as helping to meet affordable housing needs and supporting economic growth.</p> <p>Housing Supply</p> <p>1.3 The Consortium is of the opinion that significant changes are required to Policy WS 1.1 for it to meet the test of soundness. The Consortium's analysis concluded that the total residential supply from the sources in Policy WS 1.1 is less than 7,000 dwellings, as opposed to the 16,332 claimed by the Council. The Council would need to identify a significant number of additional deliverable and developable sites to address this shortfall. It is considered that in all probability some Green Belt sites would be required to meet the identified overall need in Wirral and provide a distribution of development that would properly meet those needs across the Borough, and not just in the East.</p>

<p>with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>1.4 The WLP in its current form cannot be found sound and fundamental changes are required including the identification of additional supply from the Green Belt (as well as identifying safeguarded land for beyond the plan period). The issue needs to be tackled now and we cannot wait for the next Local Plan review cycle to identify suitable and deliverable sites. The Council has been pursuing this failed strategy for 20 years and nothing presented in this WLP provides any comfort that sufficient land has been identified to meet the Borough's need.</p> <p>1.5 Given the significance of Policy WS 1.1 to the overall WLP strategy, and the quantum of the recommended changes required to make this policy sound, it will not be possible to rectify these fundamental soundness issues through the main modifications process.</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>Story Homes have a strong track record of bringing sites through the local plan system and they believe they can assist the Inspector in exploring the issues with the most up to date information and therefore wish to participate orally in the EiP.</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</p>	<p>Yes</p>

**Local Plan
2021-2037? (namely
submission of the
Plan for examination,
publication of the
Inspector's
recommendations
and adoption of the
Plan).**

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

LPSP-420

Comment ID	LPSP-420
Person ID	1323696
Include files	LPSP-420-EM-Fryer Form 5 of 9 2207_Redacted.pdf LPSP-409, 414, 417, 419-424-EM-Fryer Attach 1 of 3 2207_Redacted.pdf LPSP-409, 414, 417, 419-424-EM-Fryer Attach 3 of 3 2207_Redacted.pdf LPSP-409, 414, 417, 419-424-EM-Fryer Attach 2 of 3 2207_Redacted.pdf
Consultee Name	Ms Hannah Richins
Position	
Company / Organisation	Story Homes
Agent ID	1323694
Agent Name	Ms Jenny Fryer
Position	
Company / Organisation	Pinnacle Planning
Number	Policy WS 2
Title	Social Value
To which part of the Local Plan does this representation relate?	Policy
* Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat Regulations Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this	WS 2

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

<p>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</p>	<p>Please refer to Attachment 1 and Consortium representation (LPSD-419 attachments 2 and 3)</p> <p>1.1 Story Homes supports the inclusion of a Policy on Social Value and recognise the benefits of promoting the use of local labour for construction and occupation. 1.2 Policy WS2 requires applications for major developments to be supported by a Social Value Statement.</p> <p>The second point of section B of the draft Policy seeks to secure local sourcing of products and materials. Whilst Story Homes acknowledges the importance of using appropriate materials that reflect the character of the local area, a requirement that materials should be sourced from local vendors is overly restrictive.</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	<p>Yes</p>
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	

<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Story Homes considers that the following modification to the Policy text is required:</p> <p>"B. Major development proposals 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:</p> <ol style="list-style-type: none"> 1 Local labour policy for construction and occupation of the development covering skills and training provision including apprenticeships; and 2 Local sourcing of products and materials, <u>where possible</u>."
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>No, I do not wish to participate in hearing session(s)</p>

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

LPSP-421

Comment ID	LPSP-421
Person ID	1323696
Include files	LPSP-409, 414, 417, 419-424-EM-Fryer Attach 2 of 3 2207_Redacted.pdf LPSP-409, 414, 417, 419-424-EM-Fryer Attach 3 of 3 2207_Redacted.pdf LPSP-409, 414, 417, 419-424-EM-Fryer Attach 1 of 3 2207_Redacted.pdf LPSP-421-EM-Fryer Form 6 of 9 2207_Redacted.pdf
Consultee Name	Ms Hannah Richins
Position	
Company / Organisation	Story Homes
Agent ID	1323694
Agent Name	Ms Jenny Fryer
Position	
Company / Organisation	Pinnacle Planning
Number	Policy WS 3.1
Title	Housing Design Standards
To which part of the Local Plan does this representation relate?	Policy
* Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat Regulations Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this	WS 3.1

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

<p>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</p>	<p>Please refer to Attachment 1 and Consortium representation (LPSD-419 attachments 2 and 3)</p> <p>1.1 Policy WS 3.1 stipulates that new residential dwellings should comply with nationally described minimum space standards and water efficiency standards. Residential development is also expected to be zero carbon ready by design as well as being accessible and adaptable in line with Part M4(2) of the Building Regulations, with 6% of major new build developments to be wheelchair adaptable.</p> <p>1.2 Story Homes has no objection to the principle of this draft Policy, but would argue that these requirements, coupled with the housing density and mix requirements as set out in Policies WS 3.2 and WS 3.4, may result in viability issues across some of the sites within the trajectory. Where additional costs are incurred, as a result of site remediation works to a brownfield site for example, the ability to develop a scheme that is zero carbon ready by design is likely to be challenging.</p> <p>1.3 Story Homes considers there to be a need for additional greenfield sites to be included in the trajectory to ensure delivery of a sufficient number of dwellings, including affordable housing, all built to an appropriate standard.</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	<p>Yes</p>
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying</p>	

Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>The Consortium advises that the WLP CIL & Viability Assessment 2022 is updated to take account of the costs of Future Homes Standard so that the viability of the housing land supply is not overstated. The Council must then identify deliverable and developable residential sites that can viably meet the requirements of Policy WS 3.1.</p>
If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? * No, I do not wish to participate in hearing session(s)	<p>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>Story Homes have a strong track record of bringing sites through the local plan system and they believe they can assist the Inspector in exploring the issues with the most up to date information and therefore wish to participate orally in the EiP.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

LPSP-422

Comment ID	LPSP-422
Person ID	1323696
Include files	LPSP-422-EM-Fryer Form 7 of 9 2207_Redacted.pdf LPSP-409, 414, 417, 419-424-EM-Fryer Attach 1 of 3 2207_Redacted.pdf LPSP-409, 414, 417, 419-424-EM-Fryer Attach 3 of 3 2207_Redacted.pdf LPSP-409, 414, 417, 419-424-EM-Fryer Attach 2 of 3 2207_Redacted.pdf
Consultee Name	Ms Hannah Richins
Position	
Company / Organisation	Story Homes
Agent ID	1323694
Agent Name	Ms Jenny Fryer
Position	
Company / Organisation	Pinnacle Planning
Number	Policy WS 3.2
Title	Housing Density
To which part of the Local Plan does this representation relate?	Policy
* Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat Regulations Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this	WS 3.2

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

<p>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</p>	<p>Please refer to Attachment 1 and Consortium representation (LPSP-419 attachments 2 and 3)</p> <p>1.1 Policy WS 3.2 relates to housing density and establishes the minimum density requirements across a number of zones ranging from 40 to 70 dwellings per hectare, dependent on proximity to public transport, amenities, open space and services. Parts of Settlement Area 4: Bebington, Bromborough and Eastham, are within different density zones as show on the Proposals Map. Areas outside of the defined density zones, such as the Brimstage Road site, are required to provide a minimum of 30 dwellings per hectare.</p> <p>1.2 It is the view of Story Homes that WBC are adopting a flawed approach to plan making by relying on minimum density requirements to meet their housing requirement. Whilst it is understood that WBC wants new housing development to be sustainably located close to services and amenities, an approach which focuses almost all planned growth on small brownfield sites in urban locations is unlikely to be deliverable. Achieving viable schemes at the stated density requirements is likely to mean that other policy requirements in regard to biodiversity net gain and the inclusion outdoor amenity space cannot be achieved. This will be to the detriment of meeting the identified housing need in sustainable way.</p> <p>1.3 The SHMA 2021 concludes that around 60% of new dwellings across the borough should be 3 bedroom dwellings. However, the SHMA also acknowledges that there is a “need to deliver a range of smaller dwellings (particularly bungalows/level access accommodation) for older people in the general market and specialist older persons housing” .</p> <p>1.4 There is insufficient evidence to suggest high density development can meet the range of housing typologies for which there is an identified need. WBC have published a Birkenhead High Density Family Homes Study (2022) and the High Density Housing Study Schedule on page 31 includes a number of case study examples where high density developments, including 2, 3 and 4 bedroom townhouses, have been achieved. The density of the examples range between 49 dph and 131 dph.</p> <p>1.5 The examples used in the High Density Housing Study Schedule are located in cities with very different housing markets and differing supply / demand issues (e.g Cambridge, London, Birmingham, Bristol). As such, it is difficult to apply the specific supply and demand scenarios of metropolitan boroughs to an area such as Wirral with significantly different land supply demands. It is noteworthy that the other neighbouring Authorities around Wirral have not progressed with minimum density policies, potentially for these reasons. In light of this, Story Homes do not consider the minimum density policy to be sound on the basis that it has not been justified and does not comply with Paragraph 35 of the NPPF.</p> <p>1.6 Pinnacle have also undertaken a review of the housing density data which demonstrates that of the 21 examples in the High Density Housing Study, only nine are located in the north of England and only two schemes are from the Liverpool City Region. The average densities of these northern examples (67 dph) do not meet the proposed minimum density for Birkenhead (70 dph). Furthermore, of the nine northern examples, only one scheme was able to provide affordable units.</p> <p>1.7 This demonstrates that, not only will the proposed minimum density requirements likely not be met in high density zones, but also that the needs of local residents in respect of affordable housing will not be met.</p> <p>1.8 Whilst the delivery of housing within the Birkenhead area has increased in recent years with the Docklands and Wirral Waters schemes, the strategy assumes that this level of delivery will be maintained and the current level of investment in Birkenhead's housing market will remain. This assumption takes no account of historic fluctuations in delivery related to market cycles and investor sentiment or the level of government funding that is necessary to bring these sites forward.</p> <p>1.9 Story Homes is of the view that limited analysis has been provided to demonstrate there is a developer and end-user market for the scale of high density developments proposed in Birkenhead and that focussing much of the housing delivery to one geographical area could affect absorption rates as the market reaches saturation point.</p> <p>1.10 It is also worth noting that the market is changing following the recent disruption caused by the Covid pandemic. The desire to live and work in a town or city centre is not as it was and the demand for residential properties with more space has increased exponentially. Savills research from June 2021 highlights that of those who were currently mid-purchase at the time, 54% named extra living space, 40% a larger garden and 33% an extra bedroom in their top two ‘must haves’ in a new home.</p> <p>1.11 Increasing densities should not be at the expense of the wider placemaking agenda. National guidance was relatively recently updated to demonstrate government commitment to placemaking and good design in the built environment; with the publication of a National Design Guide; Planning practice guidance for beautiful, enduring and successful places (October 2019). The Design Guide adds to and strengthens existing national design policy, which is set out in an updated NPPF (2021) and supplementary planning guidance documents. The WLP should be strongly advocating the importance of the design and placemaking agenda.</p> <p>1.12 Given the above, it is the view of Story Homes that successful plan-making and place-making is much more nuanced than simply setting a minimum density policy to maximise delivery on the minimum amount of land possible. There are many factors to be considered such as utilities provision, market demand, physical constraints (including remediation needs), design quality and sustainability. Flexibility should be built into the plan making system to recognise that sites have different challenges and opportunities, which will influence what the optimum numbers of dwellings will be on a scheme. A pragmatic approach is more likely to ensure that a sufficient level of housing comes forward in-line with the Councils development trajectory, in sustainable locations as identified by the Council with the focus retained on place-making.</p> <p>1.13 Story Homes notes that there needs to be a choice of size, type and tenure of houses within a range of locations across the Borough for developers to invest in an area and take a risk on developing a residential site. If a Local Plan only provides for a narrow range of sites, in similar locations with stringent requirements on density, then the market will not be able to absorb the supply and dwellings will not be delivered to respond to market requirements. This will further impede the Council's ability to stimulate economic growth and attract a working-age population to the Borough.</p> <p>1.14 Story Homes considers that the housing land supply is not based on evidence of what type of homes are needed, but purely on maximising and exaggerating the claimed capacity of every available site in the urban area regardless of its deliverability or viability. The removal of this Policy from the WLP and revisiting the housing land supply data (see Lichfields' Technical Paper 4) to apply more realistic density estimates would result in a need to allocate more sites for residential development.</p>
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	<p>1.15 A major step change in delivery as well as significant government funding is required and the Plan does not fully address these matters, meaning there is insufficient information to demonstrate that the housing land supply is deliverable or developable. The Plan therefore fails to demonstrate that the housing supply will be delivered and fails the tests of soundness in respect of being justified and effective.</p> <p>1.16 In this situation Story Homes would advocate the allocation of greenfield land to ensure larger family housing and affordable housing can be viably provided in sustainable locations. The Brimstage Road site is controlled by a willing developer and can be delivered within five years of its allocation. The site is in a sustainable location adjoining an existing settlement and could boost the quality and choice of housing in the local area.</p>
omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	

<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 underlying issues with Policy WS 3.2 relate to the Council's urban intensification strategy. The densities proposed by the policy are not viable for the sites identified in the WLP and will not deliver the housing mix set out in Policy WS 3.4 either. The Council must therefore reduce its required densities and identify additional sites that can be viably delivered in Wirral. Given the quantum of changes required, it will be difficult to address the soundness issues of Policy WS 3.2 through the main modifications process.</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>Story Homes have a strong track record of bringing sites through the local plan system and they believe they can assist the Inspector in exploring the issues with the most up to date information and therefore wish to participate orally in the EiP.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

LPSP-423

Comment ID	LPSP-423
Person ID	1323696
Include files	LPSP-409, 414, 417, 419-424-EM-Fryer Attach 2 of 3 2207_Redacted.pdf LPSP-409, 414, 417, 419-424-EM-Fryer Attach 3 of 3 2207_Redacted.pdf LPSP-409, 414, 417, 419-424-EM-Fryer Attach 1 of 3 2207_Redacted.pdf LPSP-423-EM-Fryer Form 8 of 9 2207_Redacted.pdf
Consultee Name	Ms Hannah Richins
Position	
Company / Organisation	Story Homes
Agent ID	1323694
Agent Name	Ms Jenny Fryer
Position	
Company / Organisation	Pinnacle Planning
Number	Policy WS 3.3
Title	Affordable Housing Requirements
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this	WS 3.3

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

<p>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</p>	<p>Please refer to Attachment 1 and Consortium representation (LPSD-419 attachments 2 and 3)</p> <p>1.1 Draft Policy WS 3.3 confirms that all residential schemes of 10 dwellings or more will be required to provide affordable housing.</p> <p>1.2 The Housing Delivery Strategy confirms that viability testing has been undertaken and demonstrates a need for 20% of newly built housing to be affordable. The Strategy reports that “it will be challenging for developers to provide this scale of affordable housing as part of development schemes for market housing in some of the lower value area of the Borough, and particularly the Regeneration Areas.”</p> <p>1.3 As a result, Viability Zones are proposed which set the minimum percentage of affordable homes to be provided; Zones 1 and 2 require 10% and Zones 3 and 4 require 20%.</p> <p>1.4 The north western area of Wirral, including Birkenhead, and over half of the housing sites are within affordable housing Zones 1 and 2 where the need for affordable housing is most acute. Story considers 10% affordable housing provision in Zones 1 and 2 to be optimistic given the extent of land remediation and challenges to delivery in these locations.</p> <p>1.5 The SHMA 2021 confirms there is an existing overall gross affordable housing need of 2,202, which equates to 374 affordable dwellings annually. The minimum overall housing requirement is 13,360 between 2021 and 2037 which equates to 835 dwellings per annum. The affordable housing needs are clearly not going to be met if affordable housing is mostly being planned at 10%, yet to meet the identified affordable housing requirement 45% of the housing requirement would need to be affordable.</p> <p>1.6 Whilst the Zoning system may seem an acceptable approach to implementing affordable housing requirements across the Borough in principle, Story Homes are of the view that the WLP will simply not meet the affordable housing needs of the Borough nor rectify past failures to deliver sufficient affordable housing. In the context of Paragraphs 60 – 62 of the NPPF, the Policy does not reflect the assessed affordable housing need.</p> <p>1.7 Whilst the regeneration of Birkenhead is commendable, the settlement and borough wide housing strategy clearly fails to plan for sufficient affordable housing to meet the needs of existing residents. The Birkenhead Housing Market Study (2022) confirms:</p> <p>“This entrenched deprivation has contributed to and been worsened by the collapse of the housing market. As investment in areas has fallen, those who have been able to afford it have moved out. With a declining population, the quality and availability of local services and amenities has reduced along with environmental quality”.</p> <p>1.8 This acknowledges that there are residents in Birkenhead unable to afford to move out of some of the most deprived areas. While the regeneration aim is to ‘repopulate’ Birkenhead, a key demographic of the Borough’s population has been overlooked and the existing residents may be forced to leave Birkenhead.</p> <p>1.9 Given over 50% of the housing trajectory is within the Birkenhead Regeneration Area, and therefore will only deliver 10% affordable housing this under-delivery is a fundamental flaw of the Local Plan. Significant additional residential allocations are required within Zones 3 and 4 to ensure affordable housing needs are met at a Borough wide level.</p> <p>1.10 The Council’s strategy of guiding investment and development opportunities to areas where the most people will receive the benefit makes logical planning sense. Underpinning this approach should be a fundamental aim to achieve a balanced distribution of development sites and investment across all settlements, or at least all settlements east of the M53, rather than the heavily skewed focus on Birkenhead and Wirral Waters. A more balanced distribution could see more of the urbanised centres east of M53 receiving a greater proportion of growth than is set out in the emerging Local Plan. This balanced approach would help to meet all housing needs, rebalance affordability and provide choice in the housing market.</p> <p>1.11 Lichfields’ Technical Paper 3 provides commentary and an assessment of affordable housing need and supply. The consortium challenges the affordable housing requirement figure of 374 dpa and instead considers that the figure could be as high as 1,430 dpa .</p> <p>1.12 The assessment includes a review of the Council’s evidence base on affordable housing provision and a critique of the Council’s approach of addressing the backlog of affordable housing need as a result of previous under-delivery.</p> <p>1.13 As highlighted by Lichfields, there is a lack of evidence to explain the change in approach to the methodology for calculating the affordable housing requirement from the 705 dpa in the 2019 SHMA and 374 dpa in the 2021 SHMA. This is a decrease of 89% despite there being evidence of the affordable housing need having exacerbated in recent years due to a stall in delivery of new dwellings.</p> <p>1.14 Similar discrepancies are evident between datasets when comparing the 2019 and 2021 SHMA’s in respect of current need. Arc4 changed the dataset used from a 2019 household survey to DLUHC Live table (2019) in the 2019 and 2021 SHMA respectively. Despite there being evidence to the contrary, Arc4’s updated methodology presents a picture where the number of affordable housing tenants has fallen substantially and the percentage of households that are unable to afford open market housing has declined between 2019 and 2021.</p> <p>1.15 The strategy for meeting affordable housing need is therefore not positively prepared, justified or effective and is therefore unsound in its current format, contrary to Paragraph 35 of the NPPF.</p> <p>1.16 Story Homes is of the view that high, and worsening, affordable housing need is a detriment to residents’ social wellbeing as well as being major constraint to growth, investment and regeneration in the Borough. It is for these reasons that Story Homes considers the backlog needs to be frontloaded to the first five years of the Plan period, as opposed to the first ten years.</p>
<p>complies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please</p>	<ol style="list-style-type: none"> 1 The Council must undertake a robust assessment of its affordable housing need. 2 Based on the requirements of Policy WS 3.3, the supply of sites identified in the WLP will not address the identified affordable housing needs for the Borough. The Council needs to identify and release sustainable and suitable sites in Wirral which can viably deliver at least 20% affordable housing. 3 We consider that the quantum of affordable housing need required in Wirral cannot be addressed by the Council's urban intensification approach. The level of affordable housing need alone in Wirral represents exceptional circumstances to justify changes to the Green Belt boundaries to allocate sites capable viably delivering affordable housing. 4 Given the obvious issues associated with the delivery of affordable housing in Wirral (e.g. viability issues, large number of small sites, conversions, windfalls identified and relied on by the Council) compared with the significant overall need for affordable homes, we consider that an alternative strategy needs to be adopted by the Council. 5 As the fundamental issues with Policy WS 3.3 relate to the Council's urban intensification strategy, it will not be possible to address these soundness issues through the main modifications process.

<p>note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>Story Homes have a strong track record of bringing sites through the local plan system and they believe they can assist the Inspector in exploring the issues with the most up to date information and therefore wish to participate orally in the EiP.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept</p>	<p>Yes</p>

updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).

* Yes
* No

LPSP-424

Comment ID	LPSP-424
Person ID	1323696
Include files	LPSP-424-EM-Fryer Form 9 of 9 2207_Redacted.pdf LPSP-409, 414, 417, 419-424-EM-Fryer Attach 1 of 3 2207_Redacted.pdf LPSP-409, 414, 417, 419-424-EM-Fryer Attach 3 of 3 2207_Redacted.pdf LPSP-409, 414, 417, 419-424-EM-Fryer Attach 2 of 3 2207_Redacted.pdf
Consultee Name	Ms Hannah Richins
Position	
Company / Organisation	Story Homes
Agent ID	1323694
Agent Name	Ms Jenny Fryer
Position	
Company / Organisation	Pinnacle Planning
Number	Policy WS 3.4
Title	Housing Mix
To which part of the Local Plan does this representation relate?	Policy
* Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat Regulations Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this	WS 3.4

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

<p>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</p>	<p>Please refer to Attachment 1 and Consortium representation (LPSD-419 attachments 2 and 3)</p> <p>1.1 Draft Policy WS 3.4 states that new residential development must provide “an appropriate type, size and tenure to meet the needs of the local community” in accordance with the NPPF. Reference is made to specialist housing for older people and people with specialist needs.</p> <p>1.2 The Policy seeks to place a minimum dwelling size (bedroom number) stipulation on new residential developments so to achieve a minimum of 70% of market dwellings as three bedrooms or more outside Regeneration Areas, and a minimum of 30% within Regeneration Areas.</p> <p>1.3 Criteria is then provided which “will be taken into account when assessing whether sites are capable of accommodating larger dwellings”. It is not clear why these criteria are provided as there is no reference to the minimum dwelling size requirements being optional or to a requirement for an assessment if the minimum dwelling size is not met. The practicality of demonstrating compliance, or justifying noncompliance, with the Policy requires further thought and the Policy wording to be modified for clarification purposes.</p> <p>1.4 For reference the criteria are as follows:</p> <p>“whether the resulting development will be appropriate to the character of the surrounding area;</p> <p>whether the resulting development would fulfil other identified aspirations of the Council, including the need to support a viable form of development to secure necessary social, economic and environmental benefits; or</p> <p>whether local evidence of housing need and demand indicates that an alternative mix of housing would be more appropriate to secure; or</p> <p>whether alternative provision would meet another aim of the Council, such as provision for elderly persons (including bungalows) or other specialist housing needs and a proportion of the site can still be developed as family housing.</p> <p>1.5 If the purpose of the criteria is to allow developers to justify a departure from the minimum size requirements, Story Homes are not of the view that the Policy as drafted is justified or positively prepared.</p> <p>1.6 The Council's own evidence points to a need for more family dwellings at a Borough-wide level. Setting minimum requirements that can be argued away by reference to the above criteria adds an additional layer of complexity to delivering residential sites. A Policy that promotes the development of larger dwellings, where possible, and maintaining an up to date SHMA that identifies local housing needs is a more effective way of securing the right type and size of homes without adding unnecessary hurdles for developers.</p> <p>1.7 The allocation of greenfield sites outside of the Birkenhead Regeneration Area (where over 50% of the housing land supply is located) will ensure the Borough-wide need is met in a dispersed manner across the Borough and not focussed in one geographical location.</p> <p>1.8 The SHMA 2021 identifies overall (market, intermediate and affordable) targets for houses with the following bedrooms: 10% 1 bedroom, 30% 2 bedroom, 40% 3 bedroom and 20% 4 or more bedrooms.</p> <p>1.9 Chapter 4 of the Lichfields' Technical Paper 2 includes an assessment of the residential supply with the application of the proposed minimum bedroom size requirements. The assessment concludes that, even if the overly prescriptive Policy is applied to the housing land supply, only 38% will be for 3 or more bedrooms – falling substantially short of the 60% target in the SHMA.</p> <p>1.10 This is further evidence that the spatial strategy of focusing development on brownfield sites and in urban regeneration areas will not meet the Council's own evidenced qualitative need for new housing. The Policy clearly does not accord with paragraph 62 of the NPPF which requires planning policies to reflect local context in respect of the size, type and tenure of housing needed for different groups in the community.</p> <p>1.11 The PPG provides further guidance (paragraph: 018 Reference ID: 3-018-20190722) on assessing the suitability of sites and highlights following factors:</p> <ul style="list-style-type: none"> • appropriateness and likely market attractiveness for the type of development proposed; • contribution to regeneration priority areas; • environmental/amenity impacts experienced by would be occupiers and neighbouring areas. <p>1.12 When it comes to considering constraints, the PPG (Paragraph: 021 Reference ID: 3-021-20190722) confirms that “the assessment will need to consider what action could be taken to overcome them. Examples of constraints include policies in the National Planning Policy Framework and the adopted or emerging development plan, which may affect the suitability of the site”.</p> <p>1.13 There is no evidence that the SHLAA or WLP has considered the first or third points in regard to suitability of the residential sites in the supply and appear to focus primarily on the regeneration of Birkenhead. The north eastern section of Wirral, including Birkenhead has acknowledged viability challenges and the evidence base and WLP has therefore failed to address the market attractiveness of the claimed supply.</p> <p>1.14 As evidenced above in respect of draft Policy WS 3.1, the majority of the housing land supply is focused towards the Birkenhead Regeneration Area and the north east of the Borough generally. Story Homes questions the willingness and ability of developers to deliver the evidenced housing mix required at a Borough-wide level in this area. These brownfield regeneration areas don't have the services or existing infrastructure required to draw developers to the area at the scale envisaged and progressed as part of the WLP.</p> <p>1.15 Focusing a narrow choice of housing within a geographically small area that is known to be an underperforming housing market, will produce similar types of housing products that will not only naturally appeal to some groupings of the population more than others, but also saturate the already weak housing market.</p>
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1.16 While planning applications have been approved and some developments in the Birkenhead Regeneration Area already constructed, there are inherent risks associated with relying on new residential markets of this scale over a relatively short time period to meet its housing requirement.

1.17 The strategy of guiding investment and development opportunities to areas where the most people will receive the benefit makes sense. Underpinning this approach should be a fundamental aim to achieve a balanced distribution of development sites and investment across all settlements, or at least all settlements east of the M53, rather than the heavily skewed focus on Birkenhead and Wirral Waters. A more balanced distribution could see more of the urbanised centres east of M53 receiving a greater proportion of growth than is set out in the emerging Local Plan. This balanced approach would help to meet all housing needs, rebalance affordability and provide choice in the housing market.

1.18 It would be prudent for the WLP to make allowances for more conservative estimations on delivery in this location, as growth of this scale in such a small geographical location without proven market interest may undermine the delivery of the housing requirement if delivery falls short.

1.19 A definition of 'developable' is provided in the Glossary of the NPPF and states: "to be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged" (emphasis added).

1.20 Viability is therefore a major factor in whether a site is achievable and developable. The PPG requires a plan-making body to assess the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period .

1.21 Wirral Council accept throughout the housing evidence base documents that there are challenges in viably delivering much of the claimed supply in the town centre Regeneration Areas and this is identified in the CIL and Viability Assessment 2022. This is further evidenced in the Viability Consultation Response prepared by Roger Hannah on behalf of the Consortium and which is appended to these representations. Roger Hannah highlights the funding gap of £42.14m for essential transport infrastructure and £335.8m for additional desirable infrastructure which will be funded through developer contributions. It is unclear if the cost of these contributions per dwelling have been accounted for in the Council's Viability work to date. Roger Hannah's Report also notes the viability issues that can occur when developing brownfield sites (demolition and land remediation for example) and suggests the extent of grant funding required to deliver some of the site allocations may be considerably higher than already assumed within the Viability Report prepared by Aspinall Verdi for WBC.

1.22 The obvious risk of promoting high-density, urban, brownfield sites that may not be developable is that if the WLP fails to deliver the target number of 835 homes per annum the LPA may find itself in a vulnerable position with regards to demonstrating a deliverable housing land supply. The WLP as it stands would therefore fail to meet the tests of soundness and it will do nothing to reverse past trends or meet national housing targets of 300,000 new homes by mid-2020.

1.23 It is evident from Table 1.2 that the historic delivery across the region has consistently been lower than anticipated and this is at least in part a result of the nature of land that has been available (i.e. brownfield, poorly performing residential market areas). The Council's assumptions in respect of the house type and tenure to be provided also fail to take account of historic fluctuations in delivery related to market cycles and investor sentiment linked to major economic downturns which tend to occur approximately every ten years.

1.24 A review of previous Annual Monitoring Reports indicates that relatively recent housing delivery over the period 2015 – 2018 has resulted in the development of a larger proportion of flats/apartments; as demonstrated in Table 1.2 below.

Table 1.2: Previous completions: Apartments/Flats (Source data: WBC's Annual Monitoring Report's) (Please refer to attached Form)

1.25 The most recent SHMA (2021) also confirms that 18.4% of the housing stock across the eight Settlement Areas are flats or apartments. However, the SHMA states that the 2019 household survey found, of those households looking to move in the next 5 years, only 15.9% would like a flat or apartment. The majority (57%) of households would prefer a house (detached or semi-detached).

1.26 The housing sites within the supply are brownfield sites and predominantly in areas that expect exceedingly high densities as part of the emerging WLP. It is clear there will be an over provision of flats as a result of this strategy which is contrary to the evidenced demand in the Borough.

1.27 Story Homes supports the aim to deliver a greater quantum of development across Wirral and believes that with the right land supply this can be achieved. However, the land supply must include an appropriate mix of brown and greenfield sites and be distributed across both regeneration areas and stronger housing markets.

1.28 Whilst Story Homes is supportive of the regeneration aims for Birkenhead, it considers that the WLP relies too heavily on this area to deliver the housing the Borough needs. The sites have been available and with Council support for many years, the sites are brownfield in nature and therefore come with viability concerns. The brownfield preference will mean that an insufficient number of new market and affordable dwellings will be delivered in the plan period and it will therefore not be effective, as required by paragraph 35 of the NPPF, and should not be considered to be sound.

1.29 It has been evidenced above and at Appendix 1-5 of the written representation that the draft strategic residential policies in the WLP fail to plan for the right type of housing or allocate enough land to meet local housing needs. Story Homes agrees with the Consortium of developers that a more appropriate housing requirement figure of 1,150 dwellings per annum be adopted. The Council is urged to revisit the Green Belt Review (GBR) (2019) and allocate greenfield sites in sustainable locations to promote growth at a Borough-wide level, meet identified housing needs and support the wider regeneration objectives.

1.30 The response form to Policy WS3.2 demonstrates the suitability and availability of land south of Brimstage Road, Bebington and supports the inclusion of this site within the Council's supply to help meet the Borough's housing needs.

**omplies with the Duty
to co-operate**

Yes

* Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness	<p>Story Homes and the Consortium members are of the opinion that significant changes are required to Policy WS 3.4 for it to meet the tests of soundness. The Consortium's analysis has demonstrated that there is a fundamental mismatch between the conclusions of the Council's evidence base on the preferred housing mix, with the housing mix that would be delivered by Policy WS 3.4 and the WLP supply. This represents a fundamental issue with the WLP and not one that can be addressed through simply amending Policy WS 3.4. To address the issues raised in the Consortium's analysis, the Council would need to identify a significant number of developable sites outside of Regeneration Areas that can viably deliver family dwellings.</p>

<p>matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>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>Story Homes have a strong track record of bringing sites through the local plan system and they believe they can assist the Inspector in exploring the issues with the most up to date information and therefore wish to participate orally in the EiP.</p>
<p>Notification of Next Stages in Wirral's</p>	<p>Yes</p>

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

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

Comment ID	LPSD-425
Person ID	1323700
Include files	LPSD-425-PDF-Hutchinson-REDACTED.pdf
Consultee Name	Mr Thomas Hutchinson
Position	Management Group representative
Company / Organisation	Hoylake Vision Community Planning Forum
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 3.2
Title	Housing Density
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.2
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>Please refer to attachment.</p> <p>Policy WS 3.2 is seriously flawed in a number of ways. It has arrived in the Regulation 19 Plan on the basis of the Wirral Density Study to enable the urban areas to accommodate all the housing requirement, without proper consideration of the implications. The whole approach is aimed at creating significant new residential capacity on large swathes of previously developed urban land but it inadvertently incentivises demolition of high quality housing areas which have stood the test of time and should be sensitively remodelled and adapted to accommodate additional households using a design-led approach, not crude policy minima where developers risk refusal for underdevelopment.</p> <p>Paragraph 3.4 of the Stages 1 and 2: Summary report (December 2019) acknowledge that the larger urban settlements to the west have the character of large villages (paragraph 3.3) and that traditionally, many of these have a suburban character, with many communities being built to a medium-low density comprising either late Victorian townhouses or villas arranged</p>

along the railway lines or 20th century semi-detached dwellings. This means that whilst many of the areas have a strong urban form, the density is relatively low, at somewhere between 20 and 30 dwellings per hectare (dph) (paragraph 3.4.). The Stage 3 Study (September 2020) decides that suburban areas around rail stations such as Hoylake are now transit areas but then does not select Hoylake as a case study area for analysis. West Kirby is selected with Table 1 stating that it has been selected because "This is a small township with a wide selection of shops and services, whilst there are some gap sites there are also other opportunities such as sub-division, backland conversion and the use of upper floors - especially in the retail area." So essentially basing density for the historic suburban areas of Hoylake based on analysis of a town centre. This is simply unsound and it is noted that in response to consultation not one change was made to the report; all objections were dismissed.

Separating out density as a separate issue to design and placemaking is a mistake. Policy WS 3.2 forms part of the Strategy for Housing and sits with the fixed quantitative standards of this part of the Plan, divorced from qualitative considerations of placemaking and design quality. A fundamental aspect of density is understanding how a proposal would sit within its surrounding context and setting. This judgement should be an integral part of considering the appropriate density for a proposal and woven into the density policy itself.

Government policy on achieving appropriate densities (paragraph 1.24 of the NPPF) makes clear that planning policies should support development that makes efficient use of land should take into account of various criteria including the desirability of maintaining an area's prevailing character and setting. So there needs to be explicit wording in the Local Plan policy and supporting text which articulates the importance of the surrounding context in determining the appropriate density for a housing proposal, in particular how historic character could provide a strong reason why building at the minimum density would not be appropriate.

The policy is not clear that optimising density for a site needs to take account of matters beyond the bounds of the site itself. Whilst it is correct for local policy to specify minimum density and require strong reasons a lower density than the minima would appropriate (as set out in Paragraph 1.25 of the NPPF) the problem with WS 3.2 is that it merely uses the words "having regard to site characteristics" and paragraph 3.62 talks of "any other site-specific constraints" but makes no mention of the prevailing character of the surrounding context and setting. These matters of context and setting should be as much the starting point for considering the density for a proposal as any blanket minima.

The National Design Guide issued in January 2021 sets out the characteristics of well-designed places and demonstrates what good design means in practice. It is intended to be read alongside National Planning Policy Guidance. The National Design Guide can be used by all those involved in shaping places including in plan-making (NPPG Paragraph: 001 Reference ID: 26-001-20191001). Whilst the document is positive about increasing densities, it makes clear in paragraph 66 that built form is determined by good urban design principles that combine layout, form and scale in a way that responds positively to the context. It goes on to states that appropriate density will result from the context, accessibility, the proposed building types, form and character of the development. This is much more nuanced approach than a rigid Density Zone where the onus is on the developer to justify going below the minima.

There are also particular soundness concerns with defining a blanket 50 dwelling per hectare minima for the RES-DZ3 Transit Area Residential Density Zone which includes most of Hoylake. Defining an 800m radius around the rail station and including almost all the town within it (bar the industrial area and conservation areas) is far too crude an approach. There are many reasons why this is inappropriate.

Firstly, it takes no account of how the unique historic character of a settlement underpins its economic function as attractive places to work and visit. In the case of Hoylake, its defining historic character is centred on the 19th Century leisure boom and the subsequent planned suburban growth that resulted from the arrival of the railways in the 1860s. The Victorian and Edwardian suburbs form a vital link from the rail station and linear town centre through to the beach. The historic core is centred on the spacious streets around the Royal Liverpool Golf Club founded in 1869 on a horse racing track and near to where the ferry disembarked. Whilst the two conservation areas protects this lower density core of mainly detached villas in generous plots, many of the late Victorian building sit within areas beyond the current conservation areas, at densities considerably lower than 50 dwellings per hectare. For example, Pevsner's account of Hoylake notes the Birkenhead Della Robbia Co. tiles on Victorian semi-detached pairs that are unlisted and outside the conservation areas. The disparity between the high density target and the prevailing density will inevitably incentivise demolition and redevelopment of high quality and characterful suburbs that are an integral part of the character of the place.

There are currently no locally listed heritage assets (the appendix of the current Neighbourhood Plan contains an informal list of character buildings) but this is now being remedied by the preparation of the new Merseyside Local Heritage List, to be compiled in 2023 using Historic England's local listing methodology. Wirral Council's stated interest <https://local-heritage-list.org.uk/merseyside/local-area-heritage-summaries> is in these particular assets:

- Early vernacular buildings.
- Victorian and Edwardian villas of high architectural and/or artistic significance that are not currently listed or within a conservation area.
- Excellent examples of Art Deco, Arts and Crafts of high architectural and/or artistic significance that are not listed or within a conservation area.
- Buildings associated with early leisure and social activity (e.g. pubs) may be considered if they align with the selection criteria.

This adds to the argument that there are considerable heritage assets of value within the Density Zones and the policy needs to be amended to take account of them.

Hoylake and the other west Wirral settlements play an important role within the City Region as visitor destinations, particularly for day trips. Paragraph 5.52 acknowledges that the existing Hoylake Neighbourhood Plan (2016) provides further detail on local priorities to "enhance the distinctive Victorian and Edwardian character of the seaside resort". The Local Industrial Strategy of the City Region sets out a need to improve performance against the five 'pillars of productivity', one of which is 'thriving and distinct places'. The loss of distinctive built heritage risks undermining the vitality of its town centre and businesses that depend upon the visitor experience.

Another factor to take into consideration is that it is almost impossible to find examples outside major cities of new high quality family-oriented housing that achieves 50 dwellings per hectare. At most, 40 dwellings per hectare can be achieved if a traditional street grid/perimeter block layout is to be respected. The 'Streets for a Healthy Life' guide (published July 2022)

is a recently issued technical companion to 'Building for a Healthy Life', which is a design assessment tool and guide for new and growing neighbourhoods. It provides examples of UK streets that meet the requirements for 'healthy streets' set out in 'Building for a Healthy Life'. Even for the Duchy of Cornwall Poundbury urban extension in Dorset analysed in the document (P38), which relies on street parking bays, no front gardens and low parking standards, only 40 dwellings per hectare has been achieved.

The Stage 3 Density Report (3.4 finds that densities of 40 dwellings per hectare were typical within Conservation Areas) and in the town of West Kirby less than 40 dwellings per hectare. Again, no basis for selecting 50 dph.

In the recently issued St Helen's Local Plan Inspector's Report (paragraphs 84, 85 and 114) a minimum of 30 dwellings per hectare is required across the Plan area and whilst a minimum of 40 dwellings per hectare was to be encouraged in appropriate locations such as within or adjacent to town centres, this is described by the Inspector as 'high density' and increasing densities above this could give rise to 'town cramming'. The obvious issue is that 50 dwellings per hectare results in flatted forms which is at odds with the mix sought by the policies on housing need, which favour houses with individual front doors.

In Wirral, Paragraph 3.57 of the Plan acknowledges that SHMA identifies a need for 65% of market housing to have three or more bedrooms to accommodate families and Policy WS 3.4 seeks 70% of market housing to be larger dwellings of three or more bedrooms. The explanation in paragraph 3.57 that the Council is promoting and requiring innovative approaches to providing for family sized homes at higher densities in urban and sustainable locations is not convincing for the more constrained built-up location like Hoylake which have a generally consistent scale of 2.5 storeys maximum and sites become available on a piecemeal basis, surrounded by existing homes.

The approach is also completely at odds with the car parking standards in Appendix 8 (Policy WS 7.4) which seeks minimum parking standards of 2 spaces for 2/3 bedroom houses and 3 spaces for larger houses. Whilst dispensations may be allowed under some circumstances according to the wording of Appendix 8, the fact remains that the whole thrust of parking policy is to secure at least two parking spaces on-plot whereas the prevailing character of the Victorian and Edwardian suburbs beyond the Hoylake conservation areas relies on unallocated on-street parking and streets strongly defined by landscaped front gardens and low boundary walls which are not amenable to on-plot parking. So this make accommodating new development into this setting extremely challenging at the proposed densities and with the parking standard as proposed; it will push developments towards comprehensive demolition and development blocks with grouped parking rather than sensitive adaptation and remodelling of the existing buildings to accommodate more households.

The National Design Guide issued in January 2021 sets out the characteristics of well-designed places and demonstrates what good design means in practice. It is intended to be read alongside National Planning Policy Guidance. The National Design Guide can be used by all those involved in shaping places including in plan-making and decision making (NPPG Paragraph: 001 Reference ID: 26-001-20191001). The Local Plan should take account of the following important sections:

38 Context is the location of the development and the attributes of its immediate, local and regional surroundings.

39 An understanding of the context, history and the cultural characteristics of a site, neighbourhood and region influences the location, siting and design of new developments. It means they are well grounded in their locality and more likely to be acceptable to existing communities. Creating a positive sense of place helps to foster a sense of belonging and contributes to well-being, inclusion and community cohesion.

40 Well-designed places are:

- based on a sound understanding of the features of the site and the surrounding context, using baseline studies as a starting point for design;
- integrated into their surroundings so they relate well to them;
- influenced by and influence their context positively; and
- responsive to local history, culture and heritage.

41 Well-designed new development responds positively to the features of the site itself and the surrounding context beyond the site boundary. It enhances positive qualities and improves negative ones. Some features are physical, including:

- the existing built development, including layout, form, scale, appearance, details, and materials;
- local heritage – see below – and local character – see Identity;

43 Well-designed new development is integrated into its wider surroundings, physically, socially and visually. It is carefully sited and designed, and is demonstrably based on an understanding of the existing situation, including:

- patterns of built form, including local precedents for routes and spaces and the built form around them, to inform the layout, grain, form and scale – see
- Built form ;
- the architecture prevalent in the area, including the local vernacular and other precedents that contribute to local character, to inform the form, scale, appearance, details and materials of new development – see Identity .

46 When determining how a site may be developed, it is important to understand the history of how the place has evolved. The local sense of place and identity are shaped by local history, culture and heritage, and how these have influenced the built environment and wider landscape.

47 Sensitive re-use or adaptation adds to the richness and variety of a scheme and to its diversity of activities and users. It helps to integrate heritage into proposals in an environmentally sustainable way.

	<p>48 Well-designed places and buildings are influenced positively by:</p> <ul style="list-style-type: none"> • the history and heritage of the site, its surroundings and the wider area, including cultural influences; • the significance and setting of heritage assets and any other specific features that merit conserving and enhancing; • the local vernacular, including historical building typologies such as the terrace, town house, mews, villa or mansion block, the treatment of façades, characteristic materials and details – see Identity .
omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	

<p>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>Rewording of the policy as follows:</p> <p>New residential development within the Density Zones on the Policies Map should aim to achieve the minimum densities set out in the table below, unless it can be demonstrated that this is not appropriate having regard to:</p> <ol style="list-style-type: none"> 1 The existing density and character of the surrounding area, particularly the space around buildings; 2 The need to retain the natural and man-made features of the site; 3 any other relevant site constraints <p>The heritage value of the site and its surroundings is an important factor that would justify a density lower than the stated minima.</p> <p>In addition:</p> <p>Reduce Transit Area Density Zones (RES-DZ3) minima to 40 dwellings hectare.</p> <p>Remove the lower density areas north-east of the Kings Gap Conservation Area from the Density Zone as this area is under review as a possible extension to the Conservation Area. It should be noted that Drummond Road is already excluded from the Transit Area Density Zone, despite being close to the rail station. See attached pdf diagram.</p> <p>Consequential amendment required to Paragraph 3.62.</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>Hoylake Vision Community Planning Forum is an active Neighbourhood Planning qualifying body that has prepared the Hoylake Neighbourhood Development Plan and is currently reviewing it. It can provide a valuable perspective on Local Plan matters and wishes to engage positively with the examination.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

Comment ID	LPSD-426
Person ID	1323700
Include files	LPSD-426-PDF-HUTCHINSON-REDACTED.pdf
Consultee Name	Mr Thomas Hutchinson
Position	Management Group representative
Company / Organisation	Hoylake Vision Community Planning Forum
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 5.1
Title	Green and Blue Infrastructure Networks
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 5.1
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer to attachment. Objection to lack of provision for cycling infrastructure. Having undertaken a Wirral Liveable Streets consultation exercise in 2020 https://wirralliveablestreets.commonplace.is the various comments do not appear to have influence the Plan proposals and policies for West Wirral. An active travel (cycling and walking) infrastructure policy is needed required that covers West Wirral. Paragraph 3.196 of the Plan acknowledges that the west, south west and central areas of the Borough on the whole are less well connected than the urban eastern core. It recognises that although Wirral benefits from the National Cycle Network Route 56 and Wirral Circular Trail and improvements have taken place in recent years in the wider Birkenhead area, there is still a need to further develop high quality active travel networks.

	<p>Despite this, the Local Plan doesn't propose any active travel proposals west of Leasowe and appears to be based solely on the strategic routes identified in the Liverpool City Region in their Local Cycling and Walking Infrastructure Plan (LCWIP) for investment to 2029. The LCWIP actually makes clear that these strategic routes are to be complemented by a network of local cycling and walking routes, including quieter residential streets and routes through green spaces. The Local Plan needs to look ahead to 2037 and allow for the creation and improvement of local routes to complement the strategic routes.</p> <p>In Hoylake, the UDP (Policy TR10) identified a cycleway policy which connects West Kirby to Hoylake's North Parade, via the Kings Gap. This forms part of the National Cycle Network (Route 89) but no cycleway infrastructure has ever been provided for the Kings Gap nor for the initial stretch of North Parade (where there is a one-way street, forcing westbound cyclists onto the footway). According to Table A2.2 in Appendix 2 (Policies to be replaced by this plan), Policy TR10 is to be replaced by Policy WS 9, but this does not address West Wirral at all in any transport schemes.</p> <p>Hoylake Vision's local engagement exercise in 2020 found that local people considered connectivity to be a key issue; people asked for better connections between the town centre and the beach and a cycle lane along the promenade. There was a suggestion of embedding the promenade as part of a green walking and cycling route that would also go through town. Respondents would like to see a cycle lane to stop groups of cyclists using the pavement. Some people stressed that the roundabout was not safe for cyclists and that this needed to be addressed.</p> <p>The Plan should also address the gap in the coastal cycleway network between Meols and New Brighton where the National Cycle Network has to leave the coast and go around Leasowe, despite their being four hectares of the North Wirral Coastal Park available to accommodate it. Figure 3.4 Tourism Assets on P74 of the Plan shows the gap in the network at this points. Policy CREC-SA8.1 (North Wirral Coastal Park) has no requirements to improve active travel infrastructure despite it being a critical piece of green infrastructure connecting towns. 175 of the NPPF states that Local Plans should take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure.</p> <p>We believe dedicated cycling infrastructure is essential to ensure it becomes a genuine commuting and school run option, rather than a high risk pursuit for enthusiasts. There are good examples across northern Europe that when high quality family-friendly cycling infrastructure is put in place (especially not mixing up cycles in the same carriageway as busy traffic, buses and HGVs) then a material modal shift takes place for essential trips. This requires cycleways to generally run through green spaces and in protected street corridors.</p>
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability	

Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Amend policy to take account of the need for local cycling infrastructure. Within the Hoylake NDP area, show a cycleway from the existing route alongside the railway, up Kings Gap then along North Parade.</p> <p>Add proposed strategic cycleway link along the coast through the North Wirral Country Park to connect that gap in the network, subject to feasibility work.</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>Hoylake Vision Community Planning Forum is an active Neighbourhood Planning qualifying body that has prepared the Hoylake Neighbourhood Development Plan and is currently reviewing it. It can provide a valuable perspective on Local Plan matters and wishes to engage positively with the examination.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

Comment ID	LPSD-427
Person ID	1323700
Include files	
Consultee Name	Mr Thomas Hutchinson
Position	Management Group representative
Company / Organisation	Hoylake Vision Community Planning Forum
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 6.1
Title	Placemaking Principles
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 6.1
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Insufficient reference to street trees. The NPPF (paragraph 131) states that planning should ensure that new streets are tree-lined because they make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change.

omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of	Amend criterion 7 as follows: conserve and positively enhance trees, landscapes, habitats and biodiversity and provide appropriate green and blue infrastructure including landscaping, tree-lined streets and amenity space including giving consideration to the use of communal space for growing food;

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-428
Person ID	1323700
Include files	
Consultee Name	Mr Thomas Hutchinson
Position	Management Group representative
Company / Organisation	Hoylake Vision Community Planning Forum
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 7.1
Title	Design Principles
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 7.1
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	The design principles of Policy 7.1 should include a criterion to safeguard and enhance the historic environment. Whilst the placemaking policy WS 6 the historic environment, WS 7.1 is intended to be a comprehensive list of the most important design considerations for the sustainable growth of the Wirral. Impact on built heritage is one of the key considerations for assessing development proposals as set out in the NPPF paragraph 194; so without it the policy is deficient.

omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of	Add criterion to Policy WS 7.1: ensures that the historic environment is safeguarded and enhanced;

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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LPSD-429

Comment ID	LPSD-429
Person ID	1323700
Include files	LPSD-429-PDF-HUTCHINSON-REDACTED.pdf
Consultee Name	Mr Thomas Hutchinson
Position	Management Group representative
Company / Organisation	Hoylake Vision Community Planning Forum
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 6.3
Title	Masterplan Areas
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 6.3
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer to attachment. NPPF para 82 states, in relation to building a strong, competitive economy, that planning policies should seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices, and to enable a rapid response to changes in economic circumstances. The mixed use area at Hoylake's Carr Lane, which contains the only industrial estate in West Wirral, currently suffers from barriers to investment related to its connectivity, inadequate infrastructure and poor environment.

The area needs planning policies that provide flexibility for changes in business practices and can create synergies with the District Centre, which is limited by its linear form and general lack of large sites. A new 2-screen cinema has recently been approved as part of the Beacon Arts Village development at the Carr Lane end of the District Centre which presents an opportunity to reimagine how the Carr Lane area looks and functions.

Hoylake Vision's local engagement exercises in 2020 (Engagement summary report enclosed) and 2022 found that local people saw a need to improve the appearance of the houses, streets and green spaces in the Carr Lane area. People thought there was a lack of clarity on the function of the area and said a clearer separation between industry and housing was needed. Respondents talked about planning for a change in the type of businesses in Carr Lane. In particular, they pointed out that existing companies are focused on petrol / diesel engine vehicles and would like to encourage new technology businesses to replace them as electric vehicle use becomes more mainstream.

People asked for affordable, new and attractive housing to be built. Respondents talked about increasing businesses and sports facilities, suggesting developing these activities would improve the connection of the estate with the rest of the town. A centre providing activities, education and protection of the environment on the green area behind Carr Lane

Other community ideas related to the green spaces situated beyond the Carr Lane estate. The most popular idea was to explore better ways to use green land behind Carr Lane such as centre providing activities, education and protection of the environment. There have been proposals to include the Ellerman Lines Cricket Ground as a potential site for a Wildfowl and Wetlands Visitor Centre as well as opportunities for redevelopment of housing and industry in the Carr Lane area. There was a desire for connections with and development of sports already in the area such as the golf course, football pitch and rugby club. A play area and a skate park or other activity type for young people were also popular ideas.

People also wanted a solution to the access issues caused by the rail crossing. The rail crossing was considered unsafe. The system causes traffic delays, and as a result, the area is isolated from the rest of the town. This can be particularly problematic when emergency services struggle to access the area. Some people asked for a bridge or a footbridge and more pedestrian crossings. Creating another access route to the town centre would open up the area. The suggestion of a road linking the area to the rest of the town to avoid the railway crossing received positive votes.

Many of these suggestions will require a masterplanning exercise involving a range of stakeholders; it is beyond the remit of the Community Forum to deliver.

Hoylake Carr Lane currently contains an industrial estate, housing, RAF air cadet training corps, gymnasium and charitable foundation with plans to create a rehabilitation and youth development centre (<https://utsfoundation.com>). It adjoins derelict land in the Green Belt with potential for outdoor recreation centre linked to wildlife and wetlands. As the area sits next to a rail station just 25 minutes ride away from Liverpool City Centre and 22 minutes from Birkenhead City Centre it clearly has potential for masterplanned growth.

This area grew up in the twentieth century to take uses that could not be accommodated within the rest of the town. It was formerly the local tip and railway sidings and grew in a haphazard way, with poorly planned juxtapositions of uses typical of the urban fringe. Whilst most of the area is a general industrial estate serving the wider area (including the rest of West Wirral, which lacks any other industrial sites), part of it was built as Council housing, isolated from the rest of the town. It is in desperate need of regeneration and requires Wirral Council's leadership and resources to deliver given the technical complexities it needs to address. A Local Plan policy for a masterplan is required, akin to MPA-SA6.1 for West Kirby Concourse, which involves the Council engaging landowners, business, the local community and other key partners.

Policy CL2 of the made Neighbourhood Plan designates a comprehensive redevelopment area that includes both the housing and the employment land. It seeks improvement in the living conditions of existing residents and ensuring that the long term needs of businesses would be catered for. However this policy is ignored by the new Local Plan even though NPPG states that the local planning authority should work with the qualifying Neighbourhood Plan body so that complementary neighbourhood and local plan policies are produced and that it is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging local plan (Paragraph: 009 Reference ID: 41-009-20190509). The transformation of the Carr Lane area is also an important element in the emerging work on the replacement Neighbourhood Plan and the consultation process with regard to the draft 'Masterplan' and draft 'Design Guide and Codes' documents.

As a result, no consideration in the emerging Local Plan appears to have been given to making better use of land, imagining a new arrangement of residential and employment activities or bringing in other uses. Instead, The Local Plan simply proposed designating a standard restrictive employment area for the industrial estate, a standard open space protection for the underused open space and a standard residential policy for the existing housing (and adjacent vacant land). These inflexible designations will essentially fix the current unsatisfactory spatial arrangements and make it harder to re-imagine a better neighbourhood.

There is also no provision in the Local Plan for remediating the derelict land in the Green Belt (the 'Ellerman Lines' former cricket ground site where material has been dumped on the site and left unrestored) and the landscape renewal policies of the UDP for this area (LA3, LA4) are to be removed without the problem having been dealt with. No provision is made for any kind of public realm or environmental improvements in and around the area, despite it immediately adjoining and visible from the rail station on one side and the open countryside on the other, with a Public Right of Way running through and a golf course which may in future be managed by the prestigious Royal Liverpool Golf Club under the terms of a Community Asset Transfer. Most importantly of all, no provision is made for addressing the severe access constraint which has limited the potential of the site for intensification and greater range of activities.

In the circumstances, we believe that an employment-led mixed use area is justified in accordance with the Local Plan's stated approach to provide employment-led development within appropriate mixed use areas (Policy WS 1.2). This would accord with the made Hoylake NDP designation and act as a catalyst for positive change, particularly in terms of consideration of new transport infrastructure. It accords with the Council's stated approach to masterplan production (paragraphs 3.151 - 3.154) in which it is recognised that where there are a number of different landowners and delivery agents, site specific proposals should be submitted in accordance with masterplans which consider how the area as a whole can be planned in a coordinated, cohesive and comprehensive manner. It also accords with the Council's stated intention to, where necessary, work with land owners, local communities, developers and other stakeholders to agree site assembly strategies for key brownfield sites including use of compulsory purchase powers (paragraph 4.7).

<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>New paragraph:</p> <p>The Carr Lane area of Hoylake has significant potential for a compact mixed use neighbourhood adjoining Hoylake rail station. Its primary focus will remain employment but diversification will be encouraged to integrate employment and housing more effectively and bringing in a wider mix of uses to complement and support the social and economic vitality of the District Centre and wider town. A Masterplan will be drawn up with the full involvement of local residents and businesses currently within the Carr Lane area.</p> <p>New policy:</p> <p>Hoylake Carr Lane Masterplan Area</p>

<p>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Development proposals within the Hoylake Carr Lane Masterplan Area shown on the Policies Map (ref) will be supported which are in conformity with a community-led Masterplan which has been endorsed by the Council and provide, as appropriate, for:</p> <ol style="list-style-type: none"> 1 improved access arrangements to address the severance/barrier effect of the railway line for vehicles, cyclists and pedestrians; and 2 enhancement of cycle and pedestrian routes into the surrounding countryside and greater opportunities for outdoor recreation and play; and 3 maintenance and enhancement of small and medium scale industrial and commercial activities to provide local employment in accordance with Policy WS 4; and 4 a greater mix of uses to include new community, health and leisure facilities where these would complement and support the uses within Hoylake District Centre and be compatible with the surrounding employment uses; and 5 improvement of the existing residential areas and integration of new residential development where this would be compatible with the surrounding employment uses; and 6 enhanced green infrastructure networks that protects existing open space for residents but also opens up new amenity and outdoor recreational opportunities; and 7 buildings of an appropriate scale and appearance that create an enhanced sense of place having regard to views from the town, adjacent railway station and surrounding countryside. <p>Consequential change to:</p> <p>Table 3.6 Settlement Areas, Regeneration Areas and Associated Masterplan Areas</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>Hoylake Vision Community Planning Forum is an active Neighbourhood Planning qualifying body that has prepared the Hoylake Neighbourhood Development Plan and is currently reviewing it. It can provide a valuable perspective on Local Plan matters and wishes to engage positively with the examination.</p>

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-430
Person ID	1323708
Include files	
Consultee Name	alex child
Position	
Company / Organisation	
Agent ID	1323706
Agent Name	alex child
Position	
Company / Organisation	
Number	Policy WS 3.3
Title	Affordable Housing Requirements
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.3
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>The Policy is underpinned by the Aspinall Verdi Viability update June 2022. Whilst there are a number of issues associated with that document in so far as it relates to retirement and extra care housing, critically in applying BCIS build costs, the study uses general housing build costs indices rather than those available and relating specifically to housing for older people such as retirement and Extra Care housing.</p> <p>With Build Costs increasing rapidly, it is imperative that those costs most appropriate to the form of development under consideration are applied so as to ensure that development remains viable. This is particularly important in the context of older persons housing as the SHMA identifies the need for 2332 units over the plan period equating to 93 units per year</p> <p>The difference in build cost is approximately #300 per sqm. When applied to a 55 unit retirement housing scheme as per the terms of the study, this adds approx # 1.050m to the base build cost and #1.8m to a 60 unit extra care scheme, making both schemes unviable</p>

omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of	That the policy be amended to exclude an affordable housing requirment from forms of retirement and Extra care housng on the basis of viability and that most need will be for private market housing.

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-431
Person ID	1323700
Include files	LPSD-431-Hutchinson Attach 2_Redacted.pdf LPSD-431-Hutchinson Attach 1 of 2_Redacted .pdf
Consultee Name	Mr Thomas Hutchinson
Position	Management Group representative
Company / Organisation	Hoylake Vision Community Planning Forum
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WP 6
Title	Policy for West Kirby and Hoylake
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	Paragraph 5.51
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please refer to attachment. Hoylake Vision Community Planning Forum ('the Forum') produced the Hoylake Neighbourhood Plan under the provisions of the Localism Act 2011. The Neighbourhood Plan came into force as a statutory part of the Council's Local Plan in December 2016 following a public referendum. One of the Forum's main soundness concerns with the Submission Draft Plan as whole is that it doesn't take sufficient account of the policies of the made Neighbourhood Plan. Paragraph 3.21 of the Submission Draft Plan claims the Local Plan seeks to reflect and

as precise as possible.

support rather than alter the local priorities set out in the Neighbourhood Plan for Hoylake. Yet the local priorities in the Hoylake Neighbourhood Plan are not properly reflected in the priorities listed in the priorities for West Kirby and Hoylake, nor do they always translate effectively into the policies for the Hoylake Neighbourhood Area. In particular there is no framework provided for the masterplanning of the Carr Lane area, which comprises employment, housing and derelict land.

Furthermore, as acknowledged in para 1.5 of the Submission Draft Plan, the adopted Local Plan will set out strategic policies which set the context for all development and any future Neighbourhood Plans. It provides a framework for more detailed guidance such as masterplans and design codes that demonstrate how large sites or areas should develop. The Forum believes there to be missing elements in the policies for the forthcoming update of the Neighbourhood Plan, across a range of policy areas. The Forum is keen for the Submission Draft Plan to incorporate the important priorities of the local community as expressed through the consultation work and the associated technical work and for this to be a main examination matter.

The Forum is currently preparing a replacement Plan and have already undertaken two consultations led by public engagement experts PLACED www.placedengagement.org.uk/hoylake. The first round of consultation took place in July to October 2020 and an Engagement Summary report has been produced. On the basis of community input to the 2020 consultation, the Hoylake Vision management group worked with consultants AECOM to produce a draft 'Masterplan' document and draft 'Design Guide and Codes' document for Hoylake in collaboration with AECOM and the Hoylake Conservation Areas Association. This document expands on some of the ideas in the Masterplan and sets out more detailed vision for three key areas: the Town Centre, the Promenade and the Carr Lane Area. A second round of consultation took place in 2022, the results of which are being analysed. Further consultation events are being planned.

The replacement of the Neighbourhood Plan has been delayed by the emerging Local Plan timetable. The Forum's intention has been to wait for the adoption of the Local Plan before updating the Neighbourhood Plan so that it aligns with it and supports the delivery of the strategic policies. So whilst the current Neighbourhood Planning work has no planning status yet, it provides evidence that should inform the Local Plan, in particular community aspirations and ambitions for what sustainable development means in the Hoylake context. The consultation versions of the Masterplan and Design Guide are attached for reference

Paragraph 16 of the NPPF is that Plans should be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees.

The Neighbourhood Plan can take the lead on non-strategic policies but it needs the Local Plan to provide the appropriate strategic policies, as neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area. The revised Neighbourhood Plan intends to set out detailed policies, including allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies.

This approach is in accordance with national planning policies in the NPPF, which state:

127. ...Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics. Neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and developers.

134. Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to:

- a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or
- b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

NPPG states (Paragraph: 002 Reference ID: 26-002-20191001) that local planning authorities are expected to effectively engage their local community when developing design policies. Appropriate policies can be included within non-strategic policies in neighbourhood plans and supplementary planning documents, such as local design guides, masterplans or design codes, which provide further detail on specific design matters.

Having regard to the above, the Forum's view is that more text is needed to reflect the content of the made the Hoylake NDP and the preferences of the community as expressed through the extensive work on the review of the Plan.

Bullet 1 - Support for the promotion of West Kirby and Hoylake as mixed use coastal resorts and tourist destinations but in terms of the mechanisms to achieve this, wording is needed on encouraging renewal and regeneration of underused and vacant sites and reference to masterplanning that does beyond just the one for the West Kirby Concourse.

Bullet 2 - Support for delivery of the local priorities identified within the Hoylake NDP but additional text is needed on the replacement Local Plan.

Bullet 7 – Hoylake District Centre is not just a neighbourhood centre serving everyday needs. It has a role as a service centre for the town and wider area as well as drawing in visitors in its role as a seaside resort. The emerging masterplan for Hoylake seeks to revitalise and reshape the underused and underperforming parts of the town to boost retail, leisure and sustainable tourism linked to its very special coastal location. The renovation of the Town Hall for a new cinema and leisure-based community hub is just one part of this process. Previous initiatives include the Council's investment in a bespoke public realm scheme for the high street linked to the 2006 Open Golf championship.

Bullet 8 – wording is needed on the need for a masterplan to address the wider issues of the Carr Lane area.

omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of	Proposed wording: Bullet 1 replace text with: Promote West Kirby and Hoylake as complementary mixed use urban coastal resorts and tourist destinations through land allocations, policies to encourage urban renewal and regeneration and the delivery of masterplans including West Kirby Concourse and Hoylake's Carr Lane Mixed Use Area. Bullet 2 replace text with: Support the delivery of the local priorities identified within the Hoylake NDP and any replacement Plan.

<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>Bullet 7 replace text with:</p> <p>Safeguard and enhance the vitality and viability of the District centre at Hoylake as the focus for shops, services and community facilities to serve the town and its visitors through Policy WD 11 and the Hoylake NDP.</p> <p>Bullet 8 replace text with:</p> <p>Maintain the employment function of the Carr Lane Mixed Use Area for small and medium scale businesses and encourage appropriate diversification of uses and improvements to access and the environment by the delivery of a masterplan.</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>Hoylake Vision Community Planning Forum is an active Neighbourhood Planning qualifying body that has prepared the Hoylake Neighbourhood Development Plan and is currently reviewing it. It can provide a valuable perspective on Local Plan matters and wishes to engage positively with the examination.</p>

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-432
Person ID	1323700
Include files	
Consultee Name	Mr Thomas Hutchinson
Position	Management Group representative
Company / Organisation	Hoylake Vision Community Planning Forum
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 11.2
Title	Hierarchy of Retail Centres
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 11.2
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>The wording is not precise enough and likely to inhibit investment in Hoylake compared to West Kirby. Referring to a an undefined 'district' level of shops, services and community facilities 'at a level above local centres' is not helpful. Instead wording based on the recently adopted Liverpool Local Plan should be used.</p> <p>There needs to be recognition of Hoylake's tourism function so leisure can be appropriate in its centre in accordance with para 3.236 that some centres have an important function to serve visitors as well as the permanently resident population. Paragraphs 5.45 and 5.49 of the Plan recognise their coastal resort function close to facilities and open spaces of strategic importance, so this should influence the policy for centres.</p> <p>West Kirby is focus for larger comparison stores and anchor supermarkets and a leisure centre. But health, community and leisure is just as appropriate in a District Centre as in a Town Centre, if of the right scale and type.</p>

Hoylake Vision's local engagement exercise in 2020 found that local people considered it paramount to have a vibrant, distinctive and diverse offer, including independent shops, hospitality offers and services.

The implications of the Covid-19 pandemic needs to be factored into the analysis on achieving sustainable communities, taking into account wider trends relating to new technology, changing lifestyles and how society respond to climate change. We believe this should be the starting point of any vision to 2037, rather than assuming an extrapolation of past trends.

Covid-19 has accelerated an existing trend for office workers seeking to avoid travelling to and from a central location at peak hours. Jobs are increasingly based around information and many people have now set themselves up with a home office and are routinely relying on ICT tools such as video conferencing. This is already impacting the vibrancy and 'buzz' of larger centres.

Covid-19 has also accelerated an existing trend away from shopping in person on a high street to online retail. At the same time there is a shift away from buying physical products to downloading and streaming entertainment. For people to want to take the trouble to come into a regional or sub-regional centre, the quality of the experience and the opportunities to socialise are going to be increasingly important. The advantage of higher order centres will be the range of places to eat and drink, the quality of the environment and the leisure facilities. Those places that cannot provide the excitement and level of entertainment that tourists would expect could suffer.

We suggest that the focus of the vision for Birkenhead should be on creating the range of leisure facilities that will draw people in, which should include major attractions. But also there needs to be a focus on supporting independent businesses to flourish rather than squeezing these out in favour of predictable corporate operators in standard formats. There also needs to be a strategy focuses on creating the conditions for the businesses to want to invest in Birkenhead which tackles the ownerships, rents, rates and range of premises. Coupled with that, there should be a complementary focus on public realm and urban design that provides something special and unique.

Beyond Birkenhead we believe there should be a similar focus on creating the conditions for independent businesses to thrive and how these can best serve the surrounding settlements. So again, a focus on food and drink and quality of environment but also retail that is locally sources and produced.

The focus of masterplanning should be on walkable, accessible neighbourhoods and Covid-19 has reinforced this. New housing needs to be within a walkable distances of a centre with a public transport node, which in most cases is about 800m.

For the new Plan there needs to be a recognition that people are not going to want to commute into higher order centres as much, as outlined above. We believe people will want to spend more times in their neighbourhoods and these should be able to respond to this by becoming more vibrant and offering more opportunities to meet, based around food and drink.

At the neighbourhood scale we believe we are on the cusp of a wave of decentralisation of employment that will enable people to live close to where they work. They will then be able to take advantage of the relatively peaceful neighbourhood environment, save on commuting time and achieve a better work/life balance. A big part of this shift will be underpinned by advances in renewable energy technology enabling people to work and travel without the CO2 impacts that is currently the case. We suggest that will have a number of implications for the way we plan new development.

Firstly, home workspace provision should become standard in new housing schemes, with an office space with a good outlook increasingly valuable. This trend should be seen in conjunction with an inevitable reduction in private care ownership as on-demand and autonomous vehicles transform the way we move about. As vehicular movement becomes app-driven and responsive to individual needs then there will be much less need to store private vehicles on-plot or even on-street. There will be dividend in terms of the development footprint that can be redirected away from vehicle storage towards stimulating economic activity such as working from home.

Secondly we would expect 'work hubs' to be demanded at the neighbourhood level for those with offices can share infrastructure and meeting spaces and have opportunities to socialise. Some businesses don't mix with home life easily and it often makes sense to share costs like administration, printing and meeting space.

Thirdly, we would expect manufacturing and storage to be increasingly integrated into neighbourhood and district centres. There will still be a role for the large sheds on dedicated employment sites but there will also be a need for smaller family and community businesses to make the products that they sell direct to local people. These places can become more vibrant and interesting by allowing affordable workshop space to co-exist with other uses. Linked to this will be the ability of green strategic infrastructure in and around communities to play a bigger role in providing economic benefits such as raw materials for food and manufacturing processes.

So, in relation to all these trends, we would expect a culture shift in terms of planning over the next 30 years, away from a sequential approach trying to direct most office uses into town centres and away from strict use class zoning. Employment co-existing with houses will become the norm. Instead of trying to micro-manage where businesses can locate, we would expect a liberalisation of development management, to focus on the big picture in relation to trends in technology and lifestyles. One of the key strands in this shift will be genuine localism, with communities being able to choose the planning framework that meets their needs rather than everything being squeezed into a one-size-fits-all top-down approach.

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

Yes

**Please give details of
why you consider the
Local Plan complies
with the duty to**

co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
<p>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</p>	<p>Proposed new wording for District and Local Centres.</p> <p>District Centres will be the primary focus for development and investment in shops, services, leisure and community uses outside town centres. A mix of uses will be supported to ensure vibrant and vital centres which meet the needs of the local communities that they serve, including visitors to tourist destinations where appropriate.</p> <p>Local Centres will be the focus for small scale shops and services appropriate to their role and function which is to serve the everyday needs of local communities.</p>

<p>incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>Hoylake Vision Community Planning Forum is an active Neighbourhood Planning qualifying body that has prepared the Hoylake Neighbourhood Development Plan and is currently reviewing it. It can provide a valuable perspective on Local Plan matters and wishes to engage positively with the examination.</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</p>	<p>Yes</p>

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

* Yes

* No

Comment ID	LPSD-433
Person ID	1323700
Include files	
Consultee Name	Mr Thomas Hutchinson
Position	Management Group representative
Company / Organisation	Hoylake Vision Community Planning Forum
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Appendix 8
Title	Parking Standards, Transport Assessment and Travel Plan Thresholds
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 7.4
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Two dedicated off-street spaces for every two-bed house likely to have unacceptable impact on design quality in many contexts. More clarification is required on the role of on-street parking and how this relates to the minimum density standards in the rest of the Plan. The removal of front gardens to create on-plot parking has had a severe impact on residential quality in Wirral, particularly in historic areas.

<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>More evidence needed from the Council to justify its parking standards, having regard to the minimum density policies which propose innovate family housing forms to get above 50 dwellings per hectare.</p>

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-434
Person ID	1323700
Include files	
Consultee Name	Mr Thomas Hutchinson
Position	Management Group representative
Company / Organisation	Hoylake Vision Community Planning Forum
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WP 6
Title	Policy for West Kirby and Hoylake
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	Paragraph 5.52
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Support for reference to the review of the Hoylake NDP. Add sentence to reflect emerging masterplan, design guides and codes.

<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>Add sentence:</p> <p>Development in the Hoylake NDP Area will take account relevant local policies and local design guidance in the Neighbourhood Plan and any associated local masterplan, design guide & codes.</p>

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-435
Person ID	1323700
Include files	
Consultee Name	Mr Thomas Hutchinson
Position	Management Group representative
Company / Organisation	Hoylake Vision Community Planning Forum
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WP 6
Title	Policy for West Kirby and Hoylake
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	Paragraph 5.45
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	The recognition of role of West Kirby and Hoylake as coastal resorts is supported but it should recognise this role as being of regional significance as in the Issues and Options Report (paragraph 6.53). Wording is also needed on the economic and social role these settlements play in the City Region especially informal leisure activities based on their distinctive built character and landscape setting.

omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of	Replace second sentence with: Hoylake and West Kirby also function as coastal resorts of regional significance, with provision for formal and informal recreation including golf, water sports and sand yachting. Add sentence: They also attract tourists, especially day trippers from other parts of the Liverpool City Region because of their scenic coastal location, family-friendly beaches, traditional promenades and buildings, food and drink establishments and opportunities for informal leisure e.g. walks around the Marine Lake and out to Red Rocks and the Hilbre Islands.

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-436
Person ID	1323700
Include files	
Consultee Name	Mr Thomas Hutchinson
Position	Management Group representative
Company / Organisation	Hoylake Vision Community Planning Forum
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Part 5
Title	Settlement Area Policies
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	Paragraph 5.46
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

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

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

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-437
Person ID	1323715
Include files	
Consultee Name	Mr Tom Edwards
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Part 1
Title	Introduction and Background
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	New brighton

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	No
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	Hidden within this proposal it is clear the council's intent to ruin precious greenbelt ground in and around New Brighton in the interest of lining the coffers and greasing palms. Wirral council are not fit for purpose and show complete disregard for local residents particularly for the long neglected town of new Brighton
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Their appears to be little intention to save new Brighton as a seaside resort. No protection for the popular new Brighton dips or long term plan for the arcades, fair and typical sea side entertainment facilities

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

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-438
Person ID	1323700
Include files	
Consultee Name	Mr Thomas Hutchinson
Position	Management Group representative
Company / Organisation	Hoylake Vision Community Planning Forum
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Appendix 7
Title	Urban Tourism Areas
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	TLR-SA6.1 Hoylake and Meols Waterfront Urban Tourism Area
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	Support for TLR-SA6.1 Hoylake and Meols Waterfront Urban Tourism Area which aligns with community preferences.
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	

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

<p>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>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>Hoylake Vision Community Planning Forum is an active Neighbourhood Planning qualifying body that has prepared the Hoylake Neighbourhood Development Plan and is currently reviewing it. It can provide a valuable perspective on Local Plan matters and wishes to engage positively with the examination.</p>

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-439
Person ID	1248472
Include files	LPSD-439-EM-Mellan Form 1 of 2 2207_Redacted.pdf LPSD-439,440,1396-EM-Mellan Attach 2207_Redacted.pdf
Consultee Name	Catesby Estates PLC
Position	
Company / Organisation	Catesby Estates
Agent ID	1248474
Agent Name	Mr. Niall Mellan
Position	Senior Planner
Company / Organisation	Hourigan Connolly
Number	Policy WS 1.1
Title	Homes
To which part of the Local Plan does this representation relate?	Policy
<ul style="list-style-type: none"> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment 	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1.1
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Policy WS1.1 is unsound because: It is not positively prepared and will not, as a minimum, meet the area's housing needs. It is not justified taking into account the reasonable alternatives presented in these submissions which suggest that exceptional circumstances exist to justify the release of land from the Green Belt and its allocation for housing.

as precise as possible.	<p>It is not effective in that it will not deliver the required amount of housing over the Plan period.</p> <p>It is not consistent with national policy in that insufficient housing will be delivered over the Plan period contrary to Paragraph 11 of the Framework. It is also contrary to Paragraphs 16 and 20 insofar as an aspirational strategy is proposed but it is not deliverable within the Plan period and will result in insufficient housing being delivered. It is also contrary to Paragraph 22 of the Framework in that strategic policies will not look ahead over a minimum 15 year period from adoption. Moreover, given the reliance on larger scale development policies should be set within a Vision that looks at least 30 years ahead in accordance with Paragraph 22 of the Framework. The Plan and Policy WS1.1 fails to do this and hence it is contrary to Paragraph 22 of the Framework.</p>
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	N/A
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	N/A

<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Our client's objections could be addressed through the following actions; although where noted we reserve our rights to make further observations on any new data published:</p> <ul style="list-style-type: none"> • The Plan period must have a minimum of 15 years from the date of adoption in line with national planning policy and hence the Plan period will need to be extended to at least 2040 given the time required for submission, Examination and adoption. • The dwelling contribution from Regeneration Areas should be considered over a 30 year period in line with an associated Vision, again this is entirely consistent with national planning policy. However, for the reasons outline herein the dwellings contribution from Regeneration Areas should be substantially reduced over the Plan period. • With a base date of 1 April 2021 for the Local Plan the Council will need to provide up-date information on completions and commitments to either 1 April 2022 or 1 April 2023; the data to be provided would be subject to the timing of the Examination. This information is essential to determine the minimum residual requirement to be met over the remaining Plan period. • Further clarification is sought with regard to commitments/allocations and an opportunity to comment on the data to ensure there is no double counting. • The windfall allowance should be reduced by 30 dwellings per annum for the first three years from adoption to avoid double counting commitments. • Our client's land should be removed from the Green Belt, not designated as an Area of Special Landscape Value, included within the Settlement Area and allocated for residential development (circa 250 dwellings) and community uses as identified in Appendix 2. Additionally, the substantial amount of existing residential development at Riverbank Road, Seabank Road, Seafield Avenue, Hilbre Avenue, Closeburn Avenue, Manners Lane, Marine Drive, Park West and Davenport Road should also be removed from the Green Belt and included within the Settlement Area for Heswall.
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>We wish to participate in the Examination because we have significant objections to the Local Plan including objections to the components of supply the Council relies upon to achieve the housing requirement. Our client controls land at Heswall which is an ideal site to be released from the Green Belt and allocated for housing. Having regard to the foregoing we wish the inspector to consider our objections via an oral hearing. We also wish to have the opportunity to address any topic papers and Hearing Statements produced by the Council in response to our objections.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

Comment ID	LPSD-440
Person ID	1248472
Include files	LPSD-439,440,1396-EM-Mellan Attach 2207_Redacted.pdf LPSD-440,1396-EM-Mellan Form 2 of 2 2207_Redacted.pdf
Consultee Name	Catesby Estates PLC
Position	
Company / Organisation	Catesby Estates
Agent ID	1248474
Agent Name	Mr. Niall Mellan
Position	Senior Planner
Company / Organisation	Hourigan Connolly
Number	Policy WP 8.1
Title	Green Belt
To which part of the Local Plan does this representation relate?	Policies Map
* Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	Heswall SW Map 3 of 4
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	The proposed designation is unsound because it is not justified taking into account reasonable alternatives i.e. the land should not be designated as Green Belt as exceptional circumstances exist to justify the release of Green Belt land for housing.

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.	N/A
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	N/A
Please set out the modification(s) you consider necessary to make the Local	<p>The land should be removed from the Green Belt, not included within the Area of Special Landscape Value, included within the Settlement Area and allocated for residential development (circa 250 dwellings) and community uses as identified in Appendix 2.</p> <p>Additionally, the substantial amount of existing residential development at Riverbank Road, Seabank Road, Seafeld Avenue, Hilbre Avenue, Closeburn Avenue, Manners Lane, Marine Drive, Park West and Davenport Road should also be removed from the Green Belt and included within the Settlement Area for Heswall.</p>

<p>Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>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>We wish to participate in the Examination because we have significant objections to the Local Plan including objections to the components of supply the Council relies upon to achieve the housing requirement. Our client controls land at Heswall which is an ideal site to be released from the Green Belt and allocated for housing. Having regard to the foregoing we wish the inspector to consider our objections via an oral hearing. We also wish to have the opportunity to address any topic papers and Hearing Statements produced by the Council in response to our objections.</p>

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

Comment ID	LPSD-441
Person ID	1242183
Include files	LPSD-441-442-EM-Harris 0407_Redacted.pdf
Consultee Name	Leslie Harris
Position	
Company / Organisation	Natural Wirral
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 1.1
Title	Homes
To which part of the Local Plan does this representation relate?	Policy
<ul style="list-style-type: none"> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment 	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS1.1
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>The figures for the latest Census have now been published, which show an increase of c400 people in 11 years, which represents an increase of 0.1% over the 11 years!! This figure is borne out by the councils own Compendium of Statistics and the ONS figures.</p> <p>So, one has to question where the council's figures of 12,000+ comes from. In fact, there are now several sets of building requirements up to 19,000 homes. Which is to be believed?</p> <p>The council have stated that the Government has 'dictated' the housing need for the Wirral, but we are yet to see a 'hard copy' directive from the Government!!</p> <p>Over these 11 years there has been a push on new house building across Wirral's Greenbelt, so much so the it has fulfilled the housing requirements.</p>

	<p>The figures put forward in this local plan have been discredited by Professor Ludi Simpson(Manchester University) and Professor David Gregg. as the council used the outdated 2014 methodology when more up to date figures should have been used. Nor was this research included in the council's arrival figures!!!</p> <p>Therefore, one has to question the validity of this Local Plan??</p> <p>Looking at the Councils own Compendium of Statistics and the recent census. It is basically saying that we do not need new homes especially the fact that there are several thousand empty homes on the Wirral as well as office blocks not being used.</p>
<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	

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

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

Comment ID	LPSD-442
Person ID	1242183
Include files	LPSD-441-442-EM-Harris 0407_Redacted.pdf
Consultee Name	Leslie Harris
Position	
Company / Organisation	Natural Wirral
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 1
Title	The Development and Regeneration Strategy for Wirral 2021 - 2037
To which part of the Local Plan does this representation relate?	Policy
<ul style="list-style-type: none"> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment 	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS1.1
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Houses built on the Greenbelt are purely for the benefit of profit for the construction companies - built for 'Greed and not Need' The Wirral has some of the most deprived areas in the country. (this is recognised by MPs from all parties) How is building on the Greenbelt going to benefit these areas. They are stating that 'affordable' homes will be built. What is classed as affordable? 80% of the asking price on Wirral's Greenbelt? They really are trying to treat the population of Wirral as being stupid!!!

	For the last 5 years we have been advocating regeneration of the Wirral and building a social economic environment to create jobs in healthy surroundings. Most local authorities in the country have developed their water front, with great success. Wirral waterfront has not changed since King Edward granted the monks from Birkenhead permission for a ferry over the Mersey!!
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	Only develop brownfield land. Regenerate the waterfront.

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

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

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

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

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

Comment ID	LPSD-443
Person ID	1323731
Include files	LPSD-443-463-EM-Barton Attach 5 of 12-redacted.pdf
Consultee Name	Mrs Brigid Edwards
Position	
Company / Organisation	Taylor Wimpey
Agent ID	1323730
Agent Name	Mr Richard Barton
Position	
Company / Organisation	Avison Young
Number	Policy WS 1.1
Title	Homes
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1.1
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please see submitted representations prepared by Avison Young on behalf of Taylor Wimpey UK Limited for comments on the soundness of the Local Plan and specific comments on the draft policy. Refer to attachment (Land at Irby Farm) and Consortium response

as precise as possible.	Draft Policy WS 1.1 is not considered to be sound as it is not positively prepared, justified, effective or consistent with national policy for the reasons set out in Section 4 of these representations and the Consortium Soundness Representations provided at Appendix VI.
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	N/A
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	N/A
Please set out the modification(s) you consider necessary	Please see submitted representations prepared by Avison Young on behalf of Taylor Wimpey UK Limited for comments on the soundness of the Local Plan and specific comments on the draft policy.

<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>Appendix V1) The Soundness representations also suggests the considerable changes required to draft Policy WS 1.1 for it to meet the test of soundness. However, given the significance of this policy to the overall Local Plan strategy and the quantum of changes required, it will not be possible to rectify these fundamental soundness issues through the main modifications process.</p> <p>(Appendix V1) The Soundness representations also suggests the considerable changes required to draft Policy WS 1.1 for it to meet the test of soundness. However, given the significance of this policy to the overall Local Plan strategy and the quantum of changes required, it will not be possible to rectify these fundamental soundness issues through the main modifications process.</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>It is necessary for Avison Young to attend and participate in the examination, on behalf of Taylor Wimpey UK Limited, in order to discuss the technical evidence and strategy in relation to housing requirement and delivery and the need for Green Belt release.</p>

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

Comment ID	LPSD-444
Person ID	1323731
Include files	LPSD-443-463-EM-Barton Attach 5 of 12-redacted.pdf
Consultee Name	Mrs Brigid Edwards
Position	
Company / Organisation	Taylor Wimpey
Agent ID	1323730
Agent Name	Mr Richard Barton
Position	
Company / Organisation	Avison Young
Number	Policy WS 1.3
Title	Infrastructure
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1.3
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please see submitted representations prepared by Avison Young on behalf of Taylor Wimpey UK Limited for comments on the soundness of the Local Plan and specific comments on the draft policy. Refer to attachment (Irby Farm) and Consortium response

as precise as possible.	As set out in the Consortium Soundness representations, draft Policy WS 1.3 will fail to meet the tests of soundness as it is not positively prepared, effective or consistent with national policy. The issues with draft Policy WS 1.3 relate to the inconsistencies between the Infrastructure Delivery Plan and the CIL and Viability Assessment. This is a fundamental issue with the Local Plan's viability and will be difficult to rectify through the main modifications process
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	N/A
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	N/A
Please set out the modification(s) you consider necessary	Please see submitted representations prepared by Avison Young on behalf of Taylor Wimpey UK Limited for comments on the soundness of the Local Plan and specific comments on the draft policy.

<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>The issues with draft Policy WS 1.3 relate to the inconsistencies between the Infrastructure Delivery Plan and the CIL and Viability Assessment. This is a fundamental issue with the Local Plan's viability and will be difficult to rectify through the main modifications process</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>It is necessary for Avison Young to attend and participate in the examination, on behalf of Taylor Wimpey UK Limited, in order to discuss the technical evidence and strategy in relation to housing requirement and delivery and the need for Green Belt release.</p>

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

Comment ID	LPSD-445
Person ID	1323731
Include files	LPSD-443-463-EM-Barton Attach 5 of 12-redacted.pdf
Consultee Name	Mrs Brigid Edwards
Position	
Company / Organisation	Taylor Wimpey
Agent ID	1323730
Agent Name	Mr Richard Barton
Position	
Company / Organisation	Avison Young
Number	Policy WS 2
Title	Social Value
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 2
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please see submitted representations prepared by Avison Young on behalf of Taylor Wimpey UK Limited for comments on the soundness of the Local Plan and specific comments on the draft policy. Refer to attachment (Land at Irby farm) and Consortium response

as precise as possible.	The requirement to provide a social value statement does not align with the requirements of the NPPF which focuses on supporting communities health, social and cultural well-being and would be an unnecessary requirement given that planning applications already address the social benefits of schemes that would arise. Draft Policy WS 2 is not considered to be sound as it is not consistent with national policy for the reasons set out above and should be removed from the Local Plan Submission Draft.
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	N/A
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	N/A
Please set out the modification(s) you consider necessary	Please see submitted representations prepared by Avison Young on behalf of Taylor Wimpey UK Limited for comments on the soundness of the Local Plan and specific comments on the draft policy. Draft Policy WS 2 is not considered to be sound as it is not consistent with national policy for the reasons set out above and should be removed from the Local Plan Submission Draft.

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),

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

It is necessary for Avison Young to attend and participate in the examination, on behalf of Taylor Wimpey UK Limited, in order to discuss the technical evidence and strategy in relation to housing requirement and delivery and the need for Green Belt release.

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

Comment ID	LPSD-446
Person ID	1323731
Include files	LPSD-443-463-EM-Barton Attach 5 of 12-redacted.pdf
Consultee Name	Mrs Brigid Edwards
Position	
Company / Organisation	Taylor Wimpey
Agent ID	1323730
Agent Name	Mr Richard Barton
Position	
Company / Organisation	Avison Young
Number	Policy WS 3.1
Title	Housing Design Standards
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.1
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please see submitted representations prepared by Avison Young on behalf of Taylor Wimpey UK Limited for comments on the soundness of the Local Plan and specific comments on the draft policy. Refer to attachment (Land at Irby farm) and Consortium response

as precise as possible.	Overall, draft Policy WS 3.1 is not positively prepared, effective or consistent with nationally policy and therefore cannot be considered to be sound for the reasons set out above and within the supporting Consortium representations.
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	N/A
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	N/A
Please set out the modification(s) you consider necessary to make the Local	<p>Please see submitted representations prepared by Avison Young on behalf of Taylor Wimpey UK Limited for comments on the soundness of the Local Plan and specific comments on the draft policy.</p> <p>However, as set out under draft Policy WS 3.1, the evidence base does not robustly justify the requirement to be 'zero carbon ready by design' and as such should be removed from the drafted policy.</p>

<p>Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>The CIL and Viability Assessment should be updated to take account of costs so that viability is not overstated. The Council must then identify residential sites that can viably meet the requirements of draft Policy WS 3.1. Amendments are also required to the assessment of NDSS in the evidence base as well as updating and robustly justifying the requirements for other standards.</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>It is necessary for Avison Young to attend and participate in the examination, on behalf of Taylor Wimpey UK Limited, in order to discuss the technical evidence and strategy in relation to housing requirement and delivery and the need for Green Belt release.</p>

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

Comment ID	LPSD-447
Person ID	1323731
Include files	LPSD-443-463-EM-Barton Attach 5 of 12-redacted.pdf
Consultee Name	Mrs Brigid Edwards
Position	
Company / Organisation	Taylor Wimpey
Agent ID	1323730
Agent Name	Mr Richard Barton
Position	
Company / Organisation	Avison Young
Number	Policy WS 3.2
Title	Housing Density
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.2
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please see submitted representations prepared by Avison Young on behalf of Taylor Wimpey UK Limited for comments on the soundness of the Local Plan and specific comments on the draft policy. Refer to attachment (Land at Irby farm) and Consortium response

as precise as possible.	As set out in Section 4 of these representations, the Consortium representations discuss density in depth and establish that the Council has overestimated the densities achievable on sites within the urban area to artificially inflate the claimed supply.
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	N/A
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	N/A
Please set out the modification(s) you consider necessary to make the Local	<p>Please see submitted representations prepared by Avison Young on behalf of Taylor Wimpey UK Limited for comments on the soundness of the Local Plan and specific comments on the draft policy.</p> <p>The Council must reduce its required densities and identify additional sites that can be viably delivered in the Borough. Given the quantum of changes required, it will be difficult to address through the main modifications process.</p>

<p>Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>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>It is necessary for Avison Young to attend and participate in the examination, on behalf of Taylor Wimpey UK Limited, in order to discuss the technical evidence and strategy in relation to housing requirement and delivery and the need for Green Belt release.</p>

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

Comment ID	LPSD-448
Person ID	1323731
Include files	LPSD-443-463-EM-Barton Attach 5 of 12-redacted.pdf LPSD-448-EM-Barton Form 6 of 20_2207_Redacted.pdf
Consultee Name	Mrs Brigid Edwards
Position	
Company / Organisation	Taylor Wimpey
Agent ID	1323730
Agent Name	Mr Richard Barton
Position	
Company / Organisation	Avison Young
Number	Policy WS 3.3
Title	Affordable Housing Requirements
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.3

Please state which Site ID/Reference this representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is	Please see submitted representations prepared by Avison Young on behalf of Taylor Wimpey UK Limited for comments on the soundness of the Local Plan and specific comments on the draft policy. Refer to attachment (Land at Irby farm) and Consortium response

unsound. Please be as precise as possible.	
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	N/A
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	N/A
Please set out the modification(s) you consider necessary	Please see submitted representations prepared by Avison Young on behalf of Taylor Wimpey UK Limited for comments on the soundness of the Local Plan and specific comments on the draft policy.

<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>It is recommended that WBC undertake a robust assessment of its affordable housing need however, as the fundamental issues with draft Policy WS 3.3 relate to the Council's urban intensification strategy, it will not be possible to address these soundness issues through the main modifications process.</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>It is necessary for Avison Young to attend and participate in the examination, on behalf of Taylor Wimpey UK Limited, in order to discuss the technical evidence and strategy in relation to housing requirement and delivery and the need for Green Belt release.</p>

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

Comment ID	LPSD-449
Person ID	1323731
Include files	LPSD-443-463-EM-Barton Attach 5 of 12-redacted.pdf
Consultee Name	Mrs Brigid Edwards
Position	
Company / Organisation	Taylor Wimpey
Agent ID	1323730
Agent Name	Mr Richard Barton
Position	
Company / Organisation	Avison Young
Number	Policy WS 3.4
Title	Housing Mix
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.4
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please see submitted representations prepared by Avison Young on behalf of Taylor Wimpey UK Limited for comments on the soundness of the Local Plan and specific comments on the draft policy. Refer to attachment (Land at Irby farm) and Consortium response

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.	N/A
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	N/A
Please set out the modification(s) you consider necessary	Please see submitted representations prepared by Avison Young on behalf of Taylor Wimpey UK Limited for comments on the soundness of the Local Plan and specific comments on the draft policy.

<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>To address the issues raised in the Consortium's analysis, the Council would need to identify a significant number of developable sites outside of Regeneration Areas that can viably deliver family dwellings. Given the quantum of the recommended changes required to make this policy sound, it will not be possible to rectify these fundamental soundness issues through the main modifications process.</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>It is necessary for Avison Young to attend and participate in the examination, on behalf of Taylor Wimpey UK Limited, in order to discuss the technical evidence and strategy in relation to housing requirement and delivery and the need for Green Belt release.</p>

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

LPSP-450

Comment ID	LPSP-450
Person ID	1242183
Include files	LPSP-450 and 464-EM-Harris 0507_Redacted.pdf
Consultee Name	Leslie Harris
Position	
Company / Organisation	Natural Wirral
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 1.1
Title	Homes
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS1.1
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>The figures for the latest Census have now been published, which show an increase in Wirral population of c400 people in 11 years. This represents an increase of 0.1% over the 11 year period!!!</p> <p>This figure is borne out by the Councils Compendium of Statistics and the Governments Office of National Statistics. So, one has to question where the Councils figure of 12,000+ houses come from. I fact there are now several sets of figures ranging up to 19,000.</p>

	<p>Which figure is to be believed???</p> <p>The Council have said that the Government has dictated the housing figure for the Wirral but I have yet to see a 'hard copy' directive from the Government!!!</p> <p>Over these 11 years there has been a push on new housing development on Wirral Greenbelt, so much so it has literally fulfilled the housing need of the Wirral!</p> <p>The figures that have been put forward in the Local Plan have been discredited by Professor Ludi Simpson (Manchester University and Professor David Gregg, as the Council used out of date figures from the 2014 methodology when more up to date should have been used!! Nor was this research included in the Council's arrival figures!!</p> <p>Therefore, one has to question the validity of this Local Plan?</p>
<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in 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</p>	

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

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	