

<b>Comment ID</b>	LPSD-451
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSD-443-463-EM-Barton Attach 5 of 12-redacted.pdf</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WS 5.1
<b>Title</b>	Green and Blue Infrastructure Networks
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 5.1
<b>Please state which Site ID/Reference this</b>	

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

<b>as precise as possible.</b>	Taylor Wimpey have previously commented on Green and Blue Infrastructure in representations submitted in March 2021. These representations set out Taylor Wimpey's general support of the Council's proposed strategic approach to GBI and it is anticipated that the site would contribute towards GBI in some capacity, the details of which will be agreed with Officers at the appropriate time. Taylor Wimpey is fully committed to working collaboratively with the Council and other developers / landowners where appropriate to achieve this however would not support any unnecessarily burdensome requirements or standards for green and blue infrastructure on developments to the point that viability and deliverability is impacted.
<b>omplies with the Duty to co-operate</b> * Yes * No	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	N/A
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	N/A
<b>Please set out the modification(s) you</b>	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>consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the</b></p>	<p>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>

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

<b>Comment ID</b>	LPSD-452
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSD-443-463-EM-Barton Attach 5 of 12-redacted.pdf</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WS 5.4
<b>Title</b>	Ecological Networks
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 5.4
<b>Please state which Site ID/Reference this</b>	

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

<b>as precise as possible.</b>	The evidence base does not provide robust justification for why a 20% BNG requirement is set on Council owned land and given that the Environment Act considers 10% to be appropriate, so should Wirral.
<b>omplies with the Duty to co-operate</b> * Yes * No	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	N/A
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	N/A
<b>Please set out the modification(s) you consider necessary to make the Local</b>	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. It is recommended that the BNG requirement on Council owned land is reduced from 20% to 10%.



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

<b>Comment ID</b>	LPSD-453
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSD-443-463-EM-Barton Attach 5 of 12-redacted.pdf</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WS 5.9
<b>Title</b>	Evidence of approach
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 5.9
<b>Please state which Site ID/Reference this</b>	

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

<b>as precise as possible.</b>	This policy however does not provide detail any requirements to be met in it and is lacking detail. As such it is not considered to be sound as it is not positively prepared, justified, effective or consistent with national policy.
<b>omplies with the Duty to co-operate</b> * Yes * No	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	N/A
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	N/A
<b>Please set out the modification(s) you consider necessary to make the Local</b>	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. Due to lack of detail in policy, the policy should be deleted from Local Plan

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

<b>Comment ID</b>	LPSD-454
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSD-443-463-EM-Barton Attach 5 of 12-redacted.pdf</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WS 8.1
<b>Title</b>	Energy Hierarchy
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 8.1
<b>Please state which Site ID/Reference this</b>	



representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not 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 Taylor Wimpey would not support any policies that would unnecessarily or unreasonably threaten the viability or deliverability of housing sites.

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>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>It is Taylor Wimpey's view that a bespoke package of sustainable measures should be developed on a site-by-site basis, rather than setting out a 'one size fits all' approach. A robust and flexible mechanism should be added to the policy requirements whereby additional requirements and / or other requirements can be relaxed if viability is threatened.</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.

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)

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

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.

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

<b>Comment ID</b>	LPSD-455
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSD-443-463-EM-Barton Attach 5 of 12-redacted.pdf</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WS 8.2
<b>Title</b>	Sustainable Construction – Energy Efficiency, Overheating and Cooling, and Water Usage
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 8.2
<b>Please state which Site ID/Reference this</b>	

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

<b>as precise as possible.</b>	In addition, and in reference to Passivhaus standards, a clear framework for improving the energy efficiency of buildings is included as part of the Future Homes Standards, which from 2025, new homes built to the Future Homes Standard will have carbon dioxide emissions at least 75% lower than those built to current Building Regulations standards. Taylor Wimpey do not support an indiscriminate policy requirement to meet Passivhaus Standards.
<b>omplies with the Duty to co-operate</b> * Yes * No	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	N/A
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	N/A
<b>Please set out the modification(s) you consider necessary</b>	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. The Local Plan Sub

<p><b>to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>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>The Local Plan Submission Draft makes reference in draft Policy WS 8.2 to new buildings meeting Passivhaus standard, but then at draft Policy WS 8.8 under paragraph 3.192, it refers to meeting Future Homes Standards. It is unnecessary to refer to both set of standards and results in ineffective policy.</p> <p>It is recommended that reference to Passivhaus Standards is omitted from the Local Plan to enable an effective, sound policy.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the hearing session(s),</b></p>	<p>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><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      Yes</p> <p>*      No</p>	<p>Yes</p>

<b>Comment ID</b>	LPSD-456
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSD-443-463-EM-Barton Attach 5 of 12-redacted.pdf</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WS 8.4
<b>Title</b>	On site Renewable and Low Carbon Energy
<b>To which part of the Local Plan does this representation relate?</b>	Policy
<ul style="list-style-type: none"> <li>* Paragraph(s)</li> <li>* Policy</li> <li>* Site</li> <li>* Policies Map</li> <li>* Sustainability</li> <li>* Appraisal</li> <li>* Habitat</li> <li>* Regulations</li> <li>* Assessment</li> </ul>	
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 8.4
<b>Please state which Site ID/Reference this</b>	

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

<b>as precise as possible.</b>	As set out above, in general, Taylor Wimpey support ambitions for renewable and low energy carbon and has its own climate change target and is reducing the carbon footprint of its business and working with its suppliers to help bring about wider change. Taylor Wimpey would not support any policies that would unnecessarily or unreasonably threaten the viability or deliverability of housing sites.
<b>omplies with the Duty to co-operate</b> * Yes * No	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	N/A
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	N/A
<b>Please set out the modification(s) you consider necessary</b>	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.

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

<b>Comment ID</b>	LPSD-457
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSD-443-463-EM-Barton Attach 5 of 12-redacted.pdf</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WS 8.5
<b>Title</b>	Carbon Compensation through Renewable and Low Carbon Energy
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 8.5
<b>Please state which Site ID/Reference this</b>	

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



<b>as precise as possible.</b>	As set out above, in general, Taylor Wimpey support ambitions for renewable and low energy carbon and has its own climate change target and is reducing the carbon footprint of its business and working with its suppliers to help bring about wider change. Taylor Wimpey would not support any policies that would unnecessarily or unreasonably threaten the viability or deliverability of housing sites.
<b>omplies with the Duty to co-operate</b> * Yes * No	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	N/A
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	N/A
<b>Please set out the modification(s) you consider necessary</b>	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.

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)

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

<b>Comment ID</b>	LPSD-458
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSD-443-463-EM-Barton Attach 5 of 12-redacted.pdf</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WS 8.8
<b>Title</b>	Climate Change and Energy Statement
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 8.8
<b>Please state which Site ID/Reference this</b>	

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

<p><b>as precise as possible.</b></p>	<p>It is noted that paragraph 3.192 of the Local Plan Submission Draft sets out that the Energy and Climate Statement should include an explanation how the clauses in Policy WS 8 have been addressed. This includes part 'vi' which states 'the proposal to reduce carbon emissions beyond the Future Homes Standards and current Building Regulations through the energy efficient design of the site, buildings and services, and preferably a design for performance approach.'</p> <p>Taylor Wimpey understands that the Future Homes Standard will be introduced by 2025 and will require new build homes to be future-proofed with low carbon heating and world-leading levels of energy efficiency.</p> <p>Measures relating to energy efficiency in new development are being pursued, and will be introduced, at the national level, including the Future Homes Standard. Energy efficiency requirements for new homes are set by Part L (Conservation of Fuel and Power) and Part 6 of the Building Regulations. Consequently, any local level policies relating to energy efficiency in new housing could be superseded once the Building Regulations are amended and the Future Homes Standard has been introduced, however clearly draft Policy WS 8.8 has been prepared with these in mind, but seeks to go beyond what is required by these unadopted requirements which is overly onerous.</p> <p>In addition, it is possible that the Local Plan Submission Draft could be adopted before some of these updated regulations come into effect and this would not be acceptable for the following reasons:</p> <ul style="list-style-type: none"> <li>•It is unclear how the more onerous requirements will be achieved in practice;</li> <li>•The transition arrangements in the Building Regulations have been primarily designed to allow developers to prepare for achieving the new requirements; and</li> <li>•The Council's approach of speeding up this transition threatens the delivery and / or viability of housing as most developers are unlikely to be in a position ahead of 2025 to deliver the requirements viably.</li> </ul> <p>As such it is not considered to be sound as it is not justified, effective or consistent with national policy for the reasons set out above.</p>
<p><b>omplies with the Duty to co-operate</b>  * Yes  * No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	<p>N/A</p>

<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	<p>N/A</p>
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>Please 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 draft policy needs to provide further clarity on circumstances where regulations and standards referenced are superseded by new versions and should omit reference to going beyond standards which are yet to be adopted.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to</b></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>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>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>



<b>Comment ID</b>	LPSP-459
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSP-443-463-EM-Barton Attach 5 of 12-redacted.pdf</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WS 10.1
<b>Title</b>	Provision of Infrastructure
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 10.1
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not 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 (from para 5.74)

<p><b>as precise as possible.</b></p>	<p>Roger Hannah have prepared detailed representations for the Consortium with regards to viability and in particular, critiquing the Council's Infrastructure Delivery Plan ('IDP') (May 2022) (see Technical Paper 5 – Viability).</p> <p>This states that the IDP sets out a funding gap of £42.14m for essential transport infrastructure over the Plan Period that is said to be funded through developer contributions. In Aspinall Verdi appraisal, they state this is accounted for but there is no cost allowance for transport in the S106 breakdowns. Given that the IDP states the essential transport works will need to be funded through developer contributions, this is serious oversight in relation to policy costs. This means that the cost deficit across the typologies and strategic sites is much greater than assessed in the 2022 CIL and Viability Assessment. This miscalculation is a significant flaw and will mean that infrastructure required for the implementation of the Local Plan will not be delivered.</p> <p>The flaws of draft Policy WS 10.1 relate to the inconsistencies and miscalculations between the Infrastructure Delivery Plan and the CIL and Viability Assessment which is a fundamental issue with the whole Local Plan viability and therefore it will not be possible to rectify these soundness issues through the main modifications process.</p>
<p><b>omplies with the Duty to co-operate</b>  * Yes  * No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	N/A
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying</b></p>	N/A

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

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

<b>Comment ID</b>	LPSD-460
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSD-443-463-EM-Barton Attach 5 of 12-redacted.pdf</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WD 3
<b>Title</b>	Biodiversity and Geodiversity
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WD 3
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not 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 (from para 5.81)

<b>as precise as possible.</b>	There is a clear conflict within the Local Plan as currently drafted and part 'F' of draft Policy WD 3 should be consistent with paragraph 3.142 and require adequate provision to be made over a 30 year period, rather than in perpetuity.
<b>omplies with the Duty to co-operate</b> * Yes * No	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	N/A
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	N/A
<b>Please set out the modification(s) you consider necessary to make the Local</b>	<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>In order for the draft policy to be considered sound, reference to 'in perpetuity' needs to be omitted from the Local Plan and reference made to a 30 year period instead.</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.

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)

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

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.

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

<b>Comment ID</b>	LPSD-461
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSD-443-463-EM-Barton Attach 5 of 12-redacted.pdf</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WD 4.3
<b>Title</b>	Sustainable Drainage Systems (SuDS) and Natural Flood Management
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WD 4.3
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not 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 (FROM PARA 5.87) Taylor Wimpey is supportive in general of the use of SuDS where possible within new developments.

as precise as possible.	
<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
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><b>to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>it is noted that the policy should include reference to the relaxing of requirements on viability grounds with the policy text. It is important to include this mechanism to ensure there is a necessary scope for development to deviate from the policy requirements for practical and / or viability reasons. A robust and flexible mechanism should be added to the policy requirements whereby additional requirements and / or other requirements can be relaxed if viability is threatened.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the hearing session(s),</b></p>	<p>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><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      Yes</p> <p>*      No</p>	<p>Yes</p>

<b>Comment ID</b>	LPSD-462
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSD-443-463-EM-Barton Attach 5 of 12-redacted.pdf</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WD 18
<b>Title</b>	Health Impact Assessment
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WD 18
<b>Please state which Site ID/Reference this</b>	



representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not 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 (PARA 5.90)

<b>as precise as possible.</b>	The requirement of draft Policy WD 18 for a Health Impact Assessment for all residential development of 10 dwellings or more does not align with the PPG which suggests that a Health Impact Assessment is a useful tool when significant impacts are expected – it cannot be assumed that 10 dwellings would trigger a significant impact to health facilities and as such this policy is not considered to be sound as it is not consistent with national policy
<b>omplies with the Duty to co-operate</b> * Yes * No	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	N/A
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	N/A
<b>Please set out the modification(s) you consider necessary</b>	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. Policy WD18 should be omitted from the Local Plan.

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)

If you wish to participate in the 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.

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

LPSP-463

<b>Comment ID</b>	LPSP-463
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSP-443-463-EM-Barton Attach 5 of 12-redacted.pdf</a> <a href="#">LPSP-443-463-EM-Barton Attach 12 of 12_Redacted.pdf</a> <a href="#">LPSP-443-463-EM-Barton Attach 8 of 12-redacted.pdf</a> <a href="#">LPSP-443-463-EM-Barton Attach 7 of 12-redacted.PDF</a> <a href="#">LPSP-443-463-EM-Barton Attach 6 of 12-redacted.PDF</a> <a href="#">LPSP-443-463-EM-Barton Attach 4 of 12-redacted.PDF</a> <a href="#">LPSP-443-463-EM-Barton Attach 3 of 12-redacted.PDF</a> <a href="#">LPSP-443-463-EM-Barton Attach 2 of 12-redacted.PDF</a> <a href="#">LPSP-443-463-EM-Barton Attach 1 of 12-redacted.PDF</a> <a href="#">LPSP-443-463-EM-Barton Attach 9 of 12-redacted.pdf</a> <a href="#">LPSP-443-463-EM-Barton Attach 11 of 12_Redacted.pdf</a> <a href="#">LPSP-443-463-EM-Barton Attach 10 of 12-redacted.pdf</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WP 7.2
<b>Title</b>	Residential Sites
<b>To which part of the Local Plan does this representation relate?</b>	Policy
* Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	

<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WP 7.2
<b>Please state which Site ID/Reference this representation relates to.</b>	
<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b>	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy

<p>* <b>Not Positively Prepared</b></p> <p>* <b>Not Justified</b></p> <p>* <b>Not Effective</b></p> <p>* <b>Not Consistent with National Policy</b></p>	
<p><b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b></p>	<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>REFER TO CONSORTIUM RESPONSE AND ATTACHMENT (IRBY FARM) (FROM PARA 5.82) (Attachment 5 of 12)</p> <p>The site at Irby Farm is not included in draft Policy WP 7.2 as it is currently included within Settlement Area 8 'Rural Areas'. As discussed at length in these representations, there is serious concern with regards to the Council's approach to housing requirements, delivery and claimed supply. The Consortium's analysis has concluded that the total residential supply from the sources set out in draft Policy WS 1.1 is less than 8,000 dwellings, as opposed to the 16,332 claimed by the Council.</p>
<p><b>omplies with the Duty to co-operate</b></p> <p>* <b>Yes</b></p> <p>* <b>No</b></p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	N/A
<p><b>If you wish to make a separate representation, relating to legal compliance,</b></p>	N/A

<p>soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>Please 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 would therefore need to identify a significant number of additional deliverable and developable sites to address this shortfall. As such, Green Belt sites are required to meet the identified overall need in Wirra land provide a distribution of development that would properly meet those needs across the Borough, and not just in the East.</p> <p>The Local Plan Submission Draft in its current form cannot be found sound and fundamental changes are required including the identification of additional supply from the Green Belt. Overall, additional sites will be required to meet the housing requirements and the site should be included in draft Policy WP 7.2.</p> <p>(Irby Farm) should be included in draft Policy WP 7.2.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>  *      <b>No, I do not wish to</b></p>	<p>Yes, I wish to participate in hearing session(s)</p>



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

<b>Comment ID</b>	LPSD-464
<b>Person ID</b>	1242183
<b>Include files</b>	<a href="#">LPSD-450 and 464-EM-Harris 0507_Redacted.pdf</a>
<b>Consultee Name</b>	Leslie Harris
<b>Position</b>	
<b>Company / Organisation</b>	Natural Wirral
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 1.1
<b>Title</b>	Homes
<b>To which part of the Local Plan does this representation relate?</b>	Policy
<ul style="list-style-type: none"> <li>* Paragraph(s)</li> <li>* Policy</li> <li>* Site</li> <li>* Policies Map</li> <li>* Sustainability</li> <li>* Appraisal</li> <li>* Habitat</li> <li>* Regulations</li> <li>* Assessment</li> </ul>	
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS1.1
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	<p>Looking at the Council's own Compendium of Statistics and the results of the recent census. It is basically saying that we do not need to use Greenbelt for any house building. Especially as the Wirral has several thousand empty homes and office blocks not being used that could be converted.</p> <p>House built on Wirral's Greenbelt are purely for the benefit of profit for the construction companies - built for 'Greed and not for Need'</p>

	<p>The Wirral has some of the most deprived areas in the country which is recognised as such by members of Parliament, from all parties.</p> <p>How is building on the Greenbelt going to benefit these communities? The construction companies are advocating 'affordable houses will be built.</p> <p>What is classed as affordable - on Wirral's Greenbelt!! 80% of the asking price. They really are trying to treat the people of Wirral as stupid!!</p> <p>For the last 5 years, we have been advocating the regeneration of the Wirral and with proper planning to create a sustainable environment</p> <p>to develop a community that will create jobs, develop tourism and build on these areas of our historic and maritime past. Pouring concrete on the Greenbelt will not achieve this!!!</p> <p>Most authorities in the country have developed their waterfronts with great success.</p> <p>Wirral's waterfront has not changed since King Edward granted the monks in Birkenhead permission for a 'Ferry Across the Mersey'</p> <p>The Wirral is steeped in history from neolithic hunter gather settlements going back several thousand years, to Roman and Viking times and including the defining battle of Breuenburg said to have taken place at Bromborough on the Wirral.</p> <p>We are a peninsular on the Wirral bounded on 3 sides by the River Dee, River Mersey and the Irish Sea.</p> <p>The UN has stated that the world needs to set aside a third of land and sea to protect biodiversity. We on the Wirral will lose a lot of our natural resources if we allow the destruction of our Greenbelt. We also have very productive soil on our farmland that we will need if we are to develop</p> <p>our food production in light of shortages that are taking place due to current circumstances.</p> <p>This council has now stated that we need to utilise our brownfield sites first - in fact it should read brownfield only!!!! This has not been the case not too long ago!!!!</p> <p>Using the vastly inflated housing figure set out by the council will inevitably incur harm to the important environmental designations that protect land of significant importance in terms of Climate Emergency goals and any biodiversity net gain. It is time that Wirral Council turned its back on big business greed of housing developers and took more longterm responsibility in order to help us all.</p>
<b>omplies with the Duty to co-operate</b> * <b>Yes</b> * <b>No</b>	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	

<p>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</p>	<p>regenerate the water front</p>

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

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

\* **Yes**  
\* **No**

<b>Comment ID</b>	LPSD-465
<b>Person ID</b>	1247974
<b>Include files</b>	<a href="#">LPSD-465-EM-Pudge Form 1 of 5 2207_Redacted.pdf</a>
<b>Consultee Name</b>	Ms Fiona Pudge
<b>Position</b>	Planning Manager
<b>Company / Organisation</b>	Sport England
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 7.1
<b>Title</b>	Design Principles
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 7.1
<b>Please state which Site ID/Reference this representation relates to.</b>	



<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	Support. Part 6 of the Policy directly references 'Active Design' which is guidance prepared by Sport England to ensure all new or enhanced development create opportunities to encourage physical activity. Active Design is a key principle of Sport England's Strategy 'Uniting the Movement'. In using Active Design this policy complies with Section 8 of the NPPF 'Promoting Healthy and Safe Communities' and helps implement Sport England's Strategy and 'Planning for Sport' objectives.
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	

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

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

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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<b>Comment ID</b>	LPSD-466
<b>Person ID</b>	1247974
<b>Include files</b>	<a href="#">LPSD-466-EM-Pudge Form 2 of 5 2207_Redacted.pdf</a>
<b>Consultee Name</b>	Ms Fiona Pudge
<b>Position</b>	Planning Manager
<b>Company / Organisation</b>	Sport England
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 7.3
<b>Title</b>	Agent of Change
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 7.3
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> *        Yes *        No	Yes
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	Support. The policy reflects the requirements of para 187 of the NPPF and Sport England's Playing Fields Policy which seeks to ensure any development adjacent to playing fields does not prejudice the use of the playing field. This is either through blocking access into a playing field, or risk of ballstrike from the playing field onto or into the curtilage of the new development or access roads.
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *        Yes *        No	Yes
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> *        Not Positively Prepared *        Not Justified *        Not Effective *        Not Consistent with National Policy	
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	

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

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



<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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<b>Comment ID</b>	LPSD-467
<b>Person ID</b>	1247974
<b>Include files</b>	<a href="#">LPSD-467-EM-Pudge Form 3 of 5 2207_Redacted.pdf</a>
<b>Consultee Name</b>	Ms Fiona Pudge
<b>Position</b>	Planning Manager
<b>Company / Organisation</b>	Sport England
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 5.3
<b>Title</b>	Outdoor Sports Provision
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 5.3
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	Support. The policy reflects the requirements of paragraph 98 of the NPPF. The policy also reflects the recommendations of the Playing Pitch and Outdoor Sport Strategy which was carried out by the Council in partnership with Sport England, the National Governing Bodies of Sport, sports clubs and teams and sports providers. The policy also reflects the intent of Sport England's Planning for Sport objectives Provide and Enhance where evidence shows these are required.
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	

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

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

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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<b>Comment ID</b>	LPSD-468
<b>Person ID</b>	1247974
<b>Include files</b>	<a href="#">LPSD-468-EM-Pudge Form 4 of 5 2207_Redacted.pdf</a>
<b>Consultee Name</b>	Ms Fiona Pudge
<b>Position</b>	Planning Manager
<b>Company / Organisation</b>	Sport England
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 10.5
<b>Title</b>	Community, Sport, Leisure and Cultural Facilities
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 10.5
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> *        Yes *        No	Yes
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	Support. Part O of the policy is supported as it reflects the Sport England's Playing Fields Policy which requires playing field (and associated sports facilities) to be replaced prior to commencement of development. It should also be noted that the Playing Pitch and Outdoor Sport Strategy expresses significant deficiencies in pitch provision now and in the future to meet demand. Therefore, it is essential that any loss of playing field is replaced prior to commencement of development.
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *        Yes *        No	Yes
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> *        Not Positively Prepared *        Not Justified *        Not Effective *        Not Consistent with National Policy	
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	



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

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

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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<b>Comment ID</b>	LPSD-469
<b>Person ID</b>	1247974
<b>Include files</b>	<a href="#">LPSD-469-EM-Pudge Form 5 of 5 2207_Redacted.pdf</a>
<b>Consultee Name</b>	Ms Fiona Pudge
<b>Position</b>	Planning Manager
<b>Company / Organisation</b>	Sport England
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WS 10.6
<b>Title</b>	Open Space
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 10.6
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	Support. Part Q of the Policy is supported as it reflects the requirements of paragraph 98 of the NPPF. The policy also reflects the recommendations of the Playing Pitch and Outdoor Sport Strategy which was carried out by the Council in partnership with Sport England, the National Governing Bodies of Sport, sports clubs and teams and sports providers. The policy also reflects the intent of Sport England's Planning for Sport objectives Provide and Enhance where evidence shows these are required.
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	Yes
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	

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

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

<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>
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LPSP-470

<b>Comment ID</b>	LPSP-470
<b>Person ID</b>	1323779
<b>Include files</b>	<a href="#">LPSP-470-EM-Jones Form 1 of 6 2207_Redacted.pdf</a> <a href="#">LPSP-470,1326,1327,1328,1329,1330-EM-Jones Attach 2207_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Mathew Tudor-Owen
<b>Position</b>	
<b>Company / Organisation</b>	Anwyl Construction Company Ltd
<b>Agent ID</b>	1311725
<b>Agent Name</b>	Rachel Jones
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WP 4.2
<b>Title</b>	Residential Sites
<b>To which part of the Local Plan does this representation relate?</b>	Site
* Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat Regulations Assessment	
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this</b>	RES- SA 4.11

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 Anwyl Construction Company Limited for comments on the soundness of the Local Plan and specific comments on the draft policy.

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	Please see submitted representations prepared by Avison Young on behalf of Anwyl Construction Company Limited for comments on the soundness of the Local Plan and specific comments on the draft policy.

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

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

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

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

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

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

It is necessary for Avison Young to attend and participate in the examination, on behalf of Anywl Construction Company Limited, in order to discuss the technical evidence and policy requirements

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

<b>Comment ID</b>	LPSD-471
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSD-471-490 and 1261-EM-Barton Attach 12 of 12 2207_Redacted.PDF</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WS 1.1
<b>Title</b>	Homes
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 1.1
<b>Please state which Site ID/Reference this</b>	

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

<b>as precise as possible.</b>	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.
<b>omplies with the Duty to co-operate</b> * Yes * No	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	N/A
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	N/A
<b>Please set out the modification(s) you consider necessary</b>	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><b>to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>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><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the hearing session(s),</b></p>	<p>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><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      Yes</p> <p>*      No</p>	<p>Yes</p>

<b>Comment ID</b>	LPSD-472
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSD-471-490 and 1261-EM-Barton Attach 12 of 12 2207_Redacted.PDF</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WS 1.3
<b>Title</b>	Infrastructure
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 1.3
<b>Please state which Site ID/Reference this</b>	

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

<b>as precise as possible.</b>	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
<b>omplies with the Duty to co-operate</b> * Yes * No	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	N/A
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	N/A
<b>Please set out the modification(s) you consider necessary</b>	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><b>to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>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><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the hearing session(s),</b></p>	<p>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><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      Yes</p> <p>*      No</p>	<p>Yes</p>

<b>Comment ID</b>	LPSD-473
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSD-471-490 and 1261-EM-Barton Attach 12 of 12 2207_Redacted.PDF</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WS 2
<b>Title</b>	Social Value
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 2
<b>Please state which Site ID/Reference this</b>	



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

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

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

If you wish to participate in the 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.

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

<b>Comment ID</b>	LPSD-474
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSD-471-490 and 1261-EM-Barton Attach 12 of 12 2207_Redacted.PDF</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WS 3.1
<b>Title</b>	Housing Design Standards
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 3.1
<b>Please state which Site ID/Reference this</b>	

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

<b>as precise as possible.</b>	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.
<b>omplies with the Duty to co-operate</b> * Yes * No	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	N/A
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	N/A
<b>Please set out the modification(s) you consider necessary to make the Local</b>	<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><b>Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>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><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the hearing session(s), please outline why</b></p>	<p>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><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>

<b>Comment ID</b>	LPSD-475
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSD-471-490 and 1261-EM-Barton Attach 12 of 12 2207_Redacted.PDF</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WS 3.2
<b>Title</b>	Housing Density
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 3.2
<b>Please state which Site ID/Reference this</b>	

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

<b>as precise as possible.</b>	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.
<b>omplies with the Duty to co-operate</b> * Yes * No	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	N/A
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	N/A
<b>Please set out the modification(s) you consider necessary to make the Local</b>	<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><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>

<b>Comment ID</b>	LPSD-476
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSD-471-490 and 1261-EM-Barton Attach 12 of 12 2207_Redacted.PDF</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WS 3.3
<b>Title</b>	Affordable Housing Requirements
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 3.3
<b>Please state which Site ID/Reference this</b>	

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



as precise as possible.	
<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
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	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><b>Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>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><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the hearing session(s), please outline why</b></p>	<p>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><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>

<b>Comment ID</b>	LPSD-477
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSD-471-490 and 1261-EM-Barton Attach 12 of 12 2207_Redacted.PDF</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WS 3.4
<b>Title</b>	Housing Mix
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 3.4
<b>Please state which Site ID/Reference this</b>	

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

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><b>to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>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><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the hearing session(s),</b></p>	<p>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><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      Yes</p> <p>*      No</p>	<p>Yes</p>



<b>Comment ID</b>	LPSD-478
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSD-471-490 and 1261-EM-Barton Attach 12 of 12 2207_Redacted.PDF</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WS 5.1
<b>Title</b>	Green and Blue Infrastructure Networks
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 5.1
<b>Please state which Site ID/Reference this</b>	

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

<b>as precise as possible.</b>	Taylor Wimpey have previously commented on Green and Blue Infrastructure in representations submitted in March 2021. These representations set out Taylor Wimpey's general support of the Council's proposed strategic approach to GBI and it is anticipated that the site would contribute towards GBI in some capacity, the details of which will be agreed with Officers at the appropriate time. Taylor Wimpey is fully committed to working collaboratively with the Council and other developers / landowners where appropriate to achieve this however would not support any unnecessarily burdensome requirements or standards for green and blue infrastructure on developments to the point that viability and deliverability is impacted.
<b>omplies with the Duty to co-operate</b> * Yes * No	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	N/A
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	N/A
<b>Please set out the modification(s) you</b>	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>consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the</b></p>	<p>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>

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

<b>Comment ID</b>	LPSD-479
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSD-471-490 and 1261-EM-Barton Attach 12 of 12 2207_Redacted.PDF</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WS 5.4
<b>Title</b>	Ecological Networks
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 5.4
<b>Please state which Site ID/Reference this</b>	

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

<b>as precise as possible.</b>	The evidence base does not provide robust justification for why a 20% BNG requirement is set on Council owned land and given that the Environment Act considers 10% to be appropriate, so should Wirral.
<b>omplies with the Duty to co-operate</b> * Yes * No	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	N/A
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	N/A
<b>Please set out the modification(s) you consider necessary to make the Local</b>	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. It is recommended that the BNG requirement on Council owned land is reduced from 20% to 10%.



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

<b>Comment ID</b>	LPSD-480
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSD-471-490 and 1261-EM-Barton Attach 12 of 12 2207_Redacted.PDF</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WS 5.9
<b>Title</b>	Evidence of approach
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 5.9
<b>Please state which Site ID/Reference this</b>	

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

<b>as precise as possible.</b>	This policy however does not provide detail any requirements to be met in it and is lacking detail. As such it is not considered to be sound as it is not positively prepared, justified, effective or consistent with national policy.
<b>omplies with the Duty to co-operate</b> * Yes * No	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	N/A
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	N/A
<b>Please set out the modification(s) you consider necessary to make the Local</b>	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. Due to lack of detail in policy, the policy should be deleted from Local Plan

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

<b>Comment ID</b>	LPSD-481
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSD-471-490 and 1261-EM-Barton Attach 12 of 12 2207_Redacted.PDF</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WS 8.1
<b>Title</b>	Energy Hierarchy
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 8.1
<b>Please state which Site ID/Reference this</b>	



representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not 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 Barnston Rd) and Consortium. Taylor Wimpey would not support any policies that would unnecessarily or unreasonably threaten the viability or deliverability of housing sites.

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>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>It is Taylor Wimpey's view that a bespoke package of sustainable measures should be developed on a site-by-site basis, rather than setting out a 'one size fits all' approach. A robust and flexible mechanism should be added to the policy requirements whereby additional requirements and / or other requirements can be relaxed if viability is threatened.</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><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>

<b>Comment ID</b>	LPSD-482
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSD-471-490 and 1261-EM-Barton Attach 12 of 12 2207_Redacted.PDF</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WS 8.2
<b>Title</b>	Sustainable Construction – Energy Efficiency, Overheating and Cooling, and Water Usage
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 8.2
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not 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 Consortium response and attachment (Land at Barnston Rd) the evidence base does not robustly justify the requirement to be 'zero carbon ready by design'

<b>as precise as possible.</b>	In addition, and in reference to Passivhaus standards, a clear framework for improving the energy efficiency of buildings is included as part of the Future Homes Standards, which from 2025, new homes built to the Future Homes Standard will have carbon dioxide emissions at least 75% lower than those built to current Building Regulations standards. Taylor Wimpey do not support an indiscriminate policy requirement to meet Passivhaus Standards.
<b>omplies with the Duty to co-operate</b> * Yes * No	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	N/A
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	N/A
<b>Please set out the modification(s) you consider necessary</b>	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><b>to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>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>The Local Plan Submission Draft makes reference in draft Policy WS 8.2 to new buildings meeting Passivhaus standard, but then at draft Policy WS 8.8 under paragraph 3.192, it refers to meeting Future Homes Standards. It is unnecessary to refer to both set of standards and results in ineffective policy.</p> <p>It is recommended that reference to Passivhaus Standards is omitted from the Local Plan to enable an effective, sound policy.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the hearing session(s),</b></p>	<p>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><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      Yes</p> <p>*      No</p>	<p>Yes</p>

<b>Comment ID</b>	LPSD-483
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSD-471-490 and 1261-EM-Barton Attach 12 of 12 2207_Redacted.PDF</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WS 8.4
<b>Title</b>	On site Renewable and Low Carbon Energy
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 8.4
<b>Please state which Site ID/Reference this</b>	

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

<b>as precise as possible.</b>	As set out above, in general, Taylor Wimpey support ambitions for renewable and low energy carbon and has its own climate change target and is reducing the carbon footprint of its business and working with its suppliers to help bring about wider change. Taylor Wimpey would not support any policies that would unnecessarily or unreasonably threaten the viability or deliverability of housing sites.
<b>omplies with the Duty to co-operate</b> * Yes * No	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	N/A
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	N/A
<b>Please set out the modification(s) you consider necessary</b>	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.

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)

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

<b>Comment ID</b>	LPSD-484
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSD-471-490 and 1261-EM-Barton Attach 12 of 12 2207_Redacted.PDF</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WS 8.5
<b>Title</b>	Carbon Compensation through Renewable and Low Carbon Energy
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 8.5
<b>Please state which Site ID/Reference this</b>	

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



<b>as precise as possible.</b>	As set out above, in general, Taylor Wimpey support ambitions for renewable and low energy carbon and has its own climate change target and is reducing the carbon footprint of its business and working with its suppliers to help bring about wider change. Taylor Wimpey would not support any policies that would unnecessarily or unreasonably threaten the viability or deliverability of housing sites.
<b>omplies with the Duty to co-operate</b> * Yes * No	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	N/A
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	N/A
<b>Please set out the modification(s) you consider necessary</b>	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.

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)

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

<b>Comment ID</b>	LPSD-485
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSD-471-490 and 1261-EM-Barton Attach 12 of 12 2207_Redacted.PDF</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WS 8.8
<b>Title</b>	Climate Change and Energy Statement
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 8.8
<b>Please state which Site ID/Reference this</b>	

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

<p><b>as precise as possible.</b></p>	<p>It is noted that paragraph 3.192 of the Local Plan Submission Draft sets out that the Energy and Climate Statement should include an explanation how the clauses in Policy WS 8 have been addressed. This includes part 'vi' which states 'the proposal to reduce carbon emissions beyond the Future Homes Standards and current Building Regulations through the energy efficient design of the site, buildings and services, and preferably a design for performance approach.'</p> <p>Taylor Wimpey understands that the Future Homes Standard will be introduced by 2025 and will require new build homes to be future-proofed with low carbon heating and world-leading levels of energy efficiency.</p> <p>Measures relating to energy efficiency in new development are being pursued, and will be introduced, at the national level, including the Future Homes Standard. Energy efficiency requirements for new homes are set by Part L (Conservation of Fuel and Power) and Part 6 of the Building Regulations. Consequently, any local level policies relating to energy efficiency in new housing could be superseded once the Building Regulations are amended and the Future Homes Standard has been introduced, however clearly draft Policy WS 8.8 has been prepared with these in mind, but seeks to go beyond what is required by these unadopted requirements which is overly onerous.</p> <p>In addition, it is possible that the Local Plan Submission Draft could be adopted before some of these updated regulations come into effect and this would not be acceptable for the following reasons:</p> <ul style="list-style-type: none"> <li>•It is unclear how the more onerous requirements will be achieved in practice;</li> <li>•The transition arrangements in the Building Regulations have been primarily designed to allow developers to prepare for achieving the new requirements; and</li> <li>•The Council's approach of speeding up this transition threatens the delivery and / or viability of housing as most developers are unlikely to be in a position ahead of 2025 to deliver the requirements viably.</li> </ul> <p>As such it is not considered to be sound as it is not justified, effective or consistent with national policy for the reasons set out above.</p>
<p><b>omplies with the Duty to co-operate</b>  * Yes  * No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	<p>N/A</p>

<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	<p>N/A</p>
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>Please 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 draft policy needs to provide further clarity on circumstances where regulations and standards referenced are superseded by new versions and should omit reference to going beyond standards which are yet to be adopted.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to</b></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>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>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>



<b>Comment ID</b>	LPSD-486
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSD-471-490 and 1261-EM-Barton Attach 12 of 12 2207_Redacted.PDF</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WS 10.1
<b>Title</b>	Provision of Infrastructure
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WS 10.1
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not 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 Consortium response and attachment (Land at Barnston Rd) (from para 5.74)

<p><b>as precise as possible.</b></p>	<p>Roger Hannah have prepared detailed representations for the Consortium with regards to viability and in particular, critiquing the Council's Infrastructure Delivery Plan ('IDP') (May 2022) (see Technical Paper 5 – Viability).</p> <p>This states that the IDP sets out a funding gap of £42.14m for essential transport infrastructure over the Plan Period that is said to be funded through developer contributions. In Aspinall Verdi appraisal, they state this is accounted for but there is no cost allowance for transport in the S106 breakdowns. Given that the IDP states the essential transport works will need to be funded through developer contributions, this is serious oversight in relation to policy costs. This means that the cost deficit across the typologies and strategic sites is much greater than assessed in the 2022 CIL and Viability Assessment. This miscalculation is a significant flaw and will mean that infrastructure required for the implementation of the Local Plan will not be delivered.</p> <p>The flaws of draft Policy WS 10.1 relate to the inconsistencies and miscalculations between the Infrastructure Delivery Plan and the CIL and Viability Assessment which is a fundamental issue with the whole Local Plan viability and therefore it will not be possible to rectify these soundness issues through the main modifications process.</p>
<p><b>omplies with the Duty to co-operate</b>  * Yes  * No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	N/A
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying</b></p>	N/A

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

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

<b>Comment ID</b>	LPSD-487
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSD-471-490 and 1261-EM-Barton Attach 12 of 12 2207_Redacted.PDF</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WD 3
<b>Title</b>	Biodiversity and Geodiversity
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WD 3
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not 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 Consortium response and attachment (Land at Barnston Rd) (from para 5.85)

<b>as precise as possible.</b>	There is a clear conflict within the Local Plan as currently drafted and part 'F' of draft Policy WD 3 should be consistent with paragraph 3.142 and require adequate provision to be made over a 30 year period, rather than in perpetuity.
<b>omplies with the Duty to co-operate</b> * Yes * No	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	N/A
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	N/A
<b>Please set out the modification(s) you consider necessary to make the Local</b>	<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>In order for the draft policy to be considered sound, reference to 'in perpetuity' needs to be omitted from the Local Plan and reference made to a 30 year period instead.</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><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      <b>Yes</b></p> <p>*      <b>No</b></p>	<p>Yes</p>

<b>Comment ID</b>	LPSD-488
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSD-471-490 and 1261-EM-Barton Attach 12 of 12 2207_Redacted.PDF</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WD 4.3
<b>Title</b>	Sustainable Drainage Systems (SuDS) and Natural Flood Management
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WD 4.3
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not 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 CONSORTIUM RESPONSE AND ATTACHMENT (FROM PARA 5.91) Taylor Wimpey is supportive in general of the use of SuDS where possible within new developments.

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><b>to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>it is noted that the policy should include reference to the relaxing of requirements on viability grounds with the policy text. It is important to include this mechanism to ensure there is a necessary scope for development to deviate from the policy requirements for practical and / or viability reasons. A robust and flexible mechanism should be added to the policy requirements whereby additional requirements and / or other requirements can be relaxed if viability is threatened.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the hearing session(s),</b></p>	<p>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><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      Yes</p> <p>*      No</p>	<p>Yes</p>

<b>Comment ID</b>	LPSD-489
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSD-471-490 and 1261-EM-Barton Attach 12 of 12 2207_Redacted.PDF</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WD 18
<b>Title</b>	Health Impact Assessment
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WD 18
<b>Please state which Site ID/Reference this</b>	



representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not 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 Consortium response and attachment (Land at Barnston Road) (para 5.94)

<b>as precise as possible.</b>	The requirement of draft Policy WD 18 for a Health Impact Assessment for all residential development of 10 dwellings or more does not align with the PPG which suggests that a Health Impact Assessment is a useful tool when significant impacts are expected – it cannot be assumed that 10 dwellings would trigger a significant impact to health facilities and as such this policy is not considered to be sound as it is not consistent with national policy
<b>omplies with the Duty to co-operate</b> * Yes * No	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	N/A
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	N/A
<b>Please set out the modification(s) you consider necessary</b>	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. Policy WD18 should be omitted from the Local Plan.

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

LPSD-490

<b>Comment ID</b>	LPSD-490
<b>Person ID</b>	1323731
<b>Include files</b>	<a href="#">LPSD-471-490 and 1261-EM-Barton Attach 12 of 12 2207_Redacted.PDF</a> <a href="#">LPSD-490-EM-Barton Attach 2 of 12 2207_Redacted.PDF</a> <a href="#">LPSD-490-EM-Barton Attach 3 of 12 2207_Redacted.PDF</a> <a href="#">LPSD-490-EM-Barton Attach 4 of 12 2207_Redacted.PDF</a> <a href="#">LPSD-490-EM-Barton Attach 5 of 12 2207_Redacted.PDF</a> <a href="#">LPSD-490-EM-Barton Attach 6 of 12 2207_Redacted.PDF</a> <a href="#">LPSD-490-EM-Barton Attach 7 of 12 2207_Redacted.PDF</a> <a href="#">LPSD-490-EM-Barton Attach 8 of 12 2207_Redacted.PDF</a> <a href="#">LPSD-490-EM-Barton Attach 9 of 12 2207_Redacted.PDF</a> <a href="#">LPSD-490-EM-Barton Attach 10 of 12 2207_Redacted.PDF</a> <a href="#">LPSD-490-EM-Barton Attach 1 of 12 2207_Redacted.PDF</a> <a href="#">LPSD-490-EM-Barton Attach 11 of 12 2207_Redacted.PDF</a>
<b>Consultee Name</b>	Mrs Brigid Edwards
<b>Position</b>	
<b>Company / Organisation</b>	Taylor Wimpey
<b>Agent ID</b>	1323730
<b>Agent Name</b>	Mr Richard Barton
<b>Position</b>	
<b>Company / Organisation</b>	Avison Young
<b>Number</b>	Policy WP 7.2
<b>Title</b>	Residential Sites
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy

<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WP 7.2
<b>Please state which Site ID/Reference this representation relates to.</b>	
<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b>	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy

<p>* <b>Not Positively Prepared</b></p> <p>* <b>Not Justified</b></p> <p>* <b>Not Effective</b></p> <p>* <b>Not Consistent with National Policy</b></p>	
<p><b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b></p>	<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>REFER TO CONSORTIUM RESPONSE AND ATTACHMENT (FROM PARA 5.82) (Attachment 12 of 12)</p> <p>The site at Barnston Road is not included in draft Policy WP 7.2 as it is currently included within Settlement Area 8 'Rural Areas'. As discussed at length in these representations, there is serious concern with regards to the Council's approach to housing requirements, delivery and claimed supply. The Consortium's analysis has concluded that the total residential supply from the sources set out in draft Policy WS 1.1 is less than 8,000 dwellings, as opposed to the 16,332 claimed by the Council.</p>
<p><b>omplies with the Duty to co-operate</b></p> <p>* <b>Yes</b></p> <p>* <b>No</b></p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	N/A
<p><b>If you wish to make a separate representation, relating to legal compliance,</b></p>	N/A

<p>soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>Please 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 would therefore need to identify a significant number of additional deliverable and developable sites to address this shortfall. As such, Green Belt sites are required to meet the identified overall need in Wirra land provide a distribution of development that would properly meet those needs across the Borough, and not just in the East.</p> <p>The Local Plan Submission Draft in its current form cannot be found sound and fundamental changes are required including the identification of additional supply from the Green Belt. Overall, additional sites will be required to meet the housing requirements and the site should be included in draft Policy WP 7.2.</p> <p>(Land at Barnston Road) should be included in draft Policy WP 7.2.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>  *      <b>No, I do not wish to</b></p>	<p>Yes, I wish to participate in hearing session(s)</p>



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

<b>Comment ID</b>	LPSD-491
<b>Person ID</b>	1323285
<b>Include files</b>	<a href="#">LPSD-491-Longman Attach 1407_Redacted.pdf</a>
<b>Consultee Name</b>	Mr Derek Longman
<b>Position</b>	
<b>Company / Organisation</b>	Friends of Grange Hill
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WP 6.3
<b>Title</b>	Residential Sites
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	WP6.3
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Consistent with National Policy
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	FofGH Trustees are also active in encouraging community interest and access to the hill, engaging with multiple local bodies, schools, ward councillors and of course council officers. Most relevant in this regard is the centenary of the official opening of the War Memorial to take place in December 2022. The original ceremony in was officiated by the Earl of Birkenhead in front of a reported audience of over 5000 persons. Plans are now being made for celebrations to recognise this anniversary and the memorial restoration which is currently underway.  The War Memorial, whilst being a prominent landmark in West Wirral, sits in an area of green public space much enjoyed

	<p>by both locals and visitors from further afield. All appreciate the walks and the unique panoramic views available from the hill. Grange Hill 'land' was purchased by the old Hoylake UDC for the purpose of protecting it for the public to enjoy under Council ownership. There are protective restricted covenants on Grange Hill and privately owned land adjoining Grange Hill. Clearly these were put in place to protect this much-loved area.</p> <p>Against this background of local engagement, the residents of Grange Old Road (which sits adjacent to the entrance to Grange Hill), invited the FofGH Trust to their Residents Association meeting.</p> <p>The residents advised of the inclusion in Wirral Council's Draft Development Plan of a proposal to allow a housing development to be located on a sizeable area of land running from behind the properties on Old Grange Road to a point within sight and close proximity to the War Memorial.</p> <p>As you must be aware, this privately owned section of land adjoining Grange Hill consisting of some 3.5 acres has been put forward as a suggested site for new homes. According to documents / advice offered at a recent public meeting in West Kirby the residents understand this will accommodate between 35 to 50 properties.</p> <p>We share the local residents concern, that the inclusion of this land for new homes will be detrimental to Grange Hill. The FofGH have constantly been reminded by Wirral Council that as designated area of Local Wildlife Site (LWS) and Regionally Important Geomorphological Site (RIGS), the hill is an open area and a haven for wild life. We believe that the inevitable scale of infrastructure and suggested development would fundamentally change the character of the hill, resulting in a permanent detrimental impact.</p> <p>The residents of Grange Old Road are compiling substantive reasons why this proposal should not proceed, as they outlined at a recent FofGH Trustees meeting. The Trustees agreed to fully support the Residents of Grange Old Road.</p> <p>At this juncture may I record the disappointment of the Trustees of FofGH that, in view of our close association with Wirral Council and our considerable commitment to maintaining Grange Hill, we were not formally included in the Council's consultation process at the outset.</p>
<b>omplies with the Duty to co-operate</b> *        Yes *        No	No
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation,</b>	

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	Do not allocate RES SA6.4 in the Local Plan.

<p>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>	

<b>Comment ID</b>	LPSD-492
<b>Person ID</b>	1323589
<b>Include files</b>	<a href="#">LPSD-492-EM-Smith Attach 0507_redacted.pdf</a>
<b>Consultee Name</b>	Mr Fraser Smith & Caroline O'Callaghan
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WP 6.3
<b>Title</b>	Residential Sites
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	RES-SA6.4

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> *        Yes *        No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *        Yes *        No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> *        Not Positively Prepared *        Not Justified *        Not Effective *        Not Consistent with National Policy	Not Justified
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	Please refer to attachment We, Drs Fraser Mc Lean Smith and Caroline O'Callaghan strongly object to the inclusion of the land at Grange Hill in the Wirral Local plan 2021-2037. While some of us have made specific representations online into the local plan itself, we feel that the small scale of this development with respect to the enormity of the whole local plan will mean that our representations via the online portal will be "a needle in a haystack" and are likely to be overlooked. We have therefore also prepared this letter to draw the council's attention specifically to this matter. Aim of Wirral local plan 2021-37



The foreword, makes it very clear that the plan “sets out a range of policies that will help the whole of the Borough respond to climate change, protect our natural and built heritage assets, support high quality design and provide affordable homes that local people need”.

We will expand upon this mission statement, and how we feel that inclusion of this land is entirely unsuitable for inclusion for multiple reasons that we will highlight, in more detail and aligned to specific paragraphs of the local plan throughout this letter.

Brief background to other similar green spaces West Kirby in the recent past

It has only recently come to the attention of the direct local residents of Grange Old Road, and Friends of Grange Hill, both arguably the key local stakeholder groups, that this land, currently representing one of the last large areas of green space in West Kirby was ever being earmarked for development. West Kirby is a small, community centred village. The area to be developed is comparatively enormous, representing roughly 3.5 acres and is proposed to accommodate 35-50 houses, depending what documents one reads. It can only be accessed by Grange Old Road that is a narrow, short road, with a dangerous 90 degree bend which has no pavements in approximately half of it and is essentially single track for around two thirds of it. The road was annexed from Grange Road many years ago because it was an accident black spot. Currently the junctions of Grange Old Road (which would be essential to access the land), which now receives only minimal traffic, to Grange Road and Blackhorse Hill which are exceptionally busy main thoroughfares, are also accident black spots and are incredibly difficult and dangerous to navigate.

The land at Grange Hill is currently protected from development by a restrictive covenant filed as recently as 1985. We have only recently been made aware that an application is to be made to have this lifted, that will then enable it to be fully developed to the extent as described in the previous paragraph. Notably, in the recent past, several other similar areas of green space which are also integral to the character and visual amenity of West Kirby and its environs were also included in the Local Plan, but after extensive lobbying by community groups, environmentalists and individuals, these sites were subsequently removed from the Local Plan and were subsequently protected long-term by being designated “Green Space”.

These sites are: Rectory Road, Sheep Field and XXX.

What concerns us about the proposal so far

Through interactions with local groups it is clear that it is not just local residents that are unaware of the proposal to lift the restrictive covenant, but the majority of local people and key local stakeholders that we have communicated with are either completely unaware that any of the land in question is under consideration for extensive housing development, or have assumed (wrongly) that the development proposed is based on the small sub-area of the site that used to be a mushroom farm which is tucked away behind trees and had approval for one or two houses. As stated previously, this is not just a small, inconspicuous development. The current proposal, involves a massive housing development over 3.5 acres that will completely and permanently scar the landscape and change the character of West Kirby. It is the only potential development of more than 10 homes in West Kirby.

We are also concerned by the motives behind the development. It is our understanding that the current owners of the land are property developers and it is their daughter, who lives in Spain, that is the main individual behind trying to lift the current protective restrictive covenant to then enable the land to be sold. It appears that the sole purpose of developing the land is for extensive financial gain. We have attempted to obtain communications within the council regarding the transactions and interactions in order to lift the covenant under GDPR laws, but have to date been denied sight of these.

The importance of this “Green Space” land

Green Space - This large tract of land, that is currently physically green space, and has also been referred to as “Green Space” in previous communications to and From the Council, is integral to the character local community for many reasons. It also fulfils all of the criteria to have it recognised as “Green Space” – Terry please provide details from your doc.

Environmental - From an environmental perspective, the land in question is directly surrounded by Grange Hill a site of Historic Significance, Richness of Wildlife (surrounded by a Local Wildlife Site), Biodiversity and Ecology, Beauty and Tranquility. The area is also a foraging site for bats, has a large population of lizards and has been recently settled by badgers.

Community amenity - The areas directly adjacent to the land are constantly used by dog walkers, ramblers and other locals. This large flat expanse of land provides a sense of space, a feeling of extensive openness and provides land to sea views from many aspects. In addition the land in its undeveloped form provides a key view of the land and sea and windmills as one drives towards it on column road.

Social History

War Memorial - Immediately adjacent to the land in question the war memorial remembering the fallen from the whole surrounding region extending from XX to XX. A prominent local landmark with its surrounding , a place of contemplation for families of the deceased and locals alike. Key component of the Remembrance Day Parade that occurs annually.

Preserved Farmland – This site is one of the last preserved areas of farmland left in the village - Until the 1960s, West Kirby was a small farming community. The whole area on the

top of Grange Hill used to be farmland until very recently. Its preservation is therefore important within the social and historical context of the village.

#### Additional considerations

Once it is developed, it will be lost forever. As well as the sheer scale of the development, the associated telegraph poles, drainage and sewerage works, etc could have an impact on the aesthetics and character of the area but potentially have a knock-on effect to the directly adjacent protected wildlife sites. In addition, if 35 -50 houses are to be built, this equates to roughly 70 -100 cars accessing the site. Not only would this considerably add to the noise, pollution and character of the area, but it is hard to see how Grange Old Road, the only point of access could safely support this level of traffic when it barely manages with the very small trickle of cars that currently use it.

#### Specific objections annotated to paragraphs and sections of the local plan

3.29 Infrastructure – . RES-SA6.4 Land at Grange Hill Farm, West Kirby can only be accessed by Grange Old Road that is a narrow, short road, with a dangerous 90-degree bend which has no pavements in approximately half of it and is essentially single track for around two thirds of it. The road was annexed from Grange Road many years ago because it was an accident black spot. Currently the junctions of Grange Old Road (which would be essential to access the land), which now receives only minimal traffic, to Grange Road and Blackhorse Hill which are exceptionally busy main thoroughfares, are also accident black spots and are incredibly difficult and dangerous to navigate.

Policy WS 1.2 – This part of the policy states that developments must have a clear social value. Specifically, “Major development will be required to demonstrate that it is located, designed, constructed and operated in a manner that, where appropriate, delivers net social gain in support of the economic, health and cultural wellbeing of the local community”. It is unclear how the proposed development at RES-SA6.4 Land at Grange Hill Farm, West Kirby can fulfil these objectives.

Policy WS 1.2 states that “The rich natural environment of Wirral is protected, enhanced and well connected. Nature is in recovery thanks to the provision of a measurable net gain in biodiversity across the peninsula. The Borough’s ability to provide nature-based solutions to manage climate change is increased through a network of high-quality open spaces”. It is unclear how proposing a massive housing development such as RES-SA6.4 Land at Grange Hill Farm, West Kirby on a large tract of existing green space that sits directly adjacent to a site of special scientific interest can in any way fulfil this planning objective.

Under ws2 Viability - 3.58 It does not appear that RES-SA6.4 Land at Grange Hill Farm, West Kirby was assessed for viability by Aspinall Verdi

#### Under WS4.4

3.108-3.126 Open space, green and blue infrastructure biodiversity and geodiversity - It is unclear how proposing a massive housing development, such as RES-SA6.4 Land at Grange Hill Farm, West Kirby on a large tract of existing green space that sits directly adjacent to a site of special scientific interest can in any way fulfil these extensive planning objective.

Council have previously referred to this area as green space and large petition (currently nearly at 1000 sigs) campaigning that it be designated LGS.

3.130 “Landscape Value” – The Draft plan describes in detail the “landscape value” of the Wirral and how any proposed developments should interact with it. It states “Wirral is well known for its mature rural and coastal landscapes, with wooded sandstone ridges and flat, low-lying coastal plains. The Wirral Landscape Character Assessment provides a series of area profiles setting out recommendations for the future management of the key characteristics of each location”. We note that there is no detailed description of any assessment of landscape value of RES-SA6.4 Land at Grange Hill Farm, West Kirby. As it stands this large area of land provides key characteristics for the area but these have not been individually assessed.

Policy WS2 – Page 20 - Major development proposals (over 10 units) must include a social value statement to explain the social benefits that would arise from the development over the lifetime of the development. It is hard to see any conceivable social value of developing this large tract of Green Space at RES-SA6.4 Land at Grange Hill Farm, West Kirby as a large scale housing development.

Policy WS 5 – This emphasises the importance of Green Space. RES-SA6.4 Land at Grange Hill Farm, West Kirby is one of the last large remaining areas of Green Space in West Kirby that has been protected as such by a restrictive covenant placed in 1985. It is enjoyed as “Green Space” by all users to date. A massive development such as that proposed by RESSA6.4 Land at Grange Hill Farm, West Kirby, would permanently and irrevocably remove this important area of existing green space.

WS 5.1 Emphasises the importance of “Green and blue networks” i.e the visual amenity of views where land meets sea. The openness and Green Space of the extensive land at RESSA6.4 Land at Grange Hill Farm, West Kirby predominantly preserves a large green blue network that could only be destroyed or severely impeded by developing the land.

Policy 5.51 The plan states: “The priorities for West Kirby and Hoylake are to: Maintain and enhance the open aspect of the coastline. Also this states that the plan needs to address the local shortfall in parks and gardens, amenity greenspace, allotments and playing pitches and outdoor sport, through land allocations and Policy WS 5”. It is unclear how a massive development such as that proposed by RES-SA6.4 Land at Grange Hill Farm, West Kirby, would fulfil this planning aim. It will obliterate the currently open aspect of the coastline, would permanently remove a large open space that could be put to alternate uses such as increased allotment areas, recreational area etc.

#### Policy WS 5.8

“Landscape Character” - RES-SA6.4 Land at Grange Hill Farm, West Kirby does not appear to have been specifically assessed in the described Landscape Character

	<p>Assessment for the Borough. Policy WS 5.8 does however specifically state that "Development will not be permitted where the visual impact on the local and wider landscape would be inappropriate in terms of character, appearance and landscape setting of the surrounding area". It seems obvious that planning a massive housing development such as that proposed by RES-SA6.4 Land at Grange Hill Farm, West Kirby on one of the last areas of Green Space that provides characteristic landscape and green/blue views does not fulfil this planning objective.</p> <p>Policy WS6 – This "expects high quality development that contributes positively to existing places and communities in Wirral". Any development, especially one of such massive scale as RES-SA6.4 Land at Grange Hill Farm, West Kirby, in such a large and important tract of remaining "Green Space" cannot ever contribute positively to the existing place or community. WS 6 Describes "Placemaking principles – to help shape a place, connect to existing developments and be successful in and of self to positively contribute to the borough's appearance, range of facilities and vitality". A massive development such as that proposed by RES-SA6.4 Land at Grange Hill Farm, West Kirby, would permanently and irrevocably reverse all of the existing positive placemaking principles that this land currently provides.</p> <p>Policy WS 7.2 "Development proposals must take account of the privacy and amenity of the development's users and neighbours". This is of particular relevance to the severe difficulties that will result in relation to traffic access. This is already a known traffic accident hotspot. It will be extremely dangerous if the land is developed as there will be 50-100 additional cars regularly using these very dangerous junctions and also Grange old road which is essentially single track in about 60% with a blind 90 degree bend that was closed/bypassed with Grange Road as it was so dangerous! There is traffic chaos already on Monday nights when a handful of cars pick up and drop off to the sea cadets.</p> <p>Policy WS9 – "Development proposals will be expected to ...operate effectively and safely and not create severe impacts to existing networks". RES-SA6.4 Land at Grange Hill Farm, West Kirby. can only be accessed by Grange Old Road that is a narrow, short road, with a dangerous 90 degree bend which has no pavements in approximately half of it and is essentially single track for around two thirds of it. The road was annexed from Grange Road many years ago because it was an accident black spot. Currently the junctions of Grange Old Road (which would be essential to access the land), which now receives only minimal traffic, to Grange Road and Blackhorse Hill which are exceptionally busy main thoroughfares, are also accident black spots and are incredibly difficult and dangerous to navigate.</p>
<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability</b></p>	

Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
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.	Do not allocate RES-SA6.4 in the Local Plan.
If your representation is seeking a	

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

<b>Comment ID</b>	LPSD-493
<b>Person ID</b>	1311854
<b>Include files</b>	<a href="#">LPSD-217,222,226,229,493,495-497,499-501,503-Heath_Redacted.pdf</a>
<b>Consultee Name</b>	Mr John Heath
<b>Position</b>	Planning Rep & Convenor and Steering Group Member
<b>Company / Organisation</b>	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Appendix 10
<b>Title</b>	Developer Contributions
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
<b>Please state which paragraph number(s) this representation relates to.</b>	10.32
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> *        Yes *        No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *        Yes *        No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> *        Not Positively Prepared *        Not Justified *        Not Effective *        Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	10.32, ITPAS (Irby, Thurstaston & Pensby Amenity Society) and WGSa (Wirral Green Space Alliance - an association of over 30 community and pressure groups with over 5,000 Members (see list at end of this 'Representation') strongly support the Draft Local Plan (DLP) based mainly upon 'Regeneration' and limited development within some other existing urban areas. This was the approach demanded by WGSa Groups, including ITPAS, and from mid to late 2019 belatedly accepted by Wirral Metropolitan Borough Council (WMBC). However, we have concluded that there are both significant and advisable changes required for the Draft Local Plan to be classed as 'sound', requiring modification and a 'Main Modification', the latter being seen as essential to remove an unnecessary risk over the medium term to the success of this Local Plan in the achievement of its stated Aims and Objectives. This and further 'Representations'

from ourselves and other WGSA Colleagues (most notably Prof. David Gregg and Hilary Ash) address these matters where we believe the Plan is lacking in being 'positively prepared', 'justified', effective' and/or 'consistent with national policy'.

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

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

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

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

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

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

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

#### Ground 1.

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

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

#### Ground 2.

The Council has (for reasons one can only speculate) taken the flawed LU2 Report ('Exploring the Computation of Housing Need in Wirral 2020') at unquestioned face-value and has not addressed in-house or independently either the criticisms of that and earlier LU Reports, or the several Papers sent it by Prof. Gregg and Graham Stevens, or the scope and conclusions of Prof. Ludi Simpson's companion Report (to LU's own original two Reports for WMBC), which all have similar projections. Again, the Reader is directed to the Report by Prof. Gregg lodged as a WGSA 'Representation'.



### Ground 3.

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

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

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

(i) The exceptionally high levels and extent (on a national scale) of deprivation and poor health outcomes especially in the east and north of Wirral, which are not to any degree addressed by the additional Housing Stock represented by 'Housing Need';

(ii) The exceptional disparity across the Peninsula, in terms of wealth, housing, employment, 'green environments', public services particularly health services, which would not to any material degree be addressed by additional expensive housing in the west of Wirral;

(iii) The tightly-drawn Green Belt boundaries around existing urban areas, specifically introduced and maintained by the former Merseyside County Council (MCC) (with agreement of all LAs within it) for the purpose of addressing (i) and (ii) above, where past efforts and initiatives had failed and adverse conditions had persisted and worsened, and where the LCR is fully behind Wirral's current drive to wholesale Regeneration;

(iv) Consequent loss of Green Belt from a high 'Housing Need' figure derived from the formerly-mandated 'Standard Method' and 2014ONS Data (higher than that derived through alternative means) was included within Secretary of State letters to the Council as a possible ground for there being 'exceptional circumstances';

(v) An inflated, unnecessarily high 'Housing Need' figure runs the avoidable risk of Housing Delivery Test (HDT) difficulties down the line, where delivery may have met actual demand but where actual demand had not kept up with theoretical HDT targets. In this situation, the Council would be under undue pressure to deliver on non-existent demand, that developers and landowners would argue could easily be achieved by housing developments in Green Belt, attracting inward migration (mainly of more elderly pensioners) which would add little to the local economy as their need for public services would increase over time (especially for expensive health services) and Wirral's exceptional 'green' assets would be diminished.

(vi) Wirral is a Peninsula bounded for the most part by protected coastal zones of local, national and international significance for wildlife, ecology, biodiversity, environment and scenery as well as the wellbeing of its Residents and Visitors. And, where much of the inland, non-urban land is open Green Belt and farmland which is (i) critically-related to the protected coastal areas as breeding, foraging and sheltering necessarily open grounds (recognised in Para 3.122 and strongly emphasised and supported by us); (ii) includes many areas subject to periodic or regular flooding; and (iii) is largely 'productive' agricultural farmland with B&MV soils, the protection of which has already resulted (in theory if not yet in practice) through a unanimously passed Motion in Council NOT to release ANY 'productive farmland' for development, in line with its declared 'Climate Emergency' and now Government statements of intent to protect farmland for essential future 'Food Security'.

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

Barnston Village Conservation Society Bebington Residents Bidston Village Conservation Area Bromborough Society CPRE Cheshire and Wirral Claremont Group

Conservation Areas Wirral Defend Wirral's Green & Open Spaces Eastham Village Preservation Association

Frankby Conservation Area Advisory Committee

Friends of Birkenhead Park Greasby Community Association

Hamilton Square Conservation Area Heswall Society Irby Cricket Club Irby, Thurstaston & Pensby Amenity Society King's Gap Conservation Area Meols Drive Conservation Area

Mountwood Residents Oxtun Society Saughall Massie Conservation Area

Stop Hoylake Golf Resort Action Group Storeton Residents Assoc. The Caldby Society The Ramblers Wirral Group The Wirral Society Thornton Hough Community Trust Ltd

Thornton Hough Conservation Area Society

Wirral and Cheshire Wildlife Wirral Barn Owl Trust

Wirral Footpaths and Open Spaces Preservation Society

**omplies with the Duty**

**to co-operate**

\* **Yes**

\* **No**

<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><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or</b></p>	<p>We draw attention to Para 10.32 (et al) in this regard and call on the Council to make it clear that the 'exceptional circumstances' referred here in order to make land available "for the delivery of additional school or education capacity necessary to serve the development" does not relate to the Release of Green Belt or other Greenspace land as this would be a direct consequence of approving a housing development and contradict the commitment that the Local Plan is predicated on there being NIL necessity to release Green Belt for Housing.</p> <p>Please refer to Professor David Gregg's main report and executive summary for evidence and direction regarding 'Housing Need', the latter of which, deconstructs the original para 3.15 et seq., and the separate Paper on the failure of the Liverpool University Report (LU2) to justify there NOT being 'Exceptional Circumstances'.</p>

<p><b>5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>WGSA and Professor Gregg (and other WGSA and allied population and planning experts) would be willing to continue liaising with WMBC in order to reach a realistic 'Housing Need' figure and related other modifications with the intention of completing the exercise in a short period and resulting in a truly 'sound' Local Plan, one which matches the real needs of Wirral.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	<p>Below I give the reasoning why I should participate in hearing session(s) as a member of the WGSA Team and then why WGSA should have a participating Team:</p> <p>Having seen individuals and Groups struggling to communicate effectively with the Council over the emerging Local Plan, three years ago I, as Planning Rep for ITPAS (Irby, Thurstaston &amp; Pensby Amenity Society) became co-founder and Convenor of WGSA (Wirral Green Space Alliance) in order to co-ordinate the work and liaison with outside and in-house experts (including nationally-renowned Population experts and government advisers Prof Ludi Simpson and Piers Elias, WGSA's own Prof David Gregg, Hilary Ash of Wirral &amp; Cheshire Wildlife, Planning Consultant Jackie Copley of CPRE and The Wirral Society, and our legal advisers); also, to organise responses to and direct contact with the Council and to ramp up political pressure. The Alliance quickly grew to 31 local Groups, held regular meetings and communicated extensively online.</p>

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

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

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Wirral Green Space Alliance (WGSA) is a consortium of 31 local groups, representing over 5,000 members who wish the deplorable long-term disparity across the Peninsula to be at last addressed by regeneration of run-down areas of nationally-high deprivation, poor living conditions and adverse health outcomes (including a 10-year shorter life-expectancy), and Wirral's actual Housing Need to be delivered through regeneration together with some further development within other existing urban areas. This action would have the consequential benefit WGSA also seeks in its opposition to unjustified loss of greenspace for development.

What WGSA recommends is a positive housing need figure that will support regeneration and levelling up and the desirable consequence of protecting all of Wirral's green space, including Green Belt, for the benefit of all in the future.

WGSA strongly supports the Local Plan Submission Draft to be progressed to adoption; however, it is strongly opposed to the imposition of the vastly-inflated housing requirement, which unduly risks Wirral's greenspace for development in the event that the Council fails the "Housing Delivery Test" in the future, made more likely by the overstated 'Housing Need' figure, and where greenspace/Green Belt release and development would stall or frustrate the worthy Regeneration and 'levelling-up' agenda.

After the 2019 Local Elections, when WGSA actions were largely responsible for both the change of local political control and the Local Plan approach (from mass housebuilding in Green Belt to a Regeneration-led one), the Council announced that it had to listen to and involve WGSA going forward. Throughout all stages since then, WGSA and WMBC have debated progress of the DLP with great success except for formal agreement on the real 'Housing Need'. It would seem to be a natural continuation of our relationship with the Council and the emerging Local Plan, for WGSA to have a small Team participating in hearing session(s) on what has been our major concern. There are a few other matters where we would appreciate participation in hearing sessions, separately or in combination with our principal objection (the inflated 'Housing Need').

The WGSA Team at LP Examination would ideally be headed by WGSA's Barrister Killian Garvey (King's Chamber) and supported by Prof David Gregg (on Housing Need, Air Quality and Heritage), our Wirral & Cheshire Wildlife Rep, Hilary Ash, who has assisted the Council for many years on a voluntary basis with its Environmental Strategies and Policies, and Jackie Copley, our Planning Consultant and representative of CPRE and The Wirral Society, plus John Heath (retired Architect and WGSA Founder/Convenor).

We support an Adopted Local Plan, with a realistic housing requirement to enable Wirral Council to better steer sustainable development, and in doing so, conserve Wirral's green spaces for the enjoyment and benefit of all in the future.

At the time of drafting over 22,000 people had signed WGSA petitions saying no to releasing Green Belt land for development – Brownfield First!  
<https://www.change.org/p/councillor-janette-williamson-say-no-to-releasing-wirral-s-green-belt-land-for-development-brownfield-first>

**Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral**

Yes

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

\*     **Yes**  
\*     **No**

<b>Comment ID</b>	LPSD-494
<b>Person ID</b>	1323445
<b>Include files</b>	<a href="#">LPSD-494-EM-Chester-Attach 0507_Redacted.PDF</a>
<b>Consultee Name</b>	Rev. David and Mrs. Jennifer Chester
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Policy WP 6.3
<b>Title</b>	Residential Sites
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
<b>Please state which paragraph number(s) this representation relates to.</b>	
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	RES-SA6.4

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer to attachment Aim of Wirral local plan 2021-37 The foreword, makes it very clear that the plan “sets out a range of policies that will help the whole of the Borough respond to climate change, protect our natural and built heritage assets, support high quality design and provide affordable homes that local people need”. We will expand upon this mission statement, and how we feel that inclusion of this land is entirely unsuitable for inclusion for multiple reasons that we will highlight, in more detail and aligned to specific paragraphs of the local plan throughout this letter. Brief background to other similar green spaces West Kirby in the recent past

It has only recently come to the attention of the direct local residents of Grange Old Road, and Friends of Grange Hill, both arguably the key local stakeholder groups, that this land, currently representing one of the last large areas of green space in West Kirby was ever being earmarked for development. West Kirby is a small, community centred village. The area to be developed is comparatively enormous, representing roughly 3.5 acres and is proposed to accommodate 35-50 houses, depending what documents one reads. It can only be accessed by Grange Old Road that is a narrow, short road, with a dangerous 90 degree bend which has no pavements in approximately half of it and is essentially single track for around two thirds of it. The road was annexed from Grange Road many years ago because it was an accident black spot. Currently the junctions of Grange Old Road (which would be essential to access the land), which now receives only minimal traffic, to Grange Road and Blackhorse Hill which are exceptionally busy main thoroughfares, are also accident black spots and are incredibly difficult and dangerous to navigate.

The land at Grange Hill is currently protected from development by a restrictive covenant filed as recently as 1985. We have only recently been made aware that an application is to be made to have this lifted, that will then enable it to be fully developed to the extent as described in the previous paragraph. Notably, in the recent past, several other similar areas of green space which are also integral to the character and visual amenity of West Kirby and its environs were also included in the Local Plan, but after extensive lobbying by community groups, environmentalists and individuals, these sites were subsequently removed from the Local Plan and were subsequently protected long-term by being designated "Green Space". These sites are: Rectory Road, Sheep Field and XXX.

What concerns us about the proposal so far

Through interactions with local groups it is clear that it is not just local residents that are unaware of the proposal to lift the restrictive covenant, but the majority of local people and key local stakeholders that we have communicated with are either completely unaware that any of the land in question is under consideration for extensive housing development, or have assumed (wrongly) that the development proposed is based on the small sub-area of the site that used to be a mushroom farm which is tucked away behind trees and had approval for one or two houses. As stated previously, this is not just a small, inconspicuous development. The current proposal, involves a massive housing development over 3.5 acres that will completely and permanently scar the landscape and change the character of West Kirby. It is the only potential development of more than 10 homes in West Kirby.

We are also concerned by the motives behind the development. It is our understanding that the current owners of the land are property developers and it is their daughter, who lives in Spain, that is the main individual behind trying to lift the current protective restrictive covenant to then enable the land to be sold. It appears that the sole purpose of developing the land is for extensive financial gain. We have attempted to obtain communications within the council regarding the transactions and interactions in order to lift the covenant under GDPR laws, but have to date been denied sight of these.

The importance of this "Green Space" land Green Space -

This large tract of land, that is currently physically green space, and has also been referred to as "Green Space" in previous communications to and From the Council, is integral to the character local community for many reasons. It also fulfils all of the criteria to have it recognised as "Green Space" – Terry please provide details from your doc.

Environmental - From an environmental perspective, the land in question is directly surrounded by Grange Hill a site of Historic Significance, Richness of Wildlife (surrounded by a Local Wildlife Site), Biodiversity and Ecology, Beauty and Tranquility. The area is also a foraging site for bats, has a large population of lizards and has been recently settled by badgers.

Community amenity - The areas directly adjacent to the land are constantly used by dog walkers, ramblers and other locals. This large flat expanse of land provides a sense of space, a feeling of extensive openness and provides land to sea views from many aspects. In addition the land in its undeveloped form provides a key view of the land and sea and windmills as one drives towards it on column road.

Social History

War Memorial - Immediately adjacent to the land in question the war memorial remembering the fallen from the whole surrounding region extending from XX to XX. A prominent local landmark with its surrounding , a place of contemplation for families of the deceased and locals alike. Key component of the Remembrance Day Parade that occurs annually.

Preserved Farmland – This site is one of the last preserved areas of farmland left in the village - Until the 1960s, West Kirby was a small farming community. The whole area on the top of Grange Hill used to be farmland until very recently. Its preservation is therefore important within the social and historical context of the village.

Additional considerations

Once it is developed, it will be lost forever. As well as the sheer scale of the development, the associated telegraph poles, drainage and sewerage works, etc could have an impact on the aesthetics and character of the area but potentially have a knock-on effect to the directly adjacent protected wildlife sites. In addition, if 35 -50 houses are to be built, this equates to roughly 70 -100 cars accessing the site. Not only would this considerably add to the noise, pollution and character of the area, but it is hard to see how Grange Old Road, the only point of access could safely support this level of traffic when it barely manages with the very small trickle of cars that currently use it.

Specific objections annotated to paragraphs and sections of the local plan

3.29 Infrastructure – . RES-SA6.4 Land at Grange Hill Farm, West Kirby can only be accessed by Grange Old Road that is a narrow, short road, with a dangerous 90-degree bend which has no pavements in approximately half of it and is essentially single track for around two thirds of it. The road was annexed from Grange Road many years ago because it was an accident black spot. Currently the junctions of Grange Old Road (which would be essential to access the land), which now receives only minimal traffic, to Grange Road and Blackhorse Hill which are exceptionally busy main thoroughfares, are also accident black spots and are incredibly difficult and dangerous to navigate.



Policy WS 1.2 – This part of the policy states that developments must have a clear social value. Specifically, “Major development will be required to demonstrate that it is located, designed, constructed and operated in a manner that, where appropriate, delivers net social gain in support of the economic, health and cultural wellbeing of the local community”. It is unclear how the proposed development at RES-SA6.4 Land at Grange Hill Farm, West Kirby can fulfil these objectives.

Policy WS 1.2 states that “The rich natural environment of Wirral is protected, enhanced and well connected. Nature is in recovery thanks to the provision of a measurable net gain in biodiversity across the peninsula. The Borough’s ability to provide nature-based solutions to manage climate change is increased through a network of high-quality open spaces”. It is unclear how proposing a massive housing development such as RES-SA6.4 Land at Grange Hill Farm, West Kirby on a large tract of existing green space that sits directly adjacent to a site of special scientific interest can in any way fulfil this planning objective.

Under ws2 Viability - 3.58 It does not appear that RES-SA6.4 Land at Grange Hill Farm, West Kirby was assessed for viability by Aspinall Verdi

Under WS4.4

3.108-3.126 Open space, green and blue infrastructure biodiversity and geodiversity - It is unclear how proposing a massive housing development, such as RES-SA6.4 Land at Grange Hill Farm, West Kirby on a large tract of existing green space that sits directly adjacent to a site of special scientific interest can in any way fulfil these extensive planning objective. Council have previously referred to this area as green space and large petition (currently nearly at 1000 sigs) campaigning that it be designated LGS.

3.130 “Landscape Value” – The Draft plan describes in detail the “landscape value” of the Wirral and how any proposed developments should interact with it. It states “Wirral is well known for its mature rural and coastal landscapes, with wooded sandstone ridges and flat, low-lying coastal plains. The Wirral Landscape Character Assessment provides a series of area profiles setting out recommendations for the future management of the key characteristics of each location”. We note that there is no detailed description of any assessment of landscape value of RES-SA6.4 Land at Grange Hill Farm, West Kirby. As it stands this large area of land provides key characteristics for the area but these have not been individually assessed.

Policy WS2 – Page 20 - Major development proposals (over 10 units) must include a social value statement to explain the social benefits that would arise from the development over the lifetime of the development. It is hard to see any conceivable social value of developing this large tract of Green Space at RES-SA6.4 Land at Grange Hill Farm, West Kirby as a large scale housing development.

Policy WS 5 – This emphasises the importance of Green Space. RES-SA6.4 Land at Grange Hill Farm, West Kirby is one of the last large remaining areas of Green Space in West Kirby that has been protected as such by a restrictive covenant placed in 1985. It is enjoyed as “Green Space” by all users to date. A massive development such as that proposed by RESSA6.4 Land at Grange Hill Farm, West Kirby, would permanently and irrevocably remove this important area of existing green space. WS 5.1 Emphasises the importance of “Green and blue networks” i.e the visual amenity of views where land meets sea. The openness and Green Space of the extensive land at RESSA6.4 Land at Grange Hill Farm, West Kirby predominantly preserves a large green blue network that could only be destroyed or severely impeded by developing the land.

Policy 5.51 The plan states: “The priorities for West Kirby and Hoylake are to: Maintain and enhance the open aspect of the coastline. Also this states that the plan needs to address the local shortfall in parks and gardens, amenity greenspace, allotments and playing pitches and outdoor sport, through land allocations and Policy WS 5”. It is unclear how a massive development such as that proposed by RES-SA6.4 Land at Grange Hill Farm, West Kirby, would fulfil this planning aim. It will obliterate the currently open aspect of the coastline, would permanently remove a large open space that could be put to alternate uses such as increased allotment areas, recreational area etc.

Policy WS 5.8

“Landscape Character” - RES-SA6.4 Land at Grange Hill Farm, West Kirby does not appear to have been specifically assessed in the described Landscape Character Assessment for the Borough. Policy WS 5.8 does however specifically state that “Development will not be permitted where the visual impact on the local and wider landscape would be inappropriate in terms of character, appearance and landscape setting of the surrounding area”. It seems obvious that planning a massive housing development such as that proposed by RES-SA6.4 Land at Grange Hill Farm, West Kirby on one of the last areas of Green Space that provides characteristic landscape and green/blue views does not fulfil this planning objective.

Policy WS6 – This “expects high quality development that contributes positively to existing places and communities in Wirral”. Any development, especially one of such massive scale as RES-SA6.4 Land at Grange Hill Farm, West Kirby, in such a large and important tract of remaining “Green Space” cannot ever contribute positively to the existing place or community. WS 6 Describes “Placemaking principles – to help shape a place, connect to existing developments and be successful in and of self to positively contribute to the borough’s appearance, range of facilities and vitality”. A massive development such as that proposed by RES-SA6.4 Land at Grange Hill Farm, West Kirby, would permanently and irrevocably reverse all of the existing positive placemaking principles that this land currently provides.

Policy WS 7.2 “Development proposals must take account of the privacy and amenity of the development’s users and neighbours”. This is of particular relevance to the severe difficulties that will result in relation to traffic access. This is already a known traffic accident hotspot. It will be extremely dangerous if the land is developed as there will be 50-100 additional cars regularly using these very dangerous junctions and also Grange old road which is essentially single track in about 60% with a blind 90 degree bend that was closed/bypassed with Grange Road as it was so dangerous! There is traffic chaos already on Monday nights when a handful of cars pick up and drop off to the sea cadets.

Policy WS9 – “Development proposals will be expected to ...operate effectively and safely and not create severe impacts to existing networks”. RES-SA6.4 Land at Grange Hill Farm, West Kirby. can only be accessed by Grange Old Road that is a narrow, short road, with a dangerous 90 degree bend which has no pavements in approximately half of it and is essentially single track for around two thirds of it. The road was annexed from Grange Road many years ago because it was an accident black spot. Currently the junctions of Grange Old Road (which would be essential to access the land), which now receives only minimal traffic, to Grange Road and Blackhorse Hill which are exceptionally busy main thoroughfares, are also accident black spots and are incredibly difficult and dangerous to navigate.

<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b></p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</b></p>	<p>Do not allocate RES SA6.4 in the Local Plan. Designate as Local Green Space in the Local Plan instead.</p>

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

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

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

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

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

\*      **Yes**  
\*      **No**

<b>Comment ID</b>	LPSD-495
<b>Person ID</b>	1311854
<b>Include files</b>	<a href="#">LPSD-217,222,226,229,493,495-497,499-501 &amp;503-Heath_Redacted.pdf</a>
<b>Consultee Name</b>	Mr John Heath
<b>Position</b>	Planning Rep & Convenor and Steering Group Member
<b>Company / Organisation</b>	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Part 2
<b>Title</b>	The Places and Our Vision
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
<b>Please state which paragraph number(s) this representation relates to.</b>	Para 2.3
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> *        Yes *        No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *        Yes *        No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * <b>Not Positively Prepared</b> * <b>Not Justified</b> * <b>Not Effective</b> * <b>Not Consistent with National Policy</b>	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	Para 2.3: Firstly: We support this paragraph explaining why the land away from the coast and outside existing urban areas was designated as 'tightly drawn' Green Belt, in order to, "protect the character of towns and villages: and direct development into existing towns. This was to assist in ... regeneration ...". However, some further explanation and emphasis should be added to the DLP text as: (i) the character of towns and villages to be protected is not just within them but also to preserve separation between distinct communities, in line with the second Purpose of Green Belt [(b) to prevent neighbouring towns merging into one another]; and (ii) after many years of decline and failed initiatives, actively to direct development solely to existing areas particularly the run-down, declining and deprived areas mainly in the east and north of Wirral, in line with the fifth Purpose of Green Belt [(e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.]. The forerunner to the 'Liverpool City Region' (LCR), Merseyside County Council (MCC), had the agreement of all other LAs within MCC to draw up Wirral's Green Belt in this way, recognising the overriding need for 'Regeneration' on Wirral, with other new housing outside of existing urban areas taking place mainly off the Peninsula. The need persists.

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

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

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

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

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

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

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

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

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

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

* No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of	<p>Para 2.3 ... some further explanation and emphasis should be added to the DLP text as: (i) the character of towns and villages to be protected is not just within them but also to preserve separation between distinct communities, in line with the second Purpose of Green Belt [(b) to prevent neighbouring towns merging into one another]; and (ii) after many years of decline and failed initiatives, actively to direct development solely to existing areas particularly the run-down, declining and deprived areas mainly in the east and north of Wirral, in line with the fifth Purpose of Green Belt [(e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.]The forerunner to the 'Liverpool City Region' (LCR), Merseyside County Council (MCC), had the agreement of all other LAs within MCC to draw up Wirral's Green Belt in this way, recognising the overriding need for 'Regeneration' on Wirral, with other new housing outside of existing urban areas taking place mainly off the Peninsula. The need persists.</p> <p>Secondly: An increasing proportion of Wirral's Green Belt is being given over to equestrian use for grazing and stables. The open aspect ('openness') is becoming heavily compromised by horse shelters, caravans, unauthorised construction and hardstandings, and great unsightly piles of manure and discarded equipment arising from poor management and lack of Council monitoring and action. There are two main issues here apart from the loss of 'openness':</p>



<p><b>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</b></p>	<p>(i) a reducing area of land is being used for agricultural production at a time when the value of such land for future 'Food Security' and political self-determination is gaining prominence. This has extended locally to the Council having passed unanimously a Motion that NIL 'productive agricultural land' should be released for development; and</p> <p>(ii) there are a rising and worrying number of Green Belt sites, having been turned to equestrian uses, subsequently being classed as Previously Developed Land (PDL) and thus available for particularly Housing use, when Green Belt legislation should deem this 'inappropriate' but poor management and lack of control renders sites unsightly, promoting an acceptance of 'tidying-up' through development. Neither of these facts and concerns is stressed in the DLP but should be.</p>
<p><b>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b></p> <p>* <b>No, I do not wish to participate in hearing session(s)</b></p> <p>* <b>Yes, I wish to participate in hearing session(s)</b></p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	<p>Below I give the reasoning why I should participate in hearing session(s) as a member of the WGSA Team and then why WGSA should have a participating Team:</p> <p>Having seen individuals and Groups struggling to communicate effectively with the Council over the emerging Local Plan, three years ago I, as Planning Rep for ITPAS (Irby, Thurstaston &amp; Pensby Amenity Society) became co-founder and Convenor of WGSA (Wirral Green Space Alliance) in order to co-ordinate the work and liaison with outside and in-house experts (including nationally-renowned Population experts and government advisers Prof Ludi Simpson and Piers Elias, WGSA's own Prof David Gregg, Hilary Ash of Wirral &amp; Cheshire Wildlife, Planning Consultant Jackie Copley of CPRE and The Wirral Society, and our legal advisers); also, to organise responses to and direct contact with the Council and to ramp up political pressure. The Alliance quickly grew to 31 local Groups, held regular meetings and communicated extensively online.</p>

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

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

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Wirral Green Space Alliance (WGSA) is a consortium of 31 local groups, representing over 5,000 members who wish the deplorable long-term disparity across the Peninsula to be at last addressed by regeneration of run-down areas of nationally-high deprivation, poor living conditions and adverse health outcomes (including a 10-year shorter life-expectancy), and Wirral's actual Housing Need to be delivered through regeneration together with some further development within other existing urban areas. This action would have the consequential benefit WGSA also seeks in its opposition to unjustified loss of greenspace for development.

What WGSA recommends is a positive housing need figure that will support regeneration and levelling up and the desirable consequence of protecting all of Wirral's green space, including Green Belt, for the benefit of all in the future.

WGSA strongly supports the Local Plan Submission Draft to be progressed to adoption; however, it is strongly opposed to the imposition of the vastly-inflated housing requirement, which unduly risks Wirral's greenspace for development in the event that the Council fails the "Housing Delivery Test" in the future, made more likely by the overstated 'Housing Need' figure, and where greenspace/Green Belt release and development would stall or frustrate the worthy Regeneration and 'levelling-up' agenda.

After the 2019 Local Elections, when WGSA actions were largely responsible for both the change of local political control and the Local Plan approach (from mass housebuilding in Green Belt to a Regeneration-led one), the Council announced that it had to listen to and involve WGSA going forward. Throughout all stages since then, WGSA and WMBC have debated progress of the DLP with great success except for formal agreement on the real 'Housing Need'. It would seem to be a natural continuation of our relationship with the Council and the emerging Local Plan, for WGSA to have a small Team participating in hearing session(s) on what has been our major concern. There are a few other matters where we would appreciate participation in hearing sessions, separately or in combination with our principal objection (the inflated 'Housing Need').

The WGSA Team at LP Examination would ideally be headed by WGSA's Barrister Killian Garvey (King's Chamber) and supported by Prof David Gregg (on Housing Need, Air Quality and Heritage), our Wirral & Cheshire Wildlife Rep, Hilary Ash, who has assisted the Council for many years on a voluntary basis with its Environmental Strategies and Policies, and Jackie Copley, our Planning Consultant and representative of CPRE and The Wirral Society, plus John Heath (retired Architect and WGSA Founder/Convenor).

We support an Adopted Local Plan, with a realistic housing requirement to enable Wirral Council to better steer sustainable development, and in doing so, conserve Wirral's green spaces for the enjoyment and benefit of all in the future.

At the time of drafting over 22,000 people had signed WGSA petitions saying no to releasing Green Belt land for development – Brownfield First!  
<https://www.change.org/p/councillor-janette-williamson-say-no-to-releasing-wirral-s-green-belt-land-for-development-brownfield-first>

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

Yes

and adoption of the  
Plan).

\* Yes

\* No

<b>Comment ID</b>	LPSD-496
<b>Person ID</b>	1311854
<b>Include files</b>	<a href="#">LPSD-217,222,226,229,493,495-497,499-501 &amp;503-Heath_Redacted.pdf</a>
<b>Consultee Name</b>	Mr John Heath
<b>Position</b>	Planning Rep & Convenor and Steering Group Member
<b>Company / Organisation</b>	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Part 2
<b>Title</b>	The Places and Our Vision
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
<b>Please state which paragraph number(s) this representation relates to.</b>	Para 2.7
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> *        Yes *        No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *        Yes *        No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> *        Not Positively Prepared *        Not Justified *        Not Effective *        Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	<p>Para 2.7: We recognise particularly in the east of the Peninsula the “high levels of multiple deprivation”. These figures are simply awful and disgraceful, and their level, extent and worsening persistence over decades, together with the huge disparity across the Wirral, demand immediate attention and prioritising to the exclusion of other interests and agendas, including landowners’ and developers’ natural desire to maximise the value and development returns of their assets. Such are the levels of deprivation and disparity that they feature highly in national statistics and must constitute exceptional circumstances, including the ‘Exceptional Circumstances’ required to depart from the calculation of ‘Housing Need’ using the (discredited and to be abandoned) ‘Standard Method’ and wholly discredited, out-of-date and highly distorting 2014 ONS Population Data.</p> <p>The Council point to the University of Liverpool’s commissioned Reports which conclude that certain of Wirral’s criteria and figures are not particularly ‘exceptional’. This has allowed the Council, for reasons never satisfactorily explained, to continue with an admitted, vastly-inflated ‘Housing Need’ (and ‘Housing Requirement’), several times the level indicated by Local</p>

	<p>Administrative Data and calculations by WGSA experts and observations by nationally-renowned experts (including Prof Ludi Simpson, formerly of Manchester University). ITPAS and WGSA seek the disregarding of the University of Liverpool's Reports and Conclusions on the bases that: (i) they consider too few relevant matters; (ii) they concentrate comments based upon one set of ONS Data (now discredited); and (iii) they ignore the fact that 'Exceptional Circumstances' is not legally or narrowly defined and can relate to more than a set of statistics, which in Wirral's case should include (a) the degree of Deprivation; (b) the thousands of 'Substandard' dwellings (poor state of much of the Housing Stock); (c) the constricting Geography of a Peninsula with protected 'exclusion' zones all around and linked areas within; (d) the potential for loss of Green Belt (highlighted by a past Secretary of State); and more. Prof Gregg's Rebuttal of Liverpool University's Report on 'Exceptional Circumstances' is relevant here and attached.</p> <p>Attention is drawn to separate, detailed 'Representations' and Reports lodged by WGSA Members including Prof David Gregg and Jackie Copley (Planning Consultant), and to support expressed by Prof Ludi Simpson, Piers Elias and others, including indirectly (through liaison with Prof Gregg) the Office of Statistics Regulation (OSR, ONS's Regulator), the common conclusions of whom centre on a 'Housing Need' for additional homes of the order of 4,300 over 16 years compared with the inflated Council figure of over 13,000. This disparity itself is also regarded as an 'Exceptional Circumstance', being well above the normal material threshold for 'significance', 15% to 25%.</p> <p>On these grounds and others covered later and separately by WGSA experts and Members, ITPAS and WGSA are calling for a 'Main Modification' to reduce the 'Housing Need' figure to a more realistic one based upon proven, up-to-date Data, a figure that would increase certainty of Delivery of what is actually needed and leave 'headroom' for addressing the Replacement and/or Upgrading of 'Substandard' Housing Stock and their surrounds. That this would be possible without fundamental change to the DLP or the Timescale was stated in meetings with the Council, including by the former Head of Planning and the Local Plan Team.</p> <p>Para 2.10: The more significant statistic here is that almost 40% of Wirral Residents who are in employment commute off-Peninsula for their work. This produces a high amount of polluting vehicle journeys and mileage, and traffic congestion at peak times. Were there a significant increase in employment on Wirral, this could see commuters choosing to take up the new local opportunities, which could lead to these damaging figures actually reducing, with both the Air Quality and work/life balance improving. Further, this type of change in the employment and commuting pattern would not involve a need for additional Housing Stock as those involved would already be Residents of Wirral. Only after this 'slack' were taken up and/or Residents' incomes had risen significantly would additional housing be required to address economic growth – i.e., a pro-rata reduced rate. This factor is yet another reason why the Council's 'Housing Need' figure in excess of 13,000 is absurd and a great and damaging exaggeration which can only do harm if not reduced to sensible levels through a 'Main Modification'.</p> <p>Para 2.13 and Policy WS 1.1 (also Para 2.6 refers): Empty Homes back into Use:</p> <p>This paragraph (2.13) touches on one element of the Council's understatement of the Supply Side for Housing, namely 'Empty Homes'. Wirral has (according to the SHMA 2020 and other sources) around 150,000 dwellings and a vacancy rate of circa 3.3%, which is 33% higher than the national average of 2.5%. This means just under 5,000 homes are 'empty' but Wirral has an exemplar, consistent record over 10 years of both a commitment to address this dreadful "waste" and a recorded delivery of over 250 'Empty Homes back into Use' each and every year (278 in the last full pre-Covid year). This should surely mean that it would be entirely reasonable and safe to include within the Local Plan a net supply of, say, 200 additional homes per annum (or 1,000 homes in the first 5-Year Period or 3,200 additional homes over the 16-year period of the Plan) through continuation of the commitment, programme and sustained delivery of 'Empty Homes back into Use'. However, fearing the whole category might be discounted, the DLP only includes less than 50% of the proven, consistent Delivery over the past decade. See also Policy WS 1.1, Page 57, which shows just 490 + 440 + 480 net additions for the Plan periods of 5, 5 and 6 years, or only 1,410 additional homes in all. We do not consider this to be reasonable, particularly as there are other contingencies on the Supply Side (Delivery Totals) including an arbitrary overall 10% discount (pulled out of thin air). This is contingency upon contingency, but it should give further confidence in the Council's ability to deliver in excess of the number of dwellings to meet the actual 'Housing Need' of Wirral.</p>
<b>complies with the Duty to co-operate</b> *        Yes *        No	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	

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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 Habitats Regulations Assessment, please make them here.</p>	
<p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound.</b></p>	<p>Although WGSA call for a 'Main Modification' regarding issues and consequences around the highly inflated 'Housing Need' figure, this requires much more than a simple edit of the DLP text. The commentary to earlier Questions outlines the magnitude and absolute necessity for modification of the 'Housing Number' and 'Housing Requirement' justified by grounds including the clear fact that there ARE 'Exceptional Circumstances' to assess the true 'Housing Need' using an alternate methodology and up-to-date datasets. This does not detract from our very strong support for the overall, 'Regeneration-led' approach and basis to the Draft Local Plan.</p> <p>Please refer to Professor David Gregg's main report and executive summary for evidence and direction regarding 'Housing Need', the latter of which, deconstructs the original para 3.15 et seq., and the separate Paper on the failure of the Liverpool University Report (LU2) to justify there NOT being 'Exceptional Circumstances'.</p> <p>WGSA and Professor Gregg (and other WGSA and allied population and planning experts) would be willing to continue liaising with WMBC in order to reach a realistic 'Housing Need' figure and related other modifications with the intention of completing the exercise in a short period and resulting in a truly 'sound' Local Plan, one which matches the real needs of Wirral.</p> <p>Para 2.7 supports the exceptional circumstances to avoid the use of the standard method for calculating housing need.</p>

<p>It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>Below I give the reasoning why I should participate in hearing session(s) as a member of the WGSA Team and then why WGSA should have a participating Team:</p> <p>Having seen individuals and Groups struggling to communicate effectively with the Council over the emerging Local Plan, three years ago I, as Planning Rep for ITPAS (Irby, Thurstaston &amp; Pensby Amenity Society) became co-founder and Convenor of WGSA (Wirral Green Space Alliance) in order to co-ordinate the work and liaison with outside and in-house experts (including nationally-renowned Population experts and government advisers Prof Ludi Simpson and Piers Elias, WGSA's own Prof David Gregg, Hilary Ash of Wirral &amp; Cheshire Wildlife, Planning Consultant Jackie Copley of CPRE and The Wirral Society, and our legal advisers); also, to organise responses to and direct contact with the Council and to ramp up political pressure. The Alliance quickly grew to 31 local Groups, held regular meetings and communicated extensively online.</p> <p>For several years I and others have been providing the Council with detailed argument in respect of serious flaws with their 'Housing Need' figures, former Spatial Strategy, lack of Air Quality Monitoring and action, the need to properly address the huge disparity across the Peninsula and long-overdue need for extensive Regeneration, and other matters. Through campaigns and political pressure, WGSA managed to effect a change of Local Political Control, and the minority Lead Party thereafter announced in Council that they needed to listen to and involve WGSA in the emerging Local Plan going forward. In short order, WGSA was able to convince the Council of the need to change their LP approach significantly, to one that was 'Regeneration-led', 'Brownfield-first' and had no requirement to Release Green Belt (or other 'greenspaces') for development. After a period of Officer and Consultant research and much hard work, the Council were convinced of the revised approach and after considerable further work and thorough review of earlier Evidence Documents and the production of new ones, we were pleased to witness the Council 'owning' the strategy and defending it fiercely.</p> <p>This said, there remained areas of the emerging Local Plan which WGSA argued needed modifying. This remains the case with 'Housing Need', Housing Supply Side, 'Air Quality', Greenspaces including Green Belt, Environmental matters and some other issues. These and more have been addressed in WGSA Group and Members' DLP 'Representations'. Several incorporate our lengthy, detailed and complex Reports, where the presence of the authors and other WGSA representatives participating in the hearing session(s) may be of added value, and provide the opportunity for them to give updates on recent events including further releases of 2021 Census Data, as required.</p> <p>-----</p> <p>Wirral Green Space Alliance (WGSA) is a consortium of 31 local groups, representing over 5,000 members who wish the deplorable long-term disparity across the Peninsula to be at last addressed by regeneration of run-down areas of nationally-high deprivation, poor living conditions and adverse health outcomes (including a 10-year shorter life-expectancy), and Wirral's actual Housing Need to be delivered through regeneration together with some further development within other existing urban areas. This action would have the consequential benefit WGSA also seeks in its opposition to unjustified loss of greenspace for development.</p> <p>What WGSA recommends is a positive housing need figure that will support regeneration and levelling up and the desirable consequence of protecting all of Wirral's green space, including Green Belt, for the benefit of all in the future.</p>



	<p>WGSA strongly supports the Local Plan Submission Draft to be progressed to adoption; however, it is strongly opposed to the imposition of the vastly-inflated housing requirement, which unduly risks Wirral's greenspace for development in the event that the Council fails the "Housing Delivery Test" in the future, made more likely by the overstated 'Housing Need' figure, and where greenspace/Green Belt release and development would stall or frustrate the worthy Regeneration and 'levelling-up' agenda.</p> <p>After the 2019 Local Elections, when WGSA actions were largely responsible for both the change of local political control and the Local Plan approach (from mass housebuilding in Green Belt to a Regeneration-led one), the Council announced that it had to listen to and involve WGSA going forward. Throughout all stages since then, WGSA and WMBC have debated progress of the DLP with great success except for formal agreement on the real 'Housing Need'. It would seem to be a natural continuation of our relationship with the Council and the emerging Local Plan, for WGSA to have a small Team participating in hearing session(s) on what has been our major concern. There are a few other matters where we would appreciate participation in hearing sessions, separately or in combination with our principal objection (the inflated 'Housing Need').</p> <p>The WGSA Team at LP Examination would ideally be headed by WGSA's Barrister Killian Garvey (King's Chamber) and supported by Prof David Gregg (on Housing Need, Air Quality and Heritage), our Wirral &amp; Cheshire Wildlife Rep, Hilary Ash, who has assisted the Council for many years on a voluntary basis with its Environmental Strategies and Policies, and Jackie Copley, our Planning Consultant and representative of CPRE and The Wirral Society, plus John Heath (retired Architect and WGSA Founder/Convenor).</p> <p>We support an Adopted Local Plan, with a realistic housing requirement to enable Wirral Council to better steer sustainable development, and in doing so, conserve Wirral's green spaces for the enjoyment and benefit of all in the future.</p> <p>At the time of drafting over 22,000 people had signed WGSA petitions saying no to releasing Green Belt land for development – Brownfield First!  <a href="https://www.change.org/p/councillor-janette-williamson-say-no-to-releasing-wirral-s-green-belt-land-for-development-brownfield-first">https://www.change.org/p/councillor-janette-williamson-say-no-to-releasing-wirral-s-green-belt-land-for-development-brownfield-first</a></p>
<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      Yes</p> <p>*      No</p>	Yes

<b>Comment ID</b>	LPSD-497
<b>Person ID</b>	1311854
<b>Include files</b>	<a href="#">LPSD-217,229,242,246,258,497 &amp; 506-Heath-Redacted.pdf</a> <a href="#">LPSD-217,222,226,229,493,495-497,499-501 &amp; 503-Heath_Redacted.pdf</a>
<b>Consultee Name</b>	Mr John Heath
<b>Position</b>	Planning Rep & Convenor and Steering Group Member
<b>Company / Organisation</b>	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Part 2
<b>Title</b>	The Places and Our Vision
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
<b>Please state which paragraph number(s) this representation relates to.</b>	Para 2.10
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this</b>	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not 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	Para 2.10: The more significant statistic here is that almost 40% of Wirral Residents who are in employment commute off-Peninsula for their work. This produces a high amount of polluting vehicle journeys and mileage, and traffic congestion at peak times. Were there a significant increase in employment on Wirral, this could see commuters choosing to take up the new local opportunities, which could lead to these damaging figures actually reducing, with both the Air Quality and work/life balance improving. Further, this type of change in the employment and commuting pattern would not involve a need for additional Housing Stock as those involved would already be Residents of Wirral. Only after this 'slack' were taken up and/or Residents'

<p><b>as precise as possible.</b></p>	<p>incomes had risen significantly would additional housing be required to address economic growth – i.e., a pro-rata reduced rate. This factor is yet another reason why the Council's 'Housing Need' figure in excess of 13,000 is absurd and a great and damaging exaggeration which can only do harm if not reduced to sensible levels through a 'Main Modification'.</p> <p>Para 2.13 and Policy WS 1.1 (also Para 2.6 refers): Empty Homes back into Use:</p> <p>This paragraph (2.13) touches on one element of the Council's understatement of the Supply Side for Housing, namely 'Empty Homes'. Wirral has (according to the SHMA 2020 and other sources) around 150,000 dwellings and a vacancy rate of circa 3.3%, which is 33% higher than the national average of 2.5%. This means just under 5,000 homes are 'empty' but Wirral has an exemplar, consistent record over 10 years of both a commitment to address this dreadful "waste" and a recorded delivery of over 250 'Empty Homes back into Use' each and every year (278 in the last full pre-Covid year). This should surely mean that it would be entirely reasonable and safe to include within the Local Plan a net supply of, say, 200 additional homes per annum (or 1,000 homes in the first 5-Year Period or 3,200 additional homes over the 16-year period of the Plan) through continuation of the commitment, programme and sustained delivery of 'Empty Homes back into Use'. However, fearing the whole category might be discounted, the DLP only includes less than 50% of the proven, consistent Delivery over the past decade. See also Policy WS 1.1, Page 57, which shows just 490 + 440 + 480 net additions for the Plan periods of 5, 5 and 6 years, or only 1,410 additional homes in all. We do not consider this to be reasonable, particularly as there are other contingencies on the Supply Side (Delivery Totals) including an arbitrary overall 10% discount (pulled out of thin air). This is contingency upon contingency, but it should give further confidence in the Council's ability to deliver in excess of the number of dwellings to meet the actual 'Housing Need' of Wirral.</p>
<p><b>omplies with the Duty to co-operate</b>  *        Yes  *        No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the</b></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 Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Although WGSA call for a 'Main Modification' regarding issues and consequences around the highly inflated 'Housing Need' figure, this requires much more than a simple edit of the DLP text. The commentary to earlier Questions outlines the magnitude and absolute necessity for modification of the 'Housing Number' and 'Housing Requirement' justified by grounds including the clear fact that there ARE 'Exceptional Circumstances' to assess the true 'Housing Need' using an alternate methodology and up-to-date datasets. This does not detract from our very strong support for the overall, 'Regeneration-led' approach and basis to the Draft Local Plan.</p> <p>Please refer to Professor David Gregg's main report and executive summary for evidence and direction regarding 'Housing Need', the latter of which, deconstructs the original para 3.15 et seq., and the separate Paper on the failure of the Liverpool University Report (LU2) to justify there NOT being 'Exceptional Circumstances'.</p> <p>WGSA and Professor Gregg (and other WGSA and allied population and planning experts) would be willing to continue liaising with WMBC in order to reach a realistic 'Housing Need' figure and related other modifications with the intention of completing the exercise in a short period and resulting in a truly 'sound' Local Plan, one which matches the real needs of Wirral.</p> <p>para 2.10: The more significant statistic here is that almost 40% of Wirral Residents who are in employment commute off-Peninsula for their work. This produces a high amount of polluting vehicle journeys and mileage, and traffic congestion at peak times. Were there a significant increase in employment on Wirral, this could see commuters choosing to take up the new local opportunities, which could lead to these damaging figures actually reducing, with both the Air Quality and work/life balance improving. Further, this type of change in the employment and commuting pattern would not involve a need for additional Housing Stock as those involved would already be Residents of Wirral. Only after this 'slack' were taken up and/or Residents' incomes had risen significantly would additional housing be required to address economic growth – i.e., a pro-rata reduced rate. This factor is yet another reason why the Council's 'Housing Need' figure in excess of 13,000 is absurd and a great and damaging exaggeration which can only do harm if not reduced to sensible levels through a 'Main Modification'.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in</p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>hearing session(s) * Yes, I wish to participate in hearing session(s)</p>	
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	<p>Below I give the reasoning why I should participate in hearing session(s) as a member of the WGSA Team and then why WGSA should have a participating Team:</p> <p>Having seen individuals and Groups struggling to communicate effectively with the Council over the emerging Local Plan, three years ago I, as Planning Rep for ITPAS (Irby, Thurstaston &amp; Pensby Amenity Society) became co-founder and Convenor of WGSA (Wirral Green Space Alliance) in order to co-ordinate the work and liaison with outside and in-house experts (including nationally-renowned Population experts and government advisers Prof Ludi Simpson and Piers Elias, WGSA's own Prof David Gregg, Hilary Ash of Wirral &amp; Cheshire Wildlife, Planning Consultant Jackie Copley of CPRE and The Wirral Society, and our legal advisers); also, to organise responses to and direct contact with the Council and to ramp up political pressure. The Alliance quickly grew to 31 local Groups, held regular meetings and communicated extensively online.</p> <p>For several years I and others have been providing the Council with detailed argument in respect of serious flaws with their 'Housing Need' figures, former Spatial Strategy, lack of Air Quality Monitoring and action, the need to properly address the huge disparity across the Peninsula and long-overdue need for extensive Regeneration, and other matters. Through campaigns and political pressure, WGSA managed to effect a change of Local Political Control, and the minority Lead Party thereafter announced in Council that they needed to listen to and involve WGSA in the emerging Local Plan going forward. In short order, WGSA was able to convince the Council of the need to change their LP approach significantly, to one that was 'Regeneration-led', 'Brownfield-first' and had no requirement to Release Green Belt (or other 'greenspaces') for development. After a period of Officer and Consultant research and much hard work, the Council were convinced of the revised approach and after considerable further work and thorough review of earlier Evidence Documents and the production of new ones, we were pleased to witness the Council 'owning' the strategy and defending it fiercely.</p> <p>This said, there remained areas of the emerging Local Plan which WGSA argued needed modifying. This remains the case with 'Housing Need', Housing Supply Side, 'Air Quality', Greenspaces including Green Belt, Environmental matters and some other issues. These and more have been addressed in WGSA Group and Members' DLP 'Representations'. Several incorporate our lengthy, detailed and complex Reports, where the presence of the authors and other WGSA representatives participating in the hearing session(s) may be of added value, and provide the opportunity for them to give updates on recent events including further releases of 2021 Census Data, as required.</p> <p>-----</p> <p>Wirral Green Space Alliance (WGSA) is a consortium of 31 local groups, representing over 5,000 members who wish the deplorable long-term disparity across the Peninsula to be at last addressed by regeneration of run-down areas of nationally-high deprivation, poor living conditions and adverse health outcomes (including a 10-year shorter life-expectancy), and Wirral's actual Housing Need to be delivered through regeneration together with some further development within other existing urban areas. This action would have the consequential benefit WGSA also seeks in its opposition to unjustified loss of greenspace for development.</p> <p>What WGSA recommends is a positive housing need figure that will support regeneration and levelling up and the desirable consequence of protecting all of Wirral's green space, including Green Belt, for the benefit of all in the future.</p> <p>WGSA strongly supports the Local Plan Submission Draft to be progressed to adoption; however, it is strongly opposed to the imposition of the vastly-inflated housing requirement, which unduly risks Wirral's greenspace for development in the event that the Council fails the "Housing Delivery Test" in the future, made more likely by the overstated 'Housing Need' figure, and where greenspace/Green Belt release and development would stall or frustrate the worthy Regeneration and 'levelling-up' agenda.</p> <p>After the 2019 Local Elections, when WGSA actions were largely responsible for both the change of local political control and the Local Plan approach (from mass housebuilding in Green Belt to a Regeneration-led one), the Council announced that it had to listen to and involve WGSA going forward. Throughout all stages since then, WGSA and WMBC have debated progress of the DLP with great success except for formal agreement on the real 'Housing Need'. It would seem to be a natural continuation of our relationship with the Council and the emerging Local Plan, for WGSA to have a small Team participating in hearing session(s) on what has been our major concern. There are a few other matters where we would appreciate participation in hearing sessions, separately or in combination with our principal objection (the inflated 'Housing Need').</p>

	<p>The WGSa Team at LP Examination would ideally be headed by WGSa's Barrister Killian Garvey (King's Chamber) and supported by Prof David Gregg (on Housing Need, Air Quality and Heritage), our Wirral &amp; Cheshire Wildlife Rep, Hilary Ash, who has assisted the Council for many years on a voluntary basis with its Environmental Strategies and Policies, and Jackie Copley, our Planning Consultant and representative of CPRE and The Wirral Society, plus John Heath (retired Architect and WGSa Founder/Convenor).</p> <p>We support an Adopted Local Plan, with a realistic housing requirement to enable Wirral Council to better steer sustainable development, and in doing so, conserve Wirral's green spaces for the enjoyment and benefit of all in the future.</p> <p>At the time of drafting over 22,000 people had signed WGSa petitions saying no to releasing Green Belt land for development – Brownfield First!  <a href="https://www.change.org/p/councillor-janette-williamson-say-no-to-releasing-wirral-s-green-belt-land-for-development-brownfield-first">https://www.change.org/p/councillor-janette-williamson-say-no-to-releasing-wirral-s-green-belt-land-for-development-brownfield-first</a></p>
<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*        Yes</p> <p>*        No</p>	<p>Yes</p>

<b>Comment ID</b>	LPSD-498
<b>Person ID</b>	1311854
<b>Include files</b>	
<b>Consultee Name</b>	Mr John Heath
<b>Position</b>	Planning Rep & Convenor and Steering Group Member
<b>Company / Organisation</b>	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Part 2
<b>Title</b>	The Places and Our Vision
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
<b>Please state which paragraph number(s) this representation relates to.</b>	2.13
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	



<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> * Yes * No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> * Yes * No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	Para 2.13 and Policy WS 1.1 (also Para 2.6 refers): Empty Homes back into Use:  This paragraph (2.13) touches on one element of the Council's understatement of the Supply Side for Housing, namely 'Empty Homes'. Wirral has (according to the SHMA 2020 and other sources) around 150,000 dwellings and a vacancy rate of circa 3.3%, which is 33% higher than the national average of 2.5%. This means just under 5,000 homes are 'empty' but Wirral has an exemplar, consistent record over 10 years of both a commitment to address this dreadful "waste" and a recorded delivery of over 250 'Empty Homes back into Use' each and every year (278 in the last full pre-Covid year). This should surely mean that it would be entirely reasonable and safe to include within the Local Plan a net supply of, say, 200 additional homes per annum (or 1,000 homes in the first 5-Year Period or 3,200 additional homes over the 16-year period of the Plan) through continuation of the commitment, programme and sustained delivery of 'Empty Homes back into Use'. However, fearing the whole category might be discounted, the DLP only includes less than 50% of the proven, consistent Delivery over the past

	decade. See also Policy WS 1.1, Page 57, which shows just 490 + 440 + 480 net additions for the Plan periods of 5, 5 and 6 years, or only 1,410 additional homes in all. We do not consider this to be reasonable, particularly as there are other contingencies on the Supply Side (Delivery Totals) including an arbitrary overall 10% discount (pulled out of thin air). This is contingency upon contingency, but it should give further confidence in the Council's ability to deliver in excess of the number of dwellings to meet the actual 'Housing Need' of Wirral.
<b>omplies with the Duty to co-operate</b> *        Yes *        No	
<b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b>	
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b>	<p>Para 2.13 and Policy WS 1.1 (also Para 2.6 refers): Empty Homes back into Use:</p> <p>This paragraph (2.13) touches on one element of the Council's understatement of the Supply Side for Housing, namely 'Empty Homes'. Wirral has (according to the SHMA 2020 and other sources) around 150,000 dwellings and a vacancy rate of circa 3.3%, which is 33% higher than the national average of 2.5%. This means just under 5,000 homes are 'empty' but Wirral has an exemplar, consistent record over 10 years of both a commitment to address this dreadful "waste" and a recorded delivery of over 250 'Empty Homes back into Use' each and every year (278 in the last full pre-Covid year). This should surely mean that it would be entirely reasonable and safe to include within the Local Plan a net supply of, say, 200 additional homes per annum (or 1,000 homes in the first 5-Year Period or 3,200 additional homes over the 16-year period of the Plan) through continuation of the commitment, programme and sustained delivery of 'Empty Homes back into Use'. However, fearing the whole category might be discounted, the DLP only includes less than 50% of the proven, consistent Delivery over the past decade. See also Policy WS 1.1, Page 57, which shows just 490 + 440 + 480 net additions for the Plan periods of 5, 5 and 6 years, or only 1,410 additional homes in all. We do not consider this to be reasonable, particularly as there are other contingencies on the Supply Side (Delivery Totals) including an arbitrary overall 10% discount (pulled out of thin air). This is contingency upon contingency, but it should give further confidence in the Council's ability to deliver in excess of the number of dwellings to meet the actual 'Housing Need' of Wirral.</p>
<b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</b>	
<b>Please set out the modification(s) you consider necessary</b>	Although WGSAs call for a 'Main Modification' regarding issues and consequences around the highly inflated 'Housing Need' figure, this requires much more than a simple edit of the DLP text. The commentary to earlier Questions outlines the magnitude and absolute

<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>necessity for modification of the 'Housing Number' and 'Housing Requirement' justified by grounds including the clear fact that there ARE 'Exceptional Circumstances' to assess the true 'Housing Need' using an alternate methodology and up-to-date datasets. This does not detract from our very strong support for the overall, 'Regeneration-led' approach and basis to the Draft Local Plan.</p> <p>Please refer to Professor David Gregg's main report and executive summary for evidence and direction regarding 'Housing Need', the latter of which, deconstructs the original para 3.15 et seq., and the separate Paper on the failure of the Liverpool University Report (LU2) to justify there NOT being 'Exceptional Circumstances'.</p> <p>WGSA and Professor Gregg (and other WGSA and allied population and planning experts) would be willing to continue liaising with WMBC in order to reach a realistic 'Housing Need' figure and related other modifications with the intention of completing the exercise in a short period and resulting in a truly 'sound' Local Plan, one which matches the real needs of Wirral.</p> <p>it would be entirely reasonable and safe to include within the Local Plan a net supply of, say, 200 additional homes per annum (or 1,000 homes in the first 5-Year Period or 3,200 additional homes over the 16-year period of the Plan) through continuation of the commitment, programme and sustained delivery of 'Empty Homes back into Use'. However, fearing the whole category might be discounted, the DLP only includes less than 50% of the proven, consistent Delivery over the past decade. See also Policy WS 1.1, Page 57, which shows just 490 + 440 + 480 net additions for the Plan periods of 5, 5 and 6 years, or only 1,410 additional homes in all. We do not consider this to be reasonable, particularly as there are other contingencies on the Supply Side (Delivery Totals) including an arbitrary overall 10% discount (pulled out of thin air). This is contingency upon contingency, but it should give further confidence in the Council's ability to deliver in excess of the number of dwellings to meet the actual 'Housing Need' of Wirral.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>If you wish to participate in the</p>	<p>Below I give the reasoning why I should participate in hearing session(s) as a member of the WGSA Team and then why WGSA should have a participating Team:</p>

<p><b>hearing session(s), please outline why you consider this to be necessary:</b></p>	<p>Having seen individuals and Groups struggling to communicate effectively with the Council over the emerging Local Plan, three years ago I, as Planning Rep for ITPAS (Irby, Thurstaston &amp; Pensby Amenity Society) became co-founder and Convenor of WGSA (Wirral Green Space Alliance) in order to co-ordinate the work and liaison with outside and in-house experts (including nationally-renowned Population experts and government advisers Prof Ludi Simpson and Piers Elias, WGSA's own Prof David Gregg, Hilary Ash of Wirral &amp; Cheshire Wildlife, Planning Consultant Jackie Copley of CPRE and The Wirral Society, and our legal advisers); also, to organise responses to and direct contact with the Council and to ramp up political pressure. The Alliance quickly grew to 31 local Groups, held regular meetings and communicated extensively online.</p> <p>For several years I and others have been providing the Council with detailed argument in respect of serious flaws with their 'Housing Need' figures, former Spatial Strategy, lack of Air Quality Monitoring and action, the need to properly address the huge disparity across the Peninsula and long-overdue need for extensive Regeneration, and other matters. Through campaigns and political pressure, WGSA managed to effect a change of Local Political Control, and the minority Lead Party thereafter announced in Council that they needed to listen to and involve WGSA in the emerging Local Plan going forward. In short order, WGSA was able to convince the Council of the need to change their LP approach significantly, to one that was 'Regeneration-led', 'Brownfield-first' and had no requirement to Release Green Belt (or other 'greenspaces') for development. After a period of Officer and Consultant research and much hard work, the Council were convinced of the revised approach and after considerable further work and thorough review of earlier Evidence Documents and the production of new ones, we were pleased to witness the Council 'owning' the strategy and defending it fiercely.</p> <p>This said, there remained areas of the emerging Local Plan which WGSA argued needed modifying. This remains the case with 'Housing Need', Housing Supply Side, 'Air Quality', Greenspaces including Green Belt, Environmental matters and some other issues. These and more have been addressed in WGSA Group and Members' DLP 'Representations'. Several incorporate our lengthy, detailed and complex Reports, where the presence of the authors and other WGSA representatives participating in the hearing session(s) may be of added value, and provide the opportunity for them to give updates on recent events including further releases of 2021 Census Data, as required.</p> <p>-----</p> <p>Wirral Green Space Alliance (WGSA) is a consortium of 31 local groups, representing over 5,000 members who wish the deplorable long-term disparity across the Peninsula to be at last addressed by regeneration of run-down areas of nationally-high deprivation, poor living conditions and adverse health outcomes (including a 10-year shorter life-expectancy), and Wirral's actual Housing Need to be delivered through regeneration together with some further development within other existing urban areas. This action would have the consequential benefit WGSA also seeks in its opposition to unjustified loss of greenspace for development.</p> <p>What WGSA recommends is a positive housing need figure that will support regeneration and levelling up and the desirable consequence of protecting all of Wirral's green space, including Green Belt, for the benefit of all in the future.</p> <p>WGSA strongly supports the Local Plan Submission Draft to be progressed to adoption; however, it is strongly opposed to the imposition of the vastly-inflated housing requirement, which unduly risks Wirral's greenspace for development in the event that the Council fails the "Housing Delivery Test" in the future, made more likely by the overstated 'Housing Need' figure, and where greenspace/Green Belt release and development would stall or frustrate the worthy Regeneration and 'levelling-up' agenda.</p> <p>After the 2019 Local Elections, when WGSA actions were largely responsible for both the change of local political control and the Local Plan approach (from mass housebuilding in Green Belt to a Regeneration-led one), the Council announced that it had to listen to and involve WGSA going forward. 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There are a few other matters where we would appreciate participation in hearing sessions, separately or in combination with our principal objection (the inflated 'Housing Need').</p> <p>The WGSA Team at LP Examination would ideally be headed by WGSA's Barrister Killian Garvey (King's Chamber) and supported by Prof David Gregg (on Housing Need, Air Quality and Heritage), our Wirral &amp; Cheshire Wildlife Rep, Hilary Ash, who has assisted the Council for many years on a voluntary basis with its Environmental Strategies and Policies, and Jackie Copley, our Planning Consultant and representative of CPRE and The Wirral Society, plus John Heath (retired Architect and WGSA Founder/Convenor).</p> <p>We support an Adopted Local Plan, with a realistic housing requirement to enable Wirral Council to better steer sustainable development, and in doing so, conserve Wirral's green spaces for the enjoyment and benefit of all in the future.</p> <p>At the time of drafting over 22,000 people had signed WGSA petitions saying no to releasing Green Belt land for development – Brownfield First! <a href="https://www.change.org/p/councillor-janette-williamson-say-no-to-releasing-wirral-s-green-belt-land-for-development-brownfield-first">https://www.change.org/p/councillor-janette-williamson-say-no-to-releasing-wirral-s-green-belt-land-for-development-brownfield-first</a></p>
<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the</b></p>	<p>Yes</p>

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

**\* Yes**

**\* No**

<b>Comment ID</b>	LPSD-499
<b>Person ID</b>	1311854
<b>Include files</b>	<a href="#">LPSD-217,222,226,229,493,495-497,499-501&amp;503-Heath_Redacted.pdf</a>
<b>Consultee Name</b>	Mr John Heath
<b>Position</b>	Planning Rep & Convenor and Steering Group Member
<b>Company / Organisation</b>	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Part 2
<b>Title</b>	The Places and Our Vision
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
<b>Please state which paragraph number(s) this representation relates to.</b>	2.39 Strategic Objectives
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	

<b>Please state which Policies Map (Inset Map number(s)) this representation relates to.</b>	
<b>Legally compliant</b> *        Yes *        No	
<b>Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.</b>	
<b>Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.</b>	
<b>Sound</b> *        Yes *        No	No
<b>Please give details of why you consider the Local Plan is sound. Please be as precise as possible.</b>	
<b>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</b> *        Not Positively Prepared *        Not Justified *        Not Effective *        Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective
<b>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</b>	<p>The role of Green Belt in regeneration: Paras 2.34 to 2.38 inclusive:</p> <p>ITPAS and WGSA strongly support these assertions and conclusions and have been promoting them with even greater emphasis for the many years of failed attempts since 2000 to produce a Wirral Local Plan. The great hope is that the worthiness and practicality of this current Draft Local Plan may be realised and supported by the Local Plan Inspectorate albeit with a 'Main Modification' addressing the scale of the inflated 'Housing Need'.</p> <p>The Strategic Objectives of the Local Plan: Pages 40 to 42 and Para 2.39 and Para 3.1, SO7 and SO10.</p> <p>General Comment 1: The dark green backgrounds to the fine black text make reading difficult (as printed), especially for those with any degree of visual impairment, age-related or otherwise. The background colour used is not in line with those preferred/advised by visually impaired Bodies.</p>

	<p>General Comment 2: The numbering suggests a priority order which is considered inappropriate. SO10 would be our first priority – the reduction of social, economic and environmental deprivation. However, the Council's actual priorities are mentioned at the start of Para 3.1 and are supported.</p> <p>Strategic Objective SO7: The DLP does NOT comply with this Objective in the view of both ITPAS and WGSA. There has been no consideration, work done or discussion with others (including WGSA) carried out by the Council to enable it to assert that there are “identified local housing needs”. It has not undertaken exercises to establish Wirral's ‘Objectively Assessed Needs’, which should be the ‘starting point’ to assessing the ‘Housing Requirement’ (which is often not appreciated to be a very different entity, according to Local Government Guidance). All it has done is to take without question the result of applying (the now out-of-date and discredited) 2014 ONS Data to the (now out-of-date and discredited) Standard Method. They have not complied with the former Secretary of State's written directions to take such a result as the ‘starting point’ against which to argue its local case of need, as ‘Exceptional Circumstances’ clearly do exist (contrary to the University of Liverpool's flawed Reports and Conclusions), in spite of the SoS identifying possible constraints including geographical and Green Belt. There has been no proper analyses or discussion of the work of others, including WGSA's Prof David Gregg or nationally-renowned Population Studies expert Prof Ludi Simpson and others. Prof Gregg has made separate and detailed ‘Representations’ both at this Stage and regularly over recent years, and attaches his major Study. The Report of Prof Simpson (not released by the Council for around 12 months), which arrays different scenarios and concludes that the real ‘Housing Need’ is most likely close to that shown by Prof Gregg – nearer 4,000 in 15 years and not 12,000. Surely, the scale of the disparity in ‘Housing Need’ figures should lead to a lower ‘Housing Requirement’, one which also addresses the need for thousands of officially ‘Substandard’ homes to be replaced or upgraded.</p> <p>Strategic Objective SO10: The DLP should identify that Wirral does not presently have the air quality monitoring infrastructure in place to cover the whole area properly or even critical locations, or that can sufficiently and safely record the appropriately full range of pollutants, especially PMs (Particulate Matter) which are most destructive to health. Extensive work by Prof Gregg relates and his full Report is included in ‘Representations’ by him on behalf of WGSA and himself.</p>
<p><b>omplies with the Duty to co-operate</b></p> <p>* Yes</p> <p>* No</p>	
<p><b>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	
<p><b>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</b></p>	
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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 comments and modifications suggested in response to Question 4b(3) give the details of what is wanted.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in</p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p><b>examination hearing session(s)?</b></p> <p>* <b>No, I do not wish to participate in hearing session(s)</b></p> <p>* <b>Yes, I wish to participate in hearing session(s)</b></p>	
<p><b>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</b></p>	<p>Below I give the reasoning why I should participate in hearing session(s) as a member of the WGSA Team and then why WGSA should have a participating Team:</p> <p>Having seen individuals and Groups struggling to communicate effectively with the Council over the emerging Local Plan, three years ago I, as Planning Rep for ITPAS (Irby, Thurstaston &amp; Pensby Amenity Society) became co-founder and Convenor of WGSA (Wirral Green Space Alliance) in order to co-ordinate the work and liaison with outside and in-house experts (including nationally-renowned Population experts and government advisers Prof Ludi Simpson and Piers Elias, WGSA's own Prof David Gregg, Hilary Ash of Wirral &amp; Cheshire Wildlife, Planning Consultant Jackie Copley of CPRE and The Wirral Society, and our legal advisers); also, to organise responses to and direct contact with the Council and to ramp up political pressure. The Alliance quickly grew to 31 local Groups, held regular meetings and communicated extensively online.</p> <p>For several years I and others have been providing the Council with detailed argument in respect of serious flaws with their 'Housing Need' figures, former Spatial Strategy, lack of Air Quality Monitoring and action, the need to properly address the huge disparity across the Peninsula and long-overdue need for extensive Regeneration, and other matters. Through campaigns and political pressure, WGSA managed to effect a change of Local Political Control, and the minority Lead Party thereafter announced in Council that they needed to listen to and involve WGSA in the emerging Local Plan going forward. In short order, WGSA was able to convince the Council of the need to change their LP approach significantly, to one that was 'Regeneration-led', 'Brownfield-first' and had no requirement to Release Green Belt (or other 'greenspaces') for development. After a period of Officer and Consultant research and much hard work, the Council were convinced of the revised approach and after considerable further work and thorough review of earlier Evidence Documents and the production of new ones, we were pleased to witness the Council 'owning' the strategy and defending it fiercely.</p> <p>This said, there remained areas of the emerging Local Plan which WGSA argued needed modifying. This remains the case with 'Housing Need', Housing Supply Side, 'Air Quality', Greenspaces including Green Belt, Environmental matters and some other issues. These and more have been addressed in WGSA Group and Members' DLP 'Representations'. Several incorporate our lengthy, detailed and complex Reports, where the presence of the authors and other WGSA representatives participating in the hearing session(s) may be of added value, and provide the opportunity for them to give updates on recent events including further releases of 2021 Census Data, as required.</p> <p>-----</p> <p>Wirral Green Space Alliance (WGSA) is a consortium of 31 local groups, representing over 5,000 members who wish the deplorable long-term disparity across the Peninsula to be at last addressed by regeneration of run-down areas of nationally-high deprivation, poor living conditions and adverse health outcomes (including a 10-year shorter life-expectancy), and Wirral's actual Housing Need to be delivered through regeneration together with some further development within other existing urban areas. This action would have the consequential benefit WGSA also seeks in its opposition to unjustified loss of greenspace for development.</p> <p>What WGSA recommends is a positive housing need figure that will support regeneration and levelling up and the desirable consequence of protecting all of Wirral's green space, including Green Belt, for the benefit of all in the future.</p> <p>WGSA strongly supports the Local Plan Submission Draft to be progressed to adoption; however, it is strongly opposed to the imposition of the vastly-inflated housing requirement, which unduly risks Wirral's greenspace for development in the event that the Council fails the "Housing Delivery Test" in the future, made more likely by the overstated 'Housing Need' figure, and where greenspace/Green Belt release and development would stall or frustrate the worthy Regeneration and 'levelling-up' agenda.</p> <p>After the 2019 Local Elections, when WGSA actions were largely responsible for both the change of local political control and the Local Plan approach (from mass housebuilding in Green Belt to a Regeneration-led one), the Council announced that it had to listen to and involve WGSA going forward. Throughout all stages since then, WGSA and WMBC have debated progress of the DLP with great success except for formal agreement on the real 'Housing Need'. It would seem to be a natural continuation of our relationship with the Council and the</p>

	<p>emerging Local Plan, for WGSa to have a small Team participating in hearing session(s) on what has been our major concern. There are a few other matters where we would appreciate participation in hearing sessions, separately or in combination with our principal objection (the inflated 'Housing Need').</p> <p>The WGSa Team at LP Examination would ideally be headed by WGSa's Barrister Killian Garvey (King's Chamber) and supported by Prof David Gregg (on Housing Need, Air Quality and Heritage), our Wirral &amp; Cheshire Wildlife Rep, Hilary Ash, who has assisted the Council for many years on a voluntary basis with its Environmental Strategies and Policies, and Jackie Copley, our Planning Consultant and representative of CPRE and The Wirral Society, plus John Heath (retired Architect and WGSa Founder/Convenor).</p> <p>We support an Adopted Local Plan, with a realistic housing requirement to enable Wirral Council to better steer sustainable development, and in doing so, conserve Wirral's green spaces for the enjoyment and benefit of all in the future.</p> <p>At the time of drafting over 22,000 people had signed WGSa petitions saying no to releasing Green Belt land for development – Brownfield First!  <a href="https://www.change.org/p/councillor-janette-williamson-say-no-to-releasing-wirral-s-green-belt-land-for-development-brownfield-first">https://www.change.org/p/councillor-janette-williamson-say-no-to-releasing-wirral-s-green-belt-land-for-development-brownfield-first</a></p>
<p><b>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</b></p> <p>*      Yes</p> <p>*      No</p>	Yes

<b>Comment ID</b>	LPSD-500
<b>Person ID</b>	1311854
<b>Include files</b>	<a href="#">LPSD-217,222,226,229,493,495-497,499-501&amp; 503-Heath_Redacted.pdf</a>
<b>Consultee Name</b>	Mr John Heath
<b>Position</b>	Planning Rep & Convenor and Steering Group Member
<b>Company / Organisation</b>	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
<b>Agent ID</b>	
<b>Agent Name</b>	
<b>Position</b>	
<b>Company / Organisation</b>	
<b>Number</b>	Part 2
<b>Title</b>	The Places and Our Vision
<b>To which part of the Local Plan does this representation relate?</b> * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
<b>Please state which paragraph number(s) this representation relates to.</b>	2.39 Strategic Objectives
<b>Please state which Policy Number this representation relates to.</b>	
<b>Please state which Site ID/Reference this representation relates to.</b>	

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



and adoption of the  
Plan).

\* Yes

\* No