

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

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
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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
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	SO7 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 All it has done is to take without question the result of applying (the now out-of-date and discredited) 2014 ONS Data to the (now out-of-date and discredited) Standard Method.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

	<p>has been no proper analyses or discussion of the work of others, including WGSAs 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>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
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<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>

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

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:

Having seen individuals and Groups struggling to communicate effectively with the Council over the emerging Local Plan, three years ago I, as Planning Rep for ITPAS (Irby, Thurstaston & Pensby Amenity Society) became co-founder and Convenor of WGSA (Wirral Green Space Alliance) in order to co-ordinate the work and liaison with outside and in-house experts (including nationally-renowned Population experts and government advisers Prof Ludi Simpson and Piers Elias, WGSA's own Prof David Gregg, Hilary Ash of Wirral & Cheshire Wildlife, Planning Consultant Jackie Copley of CPRE and The Wirral Society, and our legal advisers); also, to organise responses to and direct contact with the Council and to ramp up political pressure. The Alliance quickly grew to 31 local Groups, held regular meetings and communicated extensively online.

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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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').

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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.

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Yes

and adoption of the
Plan).

* Yes

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Person ID	1311854
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Number	Part 3
Title	Strategic Policies
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	para 3.1
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Number	Policy WS 3
Title	Strategy for Housing
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
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Please state which Policy Number this representation relates to.	WS 3 para 3.45 et seq Additional Needs Homes and Para 3.75 et seq Specialist Housing and Missed Opportunities
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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
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>Whilst it is recognised that accommodation for those requiring a higher level of aids-to-daily-living or care (C2) is outside the overall 'Housing Need' identified in paragraph 3.15, the statement in Para 3.45 might lead to the impression that dwellings for those with lower-level demands or services provided (not limited to age-related demands) are also outside of the overall 'Housing Need' identified in paragraph 3.15, which mostly they are not (being C3) despite being classed as 'Specialist Housing'. This leads us to identify a couple of further examples of 'understatement' of potential Housing Supply. Of necessity, we give merely an outline, an impression of a wider issue.</p> <p>Providers of residential care and retirement homes (including Registered Providers, RPs) have told us of difficulties in finding sites for developments they wish to build to satisfy demand. The Council needs to do better and has admitted so to WGSA in meetings. It could start with identifying more of its own sites and those of other public bodies which are suitable and either</p>

	<p>surplus to their needs or have potential for mixed development. ITPAS has in previous Consultations pointed out what it sees as missed opportunities (and part of a wider understatement of the Housing Supply Side).</p> <p>One example of the Council's own properties with long-unrealised potential is the Maintenance Yard on Arrowe Park Road. This appears poorly utilised and has for many years included a large collection of derelict buildings, surrounded by hard and soft areas. It has several notices displayed confirming it is in a dangerous state (yet periodically squatters and vandals gain access). Adding to this problem and lost opportunity, immediately to the rear is a large boarded-up, derelict Sports Pavilion Building (also thus for many years), close to another demolished smaller one. These Sites are Previously Developed Land (PDL) in Green Belt. (The adjacent golf course has its own maintenance yard and buildings). Right across the road is Landican Cemetery which also has its own large maintenance area (with possible access away from the public side/approach). Were the Corporation Yard's residual activities relocated to a combined facility at Landican Cemetery, this could release the large Corporation Yard and Buildings plus the Pavilion sites. With an area of 0.75 hectares, surrounded by views over parkland and mature woods, in close proximity to a long-established residential Home within the Park and just 500 metres from Arrowe Park Hospital and full retail outlets, this Site would make an idea location for a retirement or other residential (C3) development providing in excess of 100 homes, potentially releasing the same number of dwellings for other families, one-for-one or even at a higher ratio through conversion. This scheme could be delivered quickly as the combined facility at Landican Cemetery could be completed within months and our enquiries had found that there is keen demand for such sites from Home Providers.</p> <p>A second opportunity missed in the same vicinity is within the Arrowe Park Hospital 'previously developed land'. There are over 5 hectares of surface car parking in two main areas, the larger of which used to contain domestic scale Hospital Staff homes with pleasant woodland outlooks until being demolished for car parking and replaced by multi-storey blocks on former greenspace to the rear of the site. This amount of parking is both insufficient and unsightly. With some negotiation and a little imagination, this poor and wasteful arrangement could be replanned to encompass some surface parking but also one or two multi-storey car park buildings similar in scale to the Hospital Building incorporating a single or double basement (to reduce visual impact and increase density without increased land-take). Such development would release the majority of the current car parking area for further Hospital and/or other 'essential worker' homes and/or retirement or other C3 residences, providing in excess of another 100 homes in pleasant, 'greened-up' surroundings with a mature woodland backdrop, close to all essential facilities and services.</p> <p>Such possibilities must exist across Wirral but are not yet factored into the Council's Housing Supply Side figures, of which the understatement must be considerable; but the point being made here is not to level criticism but to point out that this understatement of Supply should add to the argument that Release of ANY Green Belt for the duration of the Local Plan and well beyond is completely unnecessary, highly undesirable and not supported by most of the 20,000+ Wirral Residents questioned and petitioned. This area adds to the total picture of the potential and understatement of 'Housing Supply', on top of the 50% discounting of 'Return to Use of Empty Homes' and the incompleteness of the 'Brownfield Register' (as indicated to the Council by several Groups and individuals in past Consultations).</p>
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in	

<p>relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>To maximise the Housing Supply Side and reduce missed opportunities, the Council should have identified a full list of Sites it owns or operates which are surplus, are planned to become surplus or have potential for different uses, especially Housing, particularly Specialist Housing and Affordable Homes. Such sites in other ownership should also have been listed to a fuller extent. We gave just two examples of the former which we consider are missed opportunities within the ITPAS Area, which we had identified previously without positive reaction. Such fuller listing would promote both the reduction in the extent of disused, underused and derelict sites and buildings which have potential but give a depressing outlook, and could satisfy part of the real Housing Need.</p> <p>Fuller listing, appraisal and action are missing and required.</p>

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

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

Comment ID	LPSD-506
Person ID	1311854
Include files	LPSD-217,229,242,246,258,497 & 506-Heath-Redacted.pdf
Consultee Name	Mr John Heath
Position	Planning Rep & Convenor and Steering Group Member
Company / Organisation	WGSA (Wirral Green Space Alliance) & ITPAS (Irby, Thurstaston & Pensby Amenity Society)
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 3.3
Title	Affordable Housing Requirements
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.3 and para 3.53
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Affordable Housing: Para 3.53: The sources for the "identified need for 374 affordable homes each year in Wirral." are out-of-date or partly compromised and contribute to the overstatement of 'Housing Requirement' - the actual figure should be much lower, circa 100. The Reader is directed to the full Report of Prof. David Gregg of WGSA appended to his separate and our earlier 'Representations'; also here.

<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</p>	<p>2. All references to Affordable Housing requirement need editing following reassessment with up-to-date data and methodology, with the inflated annual requirement of 374dpa being reduced significantly to the more realistic number set out in Prof Gregg's main Report, thereby lessening the risk of failing to provide what is not necessary.</p>

<p>any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>Below I give the reasoning why I should participate in hearing session(s) as a member of the WGSA Team and then why WGSA should have a participating Team:</p> <p>Having seen individuals and Groups struggling to communicate effectively with the Council over the emerging Local Plan, three years ago I, as Planning Rep for ITPAS (Irby, Thurstaston & Pensby Amenity Society) became co-founder and Convenor of WGSA (Wirral Green Space Alliance) in order to co-ordinate the work and liaison with outside and in-house experts (including nationally-renowned Population experts and government advisers Prof Ludi Simpson and Piers Elias, WGSA's own Prof David Gregg, Hilary Ash of Wirral & Cheshire Wildlife,</p>

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.

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

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

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

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

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

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

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

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

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

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

Yes

recommendations
and adoption of the
Plan).

* Yes
* No

Comment ID	LPSD-507
Person ID	1237771
Include files	LPSD-507-EM-Clarke Form 2207_Redacted.pdf
Consultee Name	Mr Terence Clarke
Position	
Company / Organisation	Residents(other than of Grange Hall) of Grange Old Road
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WP 6.3
Title	Residential Sites
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	RES SA 6.4

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	No
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Council's decision/intention to lift restrictive covenants on land in question (SHLAA 3009 and 0916) not legally compliant. Council's non compliance with its duty to cooperate and make local residents aware during the Council's drafting of its Local Plan 2021-2036 (RES-SA6/WP 6.2 and 6.3 of its proposal). The above and other decisions and failures by the Council including its failures to disclose information/communications with the owners of the land in question regarding the lifting of the restrictive covenant are referable to the Administrative Court (part of the Q.B. Division of the High Court) for Judicial Review.

omplies with the Duty to co-operate * Yes * No	No
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	The land in question (SHLAA 3009 and 0916) is surrounded by if not actually part of a Local wildlife site and the land itself is populated by foxes, bats and a variety of birds.
Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of	<p>The land in question (SHLAA 3009 and 0916) which is subject to the restrictive covenant but which the Council have wrongfully included in its local plan must be removed from the local plan on the grounds that the inclusion is not legally compliant or sound.</p> <p>The Ministry of Housing, Communities and Local Government published in 2018 a National Planning Policy Framework which the Council have a duty to comply with. The land in question meets all the criteria under the NPPF for it to be designated as a local green space and the Council have a legal duty to do so.</p> <p>NOTE: We are seeking a deletion of the plan.</p>

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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Comment ID	LPSD-508
Person ID	1323855
Include files	LPSD-508-EM-Roe Form 2207_Redacted.pdf LPSD-508-EM-Roe Attach 1 of 2 2207_Redacted.pdf LPSD-508-EM-Roe Attach 2 of 2 2207_Redacted.pdf
Consultee Name	Mr Maynard Rattenshaw
Position	
Company / Organisation	
Agent ID	1323854
Agent Name	Mrs Nicole Roe
Position	Director
Company / Organisation	Eden Planning
Number	Policy WS 10.6
Title	Open Space
To which part of the Local Plan does this representation relate?	Site
* Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	

Please state which Site ID/Reference this representation relates to.	OS-SA4.2
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified
Please give details of why you consider the Local Plan is	This representation refers specifically to the proposed allocation of land adjacent to 17 Pineridge Close as Urban Open Space within the draft Local Plan under proposed Policy WS10.6 (reference 'Brotherton Park and Dibbinsdale LNR' (OS-SA4.2)). The site measures approximately 0.7 ha and an indicative red line plan is provided alongside this submission.

<p>unsound. Please be as precise as possible.</p>	<p>The land at present falls under two separate allocations within the adopted Wirral Unitary Development Plan (UDP) (2000). The northern section of the site forms part of a Primarily Residential Area (Saved Policy HS4/ HS15) whilst the southern part of the site is designated Urban Greenspace (Saved Policy GR2), an allocation that is unsupported by the landowner given that there is no physical separation between the two allocations within the site itself i.e there is no fence line or other such boundary treatment.</p> <p>The site falls within the ownership of the adjacent residential property known as 17 Pineridge Close. The land is privately owned and contains outbuildings which are in active use by the landowner. The garage is used for storage and contains a car, whilst the wooden cabin is used as a multi-purpose and recreational space for the landowner's children. Whilst the site also benefits from a separate access available off Pineridge Close, the site is accessible from the main dwelling via a set of steps and a second driveway and forms an extension to the residential property at 17 Pineridge Close. The outbuildings are therefore ancillary to the main dwelling and should not be included within any open or greenspace allocation.</p> <p>In fact, it was confirmed by appeal in 1984 that the unused woodland and detached garage is in residential use (Wirral Council reference W/APP/24152S). It is, therefore, wholly unjustified for the site to be included within an Urban Greenspace or Urban Open Space Designation. Within the 2016 SHLAA the site (reference 887) was removed from Category 1 to Category 3 due to it being recognised as a private garden, meaning its continued allocation as anything but residential is unjustified.</p> <p>Draft Policy WS 10.6 states at point P. that development that would be incompatible with the continued use and benefits of the sites and facilities shown on the Policies Map will not be permitted, unless under specific circumstances. These being that the proposal would be for continued use for public amenity, sport or recreation / appropriate provision would be made for open space / an up-to-date needs assessment demonstrates that the site is not needed for any alternative identified open space or recreational purpose.</p> <p>As identified above, the site is not publicly accessible and has no community benefit. There is no use nor facilities associated with open space, sports or local green space within the site as it is wholly in private use and falls within the residential curtilage of no.17 Pineridge Close. The site cannot be accessed and used for public recreational purposes and should therefore not be considered to provide any public amenity or sport and recreational purpose.</p> <p>FThis representation refers specifically to the proposed allocation of land adjacent to 17 Pineridge Close as Urban Open Space within the draft Local Plan under proposed Policy WS10.6 (reference 'Brotherton Park and Dibbinsdale LNR' (OS-SA4.2)). The site measures approximately 0.7 ha and an indicative red line plan is provided alongside this submission.</p> <p>The land at present falls under two separate allocations within the adopted Wirral Unitary Development Plan (UDP) (2000). The northern section of the site forms part of a Primarily Residential Area (Saved Policy HS4/ HS15) whilst the southern part of the site is designated Urban Greenspace (Saved Policy GR2), an allocation that is unsupported by the landowner given that there is no physical separation between the two allocations within the site itself i.e there is no fence line or other such boundary treatment.</p> <p>The site falls within the ownership of the adjacent residential property known as 17 Pineridge Close. The land is privately owned and contains outbuildings which are in active use by the landowner. The garage is used for storage and contains a car, whilst the wooden cabin is used as a multi-purpose and recreational space for the landowner's children. Whilst the site also benefits from a separate access available off Pineridge Close, the site is accessible from the main dwelling via a set of steps and a second driveway and forms an extension to the residential property at 17 Pineridge Close. The outbuildings are therefore ancillary to the main dwelling and should not be included within any open or greenspace allocation.</p> <p>In fact, it was confirmed by appeal in 1984 that the unused woodland and detached garage is in residential use (Wirral Council reference W/APP/24152S). It is, therefore, wholly unjustified for the site to be included within an Urban Greenspace or Urban Open Space Designation. Within the 2016 SHLAA the site (reference 887) was removed from Category 1 to Category 3 due to it being recognised as a private garden, meaning its continued allocation as anything but residential is unjustified.</p> <p>Draft Policy WS 10.6 states at point P. that development that would be incompatible with the continued use and benefits of the sites and facilities shown on the Policies Map will not be permitted, unless under specific circumstances. These being that the proposal would be for continued use for public amenity, sport or recreation / appropriate provision would be made continued use for public amenity, sport or recreation / appropriate provision would be made for open space / an up-to-date needs assessment demonstrates that the site is not needed for any alternative identified open space or recreational purpose.</p> <p>As identified above, the site is not publicly accessible and has no community benefit. There is no use nor facilities associated with open space, sports or local green space within the site as it is wholly in private use and falls within the residential curtilage of no.(address redacted). The site cannot be accessed and used for public recreational purposes and should therefore not be considered to provide any public amenity or sport and recreational purpose.</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	<p>Yes</p>
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	

<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	N/A
<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>	N/A
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You</p>	<p>To make the Local Plan sound, the modification required is to remove the site in question (OS-SA4.2) from the Urban Open Space allocation within the draft Proposals Map and extend the Primarily Residential Area to include the site within the Birkenhead to Eastham Conurbation under draft policy WD10. If this is not possible, then the site should be white land within the proposals map and be removed from any green space designation.</p> <p>The site should also be assessed within the Council's SHLAA and an appropriate representation to that effect has also been made.</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>No, I do not wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the</p>	<p>Yes</p>

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

* **Yes**

* **No**

LPSP-509

Comment ID	LPSP-509
Person ID	1323857
Include files	LPSP-509-LE-Blackburn Form 1707_Redacted.pdf
Consultee Name	Sarah Blackburn
Position	
Company / Organisation	
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Appendix 18
Title	Housing Allocations of 1-9 Units
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	RES-SA5.9

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	the alley running between Arrow Hill School and Atherton Drive has been fenced off and maintained by myself since moving in in October 2007. The alley was already fenced off. Most of the alley is now registered in my name. Wirral Council have denied ownership several times.

omplies with the Duty to co-operate * Yes * No	No
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	see attached letter
Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of	The Fence running at the rear of my property at Atherton Drive and across the Alley has been there at least 14 years. This alley has been the subject of many police logs. Vandalism to my property and drug use. Approx three years ago the fourth replacement fence was erected from Steel. I spoke with a council representative at a recent meeting who suggested the boundary lines be amended.

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

<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
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LPSP-510

Comment ID	LPSP-510
Person ID	1249100
Include files	<p>LPSP-510-EM-Dennis Form 2307_Redacted.pdf</p> <p>LPSP-510,755-757,761-764-EM-Dennis Attach 1 of 32 2307_Redacted.pdf</p> <p>LPSP-510-EM-Dennis Attach 3 of 32 2307_Redacted.PDF</p> <p>LPSP-510-EM-Dennis Attach 29 of 32 2307_Redacted.pdf</p> <p>LPSP-510-EM-Dennis Attach 6 of 32 2307_Redacted.PDF</p> <p>LPSP-510-EM-Dennis Attach 9 of 32 2307_Redacted.pdf</p> <p>LPSP-510-EM-Dennis Attach 5 of 32 2307_Redacted.PDF</p> <p>LPSP-510-EM-Dennis Attach 4 of 32 2307_Redacted.PDF</p> <p>LPSP-510-EM-Dennis Attach 7 of 32 2307_Redacted.PDF</p> <p>LPSP-510-EM-Dennis Attach 8 of 32 2307_Redacted.pdf</p> <p>LPSP-510-EM-Dennis Attach 32 of 32 2307_Redacted.pdf</p> <p>LPSP-510-EM-Dennis Attach 31 of 32 2307_Redacted.pdf</p> <p>LPSP-510-EM-Dennis Attach 10 of 32 2307_Redacted.pdf</p> <p>LPSP-510-EM-Dennis Attach 11 of 32 2307_Redacted.pdf</p> <p>LPSP-510-EM-Dennis Attach 12 of 32 2307_Redacted.pdf</p> <p>LPSP-510-EM-Dennis Attach 13 of 32 2307_Redacted.pdf</p> <p>LPSP-510-EM-Dennis Attach 14 of 32 2307_Redacted.pdf</p> <p>LPSP-510-EM-Dennis Attach 16 of 32 2307_Redacted.pdf</p> <p>LPSP-510-EM-Dennis Attach 15 of 32 2307_Redacted.pdf</p> <p>LPSP-510-EM-Dennis Attach 17 of 32 2307_Redacted.pdf</p> <p>LPSP-510-EM-Dennis Attach 19 of 32 2307_Redacted.pdf</p> <p>LPSP-510-EM-Dennis Attach 2 of 32 2307_Redacted.pdf</p> <p>LPSP-510-EM-Dennis Attach 18 of 32 2307_Redacted.pdf</p> <p>LPSP-510-EM-Dennis Attach 20 of 32 2307_Redacted.pdf</p> <p>LPSP-510-EM-Dennis Attach 24 of 32 2307_Redacted.pdf</p> <p>LPSP-510-EM-Dennis Attach 22 of 32 2307_Redacted.pdf</p> <p>LPSP-510-EM-Dennis Attach 21 of 32 2307_Redacted.pdf</p> <p>LPSP-510-EM-Dennis Attach 23 of 32 2307_Redacted.pdf</p> <p>LPSP-510-EM-Dennis Attach 27 of 32 2307_Redacted.pdf</p> <p>LPSP-510-EM-Dennis Attach 25 of 32 2307_Redacted.pdf</p> <p>LPSP-510-EM-Dennis Attach 28 of 32 2307_Redacted.pdf</p> <p>LPSP-510-EM-Dennis Attach 30 of 32 2307_Redacted.pdf</p> <p>LPSP-510-EM-Dennis Attach 26 of 32 2307_Redacted.pdf</p>
Consultee Name	Gary Lynch
Position	
Company / Organisation	Russell Homes
Agent ID	1244620
Agent Name	Rebecca Dennis
Position	

Company / Organisation	Pegasus Group
Number	Part 2
Title	The Places and Our Vision
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	Vision, Development and Regeneration Strategy, WS 1.1 (Fig 3.6), WS 5.4, WS 12, WP 5.1
Please state which Site ID/Reference this representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	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	Please refer to the representations report for further details

legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	Please refer to the representations report for further details
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.	

<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	<p>Please refer to the representations report for further details</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 refer to the representations report for further details</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.</p>	<p>Please refer to the representations report for further details</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>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	Yes, I wish to participate in hearing session(s)
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:	To explain and clarify points raised in representations, and any subsequent hearing statements in response to specific questions raised by Inspector
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	Yes

Comment ID	LPSD-511
Person ID	1249450
Include files	LPSD-511, 855-EM-Josling Form 2307_Redacted.pdf
Consultee Name	Mr. Philip Josling
Position	Trustee
Company / Organisation	Wirral Footpaths and Open Spaces Preservation Society
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 1.1
Title	Homes
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1.1, Part B and C, Para 3.15-3.21
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Justified Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>Wirral Footpaths and Open Spaces Preservation Society was founded in 1888 and as the name suggests one of our chief aims is the enhancement and protection of Wirral's green spaces. WFPOSPS is a member of Wirral Green Space Alliance and fully supports the response made by WGSA to the Draft Local Plan.</p> <p>In particular we are concerned that the housing need target in the DLP is totally unrealistic, and should be revised downwards for the following reasons.</p> <ol style="list-style-type: none"> 1. It is in conflict with other measures such as the projected population change in Wirral over the period of the DLP. The Councils own statement in the DLP that the expected growth in households is 8820 over the period of the plan also conflicts with the 13,360 housing requirement stated. 2. We support the calculations of experts for the WGSA which calculate a new homes need of 4,300 over a sixteen year period including the 15 years of the DLP

	<p>3. The danger of not adopting a more realistic housing need figure is clear from the actions of developers who challenge the ability of WBC to enable development of enough brownfield land within the timescale of the DLP.</p> <p>WFPOSPS is clear that the challenges of climate change make it essential that green spaces are preserved and even extended to contribute to the struggle to keep the rise in global temperatures within safe limits.</p> <p>We support the general thrust of the DLP and in particular welcome the policy of WBC to prevent development on the Green Belt.</p> <p>In supporting the aims of the DLP to regenerate Birkenhead and other built areas, we are keen to see in the detailed plans, adequate provision of green spaces. We caution that in the likely financial pressures around regeneration over the period of the DLP, the value of green space may be compromised by the cost of preserving open areas, and we will scrutinise details where we have these concerns. We would also advocate that sufficient measures and funds are put in place to maintain any new open spaces to a high standard. Too often we have observed the lack of maintenance following a perfectly good enhancement, which leads far too soon to an inferior facility.</p> <p>WFPOSPS also supports the submission by WGSa concerning the degradation of open spaces in order to reduce the baseline of biodiversity. This is copied below.</p>
<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	<p>If an inflated housing requirement is adopted in the Wirral Local Plan, more land, including that which has not previously been identified for development, will need to come forward. This land will not benefit from consideration by the Sustainability Appraisal and there will be no certainty that it is meeting Part A of Policy WS1.1.</p> <p>This could incur harm to the important planning and environmental designations that protect much of the land in Wirral due to its significance in terms of climate emergency goals and biodiversity net gain. It is incumbent on the local plan process to support the identification of land that is sustainable to deliver future development requirements.</p>
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the</p>	<p>As above, if an inflated housing requirement is adopted in the Local Plan, there are implications for the Habitats Regulation Assessment, in that land never considered for development will be sought for residential consent by developers on a speculative basis. Harm may occur to land protected by the important planning and environmental designations that protect land of significance in terms of climate emergency goals and biodiversity net gain. It is incumbent on the local plan process to support the identification of land that is sustainable to deliver future development requirements, avoiding land protected under the Habitats Regulations Assessment.</p>

<p>accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Recommended modification for Policy WS1.1 Housing Need.</p> <p>As indicated in our comments the Housing Need calculation is defective. The 2021 census, which the Office for Statistics Regulation has determined must be used for future planning purposes, is at total variance with any housing need calculations in the DLP. This part of the plan must be revisited.</p> <p>WFPOSPS supports the evidence provided by WGSA of which it is a member.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? * No, I do not wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>

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

LPSD-512

Comment ID	LPSD-512
Person ID	1323306
Include files	LPSD-512-EM-Roberts Form 2307_Redacted.pdf
Consultee Name	Ms Cathy Roberts
Position	Research and Development
Company / Organisation	Wilkie Leisure Group Ltd
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy RA 10
Title	New Brighton Regeneration Area
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	RES-RA10.3

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
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	<p>The information presented within this document pertaining to New Palace and Adventureland – identified in the local plan as New Palace Amusements RES-RA10-3 is inaccurate and therefore misleading. The area of the site capacity is stated as being 0.5 of a hectare when in fact is it closer to 1.6.</p> <p>There is a unit figure of 40 (dwellings?) stipulated – it is unclear to how this relates to dph. It should also be noted that this information has previously been circulated to nearby residents and businesses in the form of a consultation letter.</p> <p>David Wilkie – owner of the site and Director of Wilkie Leisure Group was not consulted as a stakeholder prior to this plan being prepared.</p>

	<p>Wilkie Leisure Group has informed offices that it is proposing a mixed use tourist attraction and housing development with a dph of 70 dph (with a suggested capacity of 120 new dwellings being included within the development, as the site falls within the Waterfront Zone and the Left Bank area. This proposal also is compliant with the recommendations presented within the Wirral Final Density Report and the Left Bank Living Proposal.</p> <p>The current representation of the site in terms of size and capacity leads us to conclude that this makes the plan unsound, unjustified and ineffective.</p>
<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you</p>	<p>Urgent consultation with Wilkie Leisure Group and subsequent adjustment to the plan would as a minimum</p> <p>[Amend size and capacity of site RES-RA10.3]</p>

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

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
 * No, I do not wish to participate in hearing session(s)
 * Yes, I wish to participate in hearing session(s)

If you wish to participate in the

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

To ensure accuracy of information presented

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

LPSP-513

Comment ID	LPSP-513
Person ID	1241096
Include files	LPSP-513 & 1081-EM-Darwent Form 2407_Redacted.pdf
Consultee Name	Mrs Sue Darwent
Position	Secretary
Company / Organisation	Rectory Road Field Community Group
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 10.6
Title	Open Space
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 10.6/LGS-SA6.2
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	<p>Reference to Policy WS 10.6 Open Space (LGS – SA 6.2)</p> <p>I have done my best to support the designation of Rectory Road paddocks (Title No. MS665009) (OS Map Reference: SJ2186SE) as Local Green Space (LGS). I believe that the designation process has been sound and effectively taken forward by Wirral Borough Council, giving the local community the opportunity to be involved in deciding what is important for the area, consistent with national policy.</p> <p>The Local Plan emphasises the importance of greenspace (Policy WS 5.1), protecting and enhancing the quality of existing green infrastructure and specifically states that 'the loss of green infrastructure is unacceptable.'</p> <p>Designating the paddocks as LGS directly supports the overall Local Plan and the specific objectives for West Kirby (p.226, 5.51). Designation will preserve and enhance West Kirby (Old Village) Conservation Area. It also helps to address the local shortfall in amenity greenspace.</p> <p>I'm pleased that WBC agrees that this small area fulfils the criteria for designation:</p> <ul style="list-style-type: none"> • It is close to the community it serves. • It is an essential part of the local landscape, a tranquil green space and wooded area which together with the school playing fields, create a semi-rural appearance to the setting of the church, rectory and Ring o' Bells. • It lies within West Kirby Old Village Conservation Area. 'The red sandstone walls, woodland areas, adjacent unmade paths and lanes, and open aspect of remnant fields indicate the original character of the village which should be preserved, retained and enhanced.' (Insall, D. 2007, 2009). • Being glebe land, it has a unique heritage, and contains one of the oldest buildings in West Kirby, the tithe barn (c1712). • The beauty, history and tranquillity of the area attracts visitors, supporting the local tourist economy. • The glebe forms part of a network of greenspaces and undeveloped sites passing from Grange Hill to the north, down to Ashton Park to the west and across to Caldly Hill. Such an undisturbed habitat helps to preserve biodiversity on a local scale. <p>The original LGS application (2019) was supported by many local residents and groups including three ward councillors, our MP, members of St. Bridget's Parochial Church Council, and St Bridget's Church Centre, West Kirby Museum Chairperson, Elizabeth Davey and local historians, representatives of St. Bridget's Pre-school Committee and Trustees, and of St. Bridget's School Governors and Parents Association, Derek Longman Chair of Friends of Grange Hill, the Friends of Ashton Park, Friends of Coronation Gardens, Friends of Sandlea Park, Transition Town West Kirby, and Conservation Wirral.</p> <p>Please refer to attachment for names of members of the Rectory Road Field Community Group, consisting of 20 households who also support LGS designation:</p> <p>A Facebook group aiming to publicise and protect this green space for the future attracted over 950 members within three weeks of being set up. It currently has over 1,200 members. A petition to protect the paddocks from development was signed by over 3,000 people.</p>
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound.	

Please be as precise as possible.	
<p>If you consider that the Local Plan is not sound, please indicate the reason(s) why:</p> <ul style="list-style-type: none"> * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy 	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	
<p>omplies with the Duty to co-operate</p> <ul style="list-style-type: none"> * Yes * No 	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability	

Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of 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	

<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>	

LPSP-514

Comment ID	LPSP-514
Person ID	1323731
Include files	LPSP-514-533,1276-EM-Barton-Attach 12 of 12 2207_Redacted.pdf
Consultee Name	Mrs Brigid Edwards
Position	
Company / Organisation	Taylor Wimpey
Agent ID	1323730
Agent Name	Mr Richard Barton
Position	
Company / Organisation	Avison Young
Number	Policy WS 1.1
Title	Homes
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1.1
Please state which Site ID/Reference this	

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

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

<p>to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Appendix V1) The Soundness representations also suggests the considerable changes required to draft Policy WS 1.1 for it to meet the test of soundness. However, given the significance of this policy to the overall Local Plan strategy and the quantum of changes required, it will not be possible to rectify these fundamental soundness issues through the main modifications process.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s),</p>	<p>It is necessary for Avison Young to attend and participate in the examination, on behalf of Taylor Wimpey UK Limited, in order to discuss the technical evidence and strategy in relation to housing requirement and delivery and the need for Green Belt release.</p>

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

Comment ID	LPSD-515
Person ID	1323731
Include files	LPSD-514-533,1276-EM-Barton-Attach 12 of 12 2207_Redacted.pdf
Consultee Name	Mrs Brigid Edwards
Position	
Company / Organisation	Taylor Wimpey
Agent ID	1323730
Agent Name	Mr Richard Barton
Position	
Company / Organisation	Avison Young
Number	Policy WS 1.3
Title	Infrastructure
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1.3
Please state which Site ID/Reference this	

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

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

<p>to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>The issues with draft Policy WS 1.3 relate to the inconsistencies between the Infrastructure Delivery Plan and the CIL and Viability Assessment. This is a fundamental issue with the Local Plan's viability and will be difficult to rectify through the main modifications process</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s),</p>	<p>It is necessary for Avison Young to attend and participate in the examination, on behalf of Taylor Wimpey UK Limited, in order to discuss the technical evidence and strategy in relation to housing requirement and delivery and the need for Green Belt release.</p>

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

LPSP-516

Comment ID	LPSP-516
Person ID	1323731
Include files	LPSP-514-533,1276-EM-Barton-Attach 12 of 12 2207_Redacted.pdf
Consultee Name	Mrs Brigid Edwards
Position	
Company / Organisation	Taylor Wimpey
Agent ID	1323730
Agent Name	Mr Richard Barton
Position	
Company / Organisation	Avison Young
Number	Policy WS 2
Title	Social Value
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 2
Please state which Site ID/Reference this	

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

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

<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>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.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s),</p>	<p>It is necessary for Avison Young to attend and participate in the examination, on behalf of Taylor Wimpey UK Limited, in order to discuss the technical evidence and strategy in relation to housing requirement and delivery and the need for Green Belt release.</p>

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

Comment ID	LPSD-517
Person ID	1323731
Include files	LPSD-514-533,1276-EM-Barton-Attach 12 of 12 2207_Redacted.pdf
Consultee Name	Mrs Brigid Edwards
Position	
Company / Organisation	Taylor Wimpey
Agent ID	1323730
Agent Name	Mr Richard Barton
Position	
Company / Organisation	Avison Young
Number	Policy WS 3.1
Title	Housing Design Standards
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.1
Please state which Site ID/Reference this	

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

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

<p>Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>The CIL and Viability Assessment should be updated to take account of costs so that viability is not overstated. The Council must then identify residential sites that can viably meet the requirements of draft Policy WS 3.1. Amendments are also required to the assessment of NDSS in the evidence base as well as updating and robustly justifying the requirements for other standards.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s), please outline why</p>	<p>It is necessary for Avison Young to attend and participate in the examination, on behalf of Taylor Wimpey UK Limited, in order to discuss the technical evidence and strategy in relation to housing requirement and delivery and the need for Green Belt release.</p>

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

Comment ID	LPSD-518
Person ID	1323731
Include files	LPSD-514-533,1276-EM-Barton-Attach 12 of 12 2207_Redacted.pdf
Consultee Name	Mrs Brigid Edwards
Position	
Company / Organisation	Taylor Wimpey
Agent ID	1323730
Agent Name	Mr Richard Barton
Position	
Company / Organisation	Avison Young
Number	Policy WS 3.2
Title	Housing Density
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.2
Please state which Site ID/Reference this	

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

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

<p>Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s), please outline why</p>	<p>It is necessary for Avison Young to attend and participate in the examination, on behalf of Taylor Wimpey UK Limited, in order to discuss the technical evidence and strategy in relation to housing requirement and delivery and the need for Green Belt release.</p>

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

Comment ID	LPSD-519
Person ID	1323731
Include files	LPSD-514-533,1276-EM-Barton-Attach 12 of 12 2207_Redacted.pdf
Consultee Name	Mrs Brigid Edwards
Position	
Company / Organisation	Taylor Wimpey
Agent ID	1323730
Agent Name	Mr Richard Barton
Position	
Company / Organisation	Avison Young
Number	Policy WS 3.3
Title	Affordable Housing Requirements
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.3
Please state which Site ID/Reference this	

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

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

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

Comment ID	LPSD-520
Person ID	1323731
Include files	LPSD-514-533,1276-EM-Barton-Attach 12 of 12 2207_Redacted.pdf
Consultee Name	Mrs Brigid Edwards
Position	
Company / Organisation	Taylor Wimpey
Agent ID	1323730
Agent Name	Mr Richard Barton
Position	
Company / Organisation	Avison Young
Number	Policy WP 3.4
Title	Employment Sites
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.4
Please state which Site ID/Reference this	

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

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>to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>To address the issues raised in the Consortium's analysis, the Council would need to identify a significant number of developable sites outside of Regeneration Areas that can viably deliver family dwellings. Given the quantum of the recommended changes required to make this policy sound, it will not be possible to rectify these fundamental soundness issues through the main modifications process.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s),</p>	<p>It is necessary for Avison Young to attend and participate in the examination, on behalf of Taylor Wimpey UK Limited, in order to discuss the technical evidence and strategy in relation to housing requirement and delivery and the need for Green Belt release.</p>

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

Comment ID	LPSD-521
Person ID	1323731
Include files	LPSD-514-533,1276-EM-Barton-Attach 12 of 12 2207_Redacted.pdf
Consultee Name	Mrs Brigid Edwards
Position	
Company / Organisation	Taylor Wimpey
Agent ID	1323730
Agent Name	Mr Richard Barton
Position	
Company / Organisation	Avison Young
Number	Policy WS 5.1
Title	Green and Blue Infrastructure Networks
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 5.1
Please state which Site ID/Reference this	

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

as precise as possible.	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.
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	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.

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

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
 * No, I do not wish to participate in hearing session(s)
 * Yes, I wish to participate in hearing session(s)

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

If you wish to participate in the

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.

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

Comment ID	LPSD-522
Person ID	1323731
Include files	LPSD-514-533,1276-EM-Barton-Attach 12 of 12 2207_Redacted.pdf
Consultee Name	Mrs Brigid Edwards
Position	
Company / Organisation	Taylor Wimpey
Agent ID	1323730
Agent Name	Mr Richard Barton
Position	
Company / Organisation	Avison Young
Number	Policy WS 5.4
Title	Ecological Networks
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 5.4
Please state which Site ID/Reference this	

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

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

Comment ID	LPSD-523
Person ID	1323731
Include files	LPSD-514-533,1276-EM-Barton-Attach 12 of 12 2207_Redacted.pdf
Consultee Name	Mrs Brigid Edwards
Position	
Company / Organisation	Taylor Wimpey
Agent ID	1323730
Agent Name	Mr Richard Barton
Position	
Company / Organisation	Avison Young
Number	Policy WS 5.9
Title	Evidence of approach
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 5.9
Please state which Site ID/Reference this	

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

as precise as possible.	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.
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 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

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

Comment ID	LPSD-524
Person ID	1323731
Include files	LPSD-514-533,1276-EM-Barton-Attach 12 of 12 2207_Redacted.pdf
Consultee Name	Mrs Brigid Edwards
Position	
Company / Organisation	Taylor Wimpey
Agent ID	1323730
Agent Name	Mr Richard Barton
Position	
Company / Organisation	Avison Young
Number	Policy WS 8.1
Title	Energy Hierarchy
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 8.1
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please see submitted representations prepared by Avison Young on behalf of Taylor Wimpey UK Limited for comments on the soundness of the Local Plan and specific comments on the draft policy. refer to attachment (Land at Lever Causeway) 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>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	Yes

Comment ID	LPSD-525
Person ID	1323731
Include files	LPSD-514-533,1276-EM-Barton-Attach 12 of 12 2207_Redacted.pdf
Consultee Name	Mrs Brigid Edwards
Position	
Company / Organisation	Taylor Wimpey
Agent ID	1323730
Agent Name	Mr Richard Barton
Position	
Company / Organisation	Avison Young
Number	Policy WS 8.2
Title	Sustainable Construction – Energy Efficiency, Overheating and Cooling, and Water Usage
To which part of the Local Plan does this representation relate?	Policy
<ul style="list-style-type: none"> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment 	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 8.2
Please state which Site ID/Reference this	

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

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

<p>to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>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>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s),</p>	<p>It is necessary for Avison Young to attend and participate in the examination, on behalf of Taylor Wimpey UK Limited, in order to discuss the technical evidence and strategy in relation to housing requirement and delivery and the need for Green Belt release.</p>

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

Comment ID	LPSD-526
Person ID	1323731
Include files	LPSD-514-533,1276-EM-Barton-Attach 12 of 12 2207_Redacted.pdf
Consultee Name	Mrs Brigid Edwards
Position	
Company / Organisation	Taylor Wimpey
Agent ID	1323730
Agent Name	Mr Richard Barton
Position	
Company / Organisation	Avison Young
Number	Policy WS 8.4
Title	On site Renewable and Low Carbon Energy
To which part of the Local Plan does this representation relate?	Policy
<ul style="list-style-type: none"> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment 	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 8.4
Please state which Site ID/Reference this	

representation relates to.	
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 Lever Causeway) and Consortium response

as precise as possible.	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.
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.

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

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
 * No, I do not wish to participate in hearing session(s)
 * Yes, I wish to participate in hearing session(s)

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

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

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

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

Comment ID	LPSD-527
Person ID	1323731
Include files	LPSD-514-533,1276-EM-Barton-Attach 12 of 12 2207_Redacted.pdf
Consultee Name	Mrs Brigid Edwards
Position	
Company / Organisation	Taylor Wimpey
Agent ID	1323730
Agent Name	Mr Richard Barton
Position	
Company / Organisation	Avison Young
Number	Policy WS 8.5
Title	Carbon Compensation through Renewable and Low Carbon Energy
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 8.5
Please state which Site ID/Reference this	

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

as precise as possible.	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.
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.

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

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
 * No, I do not wish to participate in hearing session(s)
 * Yes, I wish to participate in hearing session(s)

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

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

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

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

Comment ID	LPSD-528
Person ID	1323731
Include files	LPSD-514-533,1276-EM-Barton-Attach 12 of 12 2207_Redacted.pdf
Consultee Name	Mrs Brigid Edwards
Position	
Company / Organisation	Taylor Wimpey
Agent ID	1323730
Agent Name	Mr Richard Barton
Position	
Company / Organisation	Avison Young
Number	Policy WS 8.8
Title	Climate Change and Energy Statement
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 8.8
Please state which Site ID/Reference this	

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

<p>as precise as possible.</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"> •It is unclear how the more onerous requirements will be achieved in practice; •The transition arrangements in the Building Regulations have been primarily designed to allow developers to prepare for achieving the new requirements; and •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. <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>omplies with the Duty to co-operate * Yes * No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	<p>N/A</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>N/A</p>
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Please 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>If your representation is seeking a modification to the plan, do you consider it necessary to</p>	<p>Yes, I wish to participate in hearing session(s)</p>

<p>participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>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>

Comment ID	LPSD-529
Person ID	1323731
Include files	LPSD-514-533,1276-EM-Barton-Attach 12 of 12 2207_Redacted.pdf
Consultee Name	Mrs Brigid Edwards
Position	
Company / Organisation	Taylor Wimpey
Agent ID	1323730
Agent Name	Mr Richard Barton
Position	
Company / Organisation	Avison Young
Number	Policy WS 10.1
Title	Provision of Infrastructure
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 10.1
Please state which Site ID/Reference this	

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

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

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

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

Comment ID	LPSD-530
Person ID	1323731
Include files	LPSD-514-533,1276-EM-Barton-Attach 12 of 12 2207_Redacted.pdf
Consultee Name	Mrs Brigid Edwards
Position	
Company / Organisation	Taylor Wimpey
Agent ID	1323730
Agent Name	Mr Richard Barton
Position	
Company / Organisation	Avison Young
Number	Policy WD 3
Title	Biodiversity and Geodiversity
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WD 3
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please see submitted representations prepared by Avison Young on behalf of Taylor Wimpey UK Limited for comments on the soundness of the Local Plan and specific comments on the draft policy. Refer to Consortium response and attachment (Land at Lever Causeway) (from para 5.85)

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

Comment ID	LPSD-531
Person ID	1323731
Include files	LPSD-514-533,1276-EM-Barton-Attach 12 of 12 2207_Redacted.pdf
Consultee Name	Mrs Brigid Edwards
Position	
Company / Organisation	Taylor Wimpey
Agent ID	1323730
Agent Name	Mr Richard Barton
Position	
Company / Organisation	Avison Young
Number	Policy WD 4.3
Title	Sustainable Drainage Systems (SuDS) and Natural Flood Management
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WD 4.3
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please see submitted representations prepared by Avison Young on behalf of Taylor Wimpey UK Limited for comments on the soundness of the Local Plan and specific comments on the draft policy. REFER TO CONSORTIUM RESPONSE AND ATTACHMENT (Land at Lever Causeway)(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>to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>it is 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>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s),</p>	<p>It is necessary for Avison Young to attend and participate in the examination, on behalf of Taylor Wimpey UK Limited, in order to discuss the technical evidence and strategy in relation to housing requirement and delivery and the need for Green Belt release.</p>

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

Comment ID	LPSD-532
Person ID	1323731
Include files	LPSD-514-533,1276-EM-Barton-Attach 12 of 12 2207_Redacted.pdf
Consultee Name	Mrs Brigid Edwards
Position	
Company / Organisation	Taylor Wimpey
Agent ID	1323730
Agent Name	Mr Richard Barton
Position	
Company / Organisation	Avison Young
Number	Policy WD 18
Title	Health Impact Assessment
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WD 18
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please see submitted representations prepared by Avison Young on behalf of Taylor Wimpey UK Limited for comments on the soundness of the Local Plan and specific comments on the draft policy. Refer to Consortium response and attachment (Land at Lever Causeway) (para 5.94)

as precise as possible.	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
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. 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.

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

LPSP-533

Comment ID	LPSP-533
Person ID	1323731
Include files	LPSP-514-533,1276-EM-Barton-Attach 12 of 12 2207_Redacted.pdf LPSP-514-533,1276-EM-Barton-Attach 1 of 12 2207_Redacted.PDF LPSP-514-533,1276-EM-Barton-Attach 2 of 12 2207_Redacted.PDF LPSP-514-533,1276-EM-Barton-Attach 3 of 12 2207_Redacted.PDF LPSP-514-533,1276-EM-Barton-Attach 4 of 12 2207_Redacted.PDF LPSP-514-533,1276-EM-Barton-Attach 5 of 12 2207_Redacted.pdf LPSP-514-533,1276-EM-Barton-Attach 6 of 12 2207_Redacted.pdf LPSP-514-533,1276-EM-Barton-Attach 7 of 12 2207_Redacted.PDF LPSP-514-533,1276-EM-Barton-Attach 8 of 12 2207_Redacted.PDF LPSP-514-533,1276-EM-Barton-Attach 9 of 12 2207_Redacted.pdf LPSP-514-533,1276-EM-Barton-Attach 10 of 12 2207_Redacted.pdf LPSP-514-533,1276-EM-Barton-Attach 11 of 122207_Redacted.pdf
Consultee Name	Mrs Brigid Edwards
Position	
Company / Organisation	Taylor Wimpey
Agent ID	1323730
Agent Name	Mr Richard Barton
Position	
Company / Organisation	Avison Young
Number	Policy WP 4.2
Title	Residential Sites
To which part of the Local Plan does this representation relate?	Policy
<ul style="list-style-type: none"> * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment 	

Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WP 4.2
Please state which Site ID/Reference this representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
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

<p>* Not Positively Prepared</p> <p>* Not Justified</p> <p>* Not Effective</p> <p>* Not Consistent with National Policy</p>	
<p>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</p>	<p>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 (Land at Lever Causeway) (from para 5.82) (Attachment 12 of 12)</p> <p>The site at Lever Causeway is not included in draft Policy WP 4.2 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>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	N/A
<p>If you wish to make a separate representation, relating to legal compliance,</p>	N/A

<p>soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>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 4.2.</p> <p>(Lever Causeway) should be included in draft Policy WP 4.2.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? * No, I do not wish to</p>	<p>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>

Comment ID	LPSD-534
Person ID	1248032
Include files	LPSD-534, 539-EM-Crook 1107_Redacted.pdf
Consultee Name	Kay Crook
Position	Chairman
Company / Organisation	Mountwood Society
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WP 3
Title	Policy for Suburban Birkenhead
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	5.28; 1.
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	5.28 1. "The sandstone ridge extends from Noctorum Ridge across Wirral to Prenton Ridge at Mountwood." (Prenton Ridge is actually higher than Noctorum ! !) Due to the topography of Wirral, this fact must be highlighted within this statement. It has currently been overlooked and should be amended accordingly. Our submissions are set clearly within quotation marks for inclusion within your text at the stated points.

<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</p>	<p>Amend paragraph 5.28, point 1. to include: The sandstone ridge extends from Noctorum Ridge across Wirral to Prenton Ridge at Mountwood.</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**

LPSP-535

Comment ID	LPSP-535
Person ID	1248612
Include files	LPSP-535-EM-Woodford Form 2507_Redacted.pdf LPSP-535,1047-EM-Woodford Attach 2507_Redacted.pdf
Consultee Name	AM Ventures 3
Position	
Company / Organisation	
Agent ID	1323869
Agent Name	Mr Richard Woodford
Position	
Company / Organisation	Avison Young
Number	Policy WS 3.2
Title	Housing Density
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 3.2
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	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 Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	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. The Viability representations prepared by Roger Hannah further this and conclude that the gross overestimation of site density across the appraisals for the typologies and strategic sites results in an overstatement of viability based on undeliverable scheme numbers. The majority of sites will therefore be overstating their capacity throughout the viability advice and Local Plan allocations and delivery targets. This impacts on the amounts of the and that is identified to meet housing need, with the current overstatement of deliverable site densities resulting in less land than is required being allocated for residential development.

as precise as possible.	WS3.2 needs to be amended to reflect deliverable schemes based on the council's housing mix requirements and market facing mix requirements for housing led schemes and as such is not considered to be sound as it is not positively prepared, justified, effective or consistent with national policy [Please refer to the Consortium's attached soundness representations, Five Technical Papers and documents summarising the key issues with the Wirral Local Plan and its evidence base. - LPSP408]
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	Amend Policy WS3.2 to reflect deliverable schemes based on the council's housing mix requirements and market facing mix requirements for housing led schemes.

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

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
 * No, I do not wish to participate in hearing session(s)
 * Yes, I wish to participate in hearing session(s)

If you wish to participate in the

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

The Issue raised need discussion

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

Comment ID	LPSD-536
Person ID	1324658
Include files	LPSD-536-EM-Tiwana Form 2507_Redacted.pdf LPSD-536, 810,846-849,1397-1399-EM-Tiwana Attach 2507_Redacted.pdf
Consultee Name	Ms Jessica Bond
Position	
Company / Organisation	Barrat David Wilson
Agent ID	1245543
Agent Name	Mr Bal Tiwana
Position	Principal Planner
Company / Organisation	Stantec UK Ltd
Number	Policy WS 1.1
Title	Homes
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	WS1.1
Please state which Policy Number this representation relates to.	

Please state which Site ID/Reference this representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	No
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is	Please refer to attachment. At the outset, we are extremely disappointed to note that despite BDW's site being identified as

unsound. Please be as precise as possible.	<p>one of 12 potential 'Dispersed Green Belt Release' sites within the Local Plan Issues & Options document which was consulted upon by Wirral Council in Spring 2020, the site is no longer identified as proposed to be released from the Green Belt to meet Wirral's challenging development needs. We are of the firm view that the Council has over-estimated the ability for the borough's housing needs to be delivered using a brownfield regeneration, urban intensification approach. We strongly recommend that additional sustainable and deliverable residential sites – including BDW's site at Chester Road – should be identified as proposed residential allocations within the emerging Wirral Local Plan, in order for the document to be found 'sound' in accordance with national policy. BDW's site at Chester Road, Heswall represents a deliverable opportunity in a sustainable location that will deliver a range of important benefits without harming the purposes of the Green Belt. This conclusion has been reached by the Council as part of its previous evidence base work to inform the emerging Local Plan. We are of the firm view that this same conclusion remains valid today, such that the site should be allocated for development, in order for the Council to meet its challenging development needs and for the emerging Local Plan to be assessed as 'sound'.</p>
omplies with the Duty to co-operate * Yes * No	No
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	no info provided
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.	no info provided

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

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

Comment ID	LPSD-537
Person ID	1323611
Include files	LPSD-537-EM-Bachman_Redacted.pdf
Consultee Name	Mr Erik Bachman
Position	Managing Director
Company / Organisation	HarbisonWalker International Ltd
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WP 4.2
Title	Residential Sites
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	RES SA 4.7

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.	operational refractory plant - concern regarding impact of residential development - nuisance, safety etc please see full details attached. But include With the housing development in the immediate surroundings of our yard, we expect that the new neighbors will find our operation a nuisance and will start procedures and complaints to have us stop our activities. Or we as a company will be confronted with additional measures to limit noise and dust. This may lead to a requirement of unacceptable investments and eventually closure of the plant with a loss of

	<p>around 40 jobs direct and potentially another 10 jobs indirect supplying to HWI.</p> <p>At this moment there are no specific limitations to our operation than the general industrial standards.</p> <p>When houses are built that close to our premises, we feel that we will be limited in our ability to expand and even continue our business.</p> <p>h</p>
<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations</p>	

Assessment, please make them here.

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

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

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

hearing session(s)	
<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>	

LPSD-538

Comment ID	LPSD-538
Person ID	1323872
Include files	LPSD-538,767,768,770-775 & 777-EM-Muir Form 2507_Redacted.pdf LPSD-538,767,768,770-775 & 777-EM-Muir Attach 2507_Redacted.pdf
Consultee Name	Mr Warren Marshall
Position	
Company / Organisation	Peel Ports Group Ltd
Agent ID	1323871
Agent Name	Mr Darren Muir
Position	Associate Planner
Company / Organisation	Pegasus Group
Number	Policy WS 4.3
Title	The Port and Maritime Zone
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Site
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	

Please state which Site ID/Reference this representation relates to.	EMP -RA3.1
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is	Please refer to accompanying report - Regulation 19 Consultation Response Peel Ports Group supports the overall intention of Policy WS 4.3 and welcomes the fact that previous comments have been integrated into the wording of the policy. For reasons outlined in the following sections, it is also considered that the policy is amended such that the following sites are included as safeguarded port-related development and infrastructure in Part F:

unsound. Please be as precise as possible.	<ul style="list-style-type: none"> •EMP-RA3.1–Twelve Quays •EMP-SA2.2–Tower Wharf
omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	N/A
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	N/A
Please set out the modification(s) you consider necessary	<p>Please refer to accompanying report - Regulation 19 Consultation Response</p> <p>Sites currently identified as EMP-RA3.1 and EMP-SA2.2 should be allocated for safeguarded port-related development and infrastructure within Part F of the policy (WS 4.3)</p>

<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>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s),</p>	<p>It is considered necessary to participate in the hearing sessions to contribute to the discussion surrounding the requested amendments to the listed policies and allocations, and to be available to provide any clarity or further information to assist the preparation of the Local Plan. Please refer to accompanying report title R002v3 - Regulation 19 Consultation Response for further details.</p>

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

Comment ID	LPSD-539
Person ID	1248032
Include files	LPSD-534, 539-EM-Crook 1107_Redacted.pdf
Consultee Name	Kay Crook
Position	Chairman
Company / Organisation	Mountwood Society
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WP 3
Title	Policy for Suburban Birkenhead
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	5.29; 7.
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Effective
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	5.29 7. "Mountwood Conservation Area is derived from the two geographical areas of Prenton and Higher Bebington lying within Settlement Areas 3 and 4." It is defined by - - - - - - - - The houses which form the core of the area are individually designed.

	<p>"The eminent Architect, Sir Arnold Thornley, designed 8 properties within Mountwood with 1 residence for himself. His extended portfolio involved Stormont in Ireland, the Town Hall in Wallasey and the Port of Liverpool Building on the waterfront." They can be characterised broadly as Arts and Crafts with - - - It is of strategic importance that the above facts are acknowledged and included within Mountwood Conservation Area's Policy submission and that the relevant maps are adjusted accordingly in order to avoid possible "wriggle room" within any future controversial Planning Applications. Our submissions are set clearly within quotation marks for inclusion within your text at the stated points.</p>
omplies with the Duty to co-operate * Yes * No	
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in	

<p>relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Add the text in quotations to Paragraph 5.29, point 7: "Mountwood Conservation Area is derived from the two geographical areas of Prenton and Higher Bebington lying within Settlement Areas 3 and 4." It is defined by - - - - - The houses which form the core of the area are individually designed. "The eminent Architect, Sir Arnold Thornley, designed 8 properties within Mountwood with 1 residence for himself. His extended portfolio involved Stormont in Ireland, the Town Hall in Wallasey and the Port of Liverpool Building on the waterfront." They can be characterised broadly as Arts and Crafts with - - -</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? * No, I do not wish to participate in</p>	

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

Comment ID	LPSD-540
Person ID	1323504
Include files	LPSD-540-542,546,610-Jones Attach 1307_Redacted.pdf
Consultee Name	Mr Chris Jones
Position	Senior Advisor - Development Planning
Company / Organisation	Natural Resources Wales
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WD 3
Title	Biodiversity and Geodiversity
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WD 3
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	<p>please refer to attachment</p> <p>Dee Estuary SAC</p> <p>Please note that NRW is responsible for issuing discharge consents in Wales.</p> <p>Indicative condition assessments of marine SACs were undertaken in 2018 and these have not been referenced; they can be found here: Natural Resources Wales / Indicative feature condition assessments for European marine sites (EMS)</p> <p>Indicative condition assessments of marine SACs were undertaken in 2018 and these have not been referenced; they can be found here: [hyperlink]</p> <p>According to Water Watch Wales (NRW's version of the EA's Catchment Explorer), the Dee (N. Wales) water body was of Moderate status for Dissolved Inorganic Nitrogen (DIN) in 2015 and is now of Good status (2021). However, it is still very close to Moderate status and preventing deterioration to this recently designated Good status water body remains a concern. Currently, Water Framework Directive (WFD) status is used in NRW SAC condition assessments, so the 2015 classification has resulted in the Dee Estuary SAC being identified as in unfavourable condition for water quality. We note however that there is no planned development within the Local Plan that would be likely to affect the Heswall (D r Cymru / Welsh Water) Wastewater Treatment Works.</p> <p>The draft Local Plan states, on p. 91: "It is considered that the company's approach to wastewater treatment and meeting the requirements of the Water Framework Directive (WFD) is adequate to prevent adverse effects on water quality in coastal sites". The draft Local Plan also states on p. 91 that: "each authority is legally bound to ensure that allocated growth can be accommodated within the existing wastewater treatment infrastructure and the Environment Agency's discharge consents". We understand that this acknowledges the responsibility for safeguarding water quality of the water company and the EA/NRW at licensing project-level stage. We note that the licensing process will need to consider the condition of the SPAs and SACs through HRA and the status of relevant WFD water bodies through WFD compliance assessment.</p> <p>There appears to be sufficient mitigation in terms of marine water quality within the draft Local Plan.</p>
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please	

<p>indicate the reason(s) why:</p> <p>* Not Positively Prepared</p> <p>* Not Justified</p> <p>* Not Effective</p> <p>* Not Consistent with National Policy</p>	
<p>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</p>	
<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation,</p>	<p>Protected Sites for Nature Conservation</p> <ul style="list-style-type: none"> • Deeside and Buckley Newt Sites Special Area of Conservation (SAC) • Halkyn Mountain SAC

<p>relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	<p>We concur with both the assessment and conclusions of the HRA in respect of the Deeside and Buckley Newt Sites SAC and the Halkyn Mountain SAC.</p> <ul style="list-style-type: none"> • Dee Estuary Special Protection Area (SPA) and Ramsar site • Liverpool Bay SPA <p>We are satisfied with the conclusions and recommendations of the HRA with regards to the Dee Estuary SPA and Ramsar site and Liverpool Bay SPA.</p> <p>Provided that the text in paragraph 5.74 of the HRA is included in the Local Plan and followed appropriately we are satisfied that the plan will not result in Likely Significant Effects on the qualifying features of the Dee Estuary SPA and Ramsar site.</p>
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p>	

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

Comment ID	LPSD-541
Person ID	1323504
Include files	LPSD-540-542,546,610-Jones Attach 1307_Redacted.pdf
Consultee Name	Mr Chris Jones
Position	Senior Advisor - Development Planning
Company / Organisation	Natural Resources Wales
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WD 3
Title	Biodiversity and Geodiversity
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Habitat Regulations Assessment
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

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

<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>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 refer to attachment. Indicative condition assessments of marine SACs were undertaken in 2018 and these have not been referenced; they can be found here: Natural Resources Wales / Indicative condition assessments for European marine sites (EMS) [https://naturalresources.wales/guidance-and-advice/environmental-topics/wildlife-and-biodiversity/protected-areas-of-land-and-seas/indicative-feature-condition-assessments-for-european-marine-sites]</p> <p>Further detail on River Dee and Bala Lake SAC required in HRA.</p>
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</p>	<p>Indicative condition assessments of marine SACs were undertaken in 2018 and these have not been referenced; they can be found here: Natural Resources Wales / Indicative feature condition assessments for European marine sites (EMS) [https://naturalresources.wales/guidance-and-advice/environmental-topics/wildlife-and-biodiversity/protected-areas-of-land-and-seas/indicative-feature-condition-assessments-for-european-marine-sites]</p> <p>We advise that further detail should be provided with regards to wastewater discharges resulting from the planned housing and industrial development. Paragraph 4.30 of the HRA states that the River Wirral '...lies 7.3km south of Wirral and therefore upstream of any watercourses that local WwTWs are likely to discharge into.' We advise that additional information should be provided to clarify that there is no direct discharge of treated effluent from the River Wirral into the River Dee or any of its tributaries receiving new discharges of treated sewage effluent or any industrial pollutants as a result of the Local Plan. Deterioration in water quality could lead to the impairment or loss of the following features, which are sensitive to water quality changes</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.

Paragraph 4.43 of the HRA identifies likely significant effects regarding water quantity/flow. Increased demand for water and therefore higher abstraction rates may result in reduced and/or fluctuating flows, which may disrupt the stable flow regime relied upon by the qualifying features of the SAC. Again, we advise that clarification is provided on this aspect and the potential impacts on the SAC and how they may be mitigated.

We note that the River Dee and Bala Lake SAC is listed in Section 4.1 of the HRA as a European site within 10km of Wirral Borough that is sensitive to recreational pressure arising from the 13,360 net hectares of floodplain allocated in the Wirral Local Plan. However, it appears to have been inadvertently omitted from the subsequent explanation about why the relevant sites have been screened in to / out from Appropriate Assessment. We advise that this information is provided in the final HRA.

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

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

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

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

* **Yes**

* **No**

Comment ID	LPSD-542
Person ID	1323504
Include files	LPSD-540-542,546,610-Jones Attach 1307_Redacted.pdf
Consultee Name	Mr Chris Jones
Position	Senior Advisor - Development Planning
Company / Organisation	Natural Resources Wales
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WS 10.1
Title	Provision of Infrastructure
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Paragraph(s)
Please state which paragraph number(s) this representation relates to.	3.220
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	<p>Please refer to attachment.</p> <p>We note the acknowledgement that it is the responsibility of the water companies to fulfil their regulatory duties in terms of WFD compliance and that this will act as the mechanism to ensure the status and objectives of the WFD water bodies are not jeopardised. We support the proposal to incorporate the following text into Strategic Policy WS 10.1 (Provision of Infrastructure)</p> <p>"The Council will liaise with United Utilities and Dwr Cymru Welsh Water to confirm that there is sufficient headroom in the existing discharge consent to accommodate the growth planned for Wirral over the entire Plan period. If constraints are identified, housing delivery will need to be phased to keep in line with the available wastewater treatment infrastructure."</p>
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	<p>We note the acknowledgement that it is the responsibility of the water companies to fulfil their regulatory duties in terms of WFD compliance and that this will act as the mechanism to ensure the status and objectives of the WFD water bodies are not jeopardised. We support the proposal to incorporate the following text into Strategic Policy WS 10.1 (Provision of Infrastructure):</p> <p>"The Council will liaise with United Utilities and Dwr Cymru Welsh Water to confirm that there is sufficient headroom in the existing discharge consent to accommodate the growth planned for Wirral over the entire Plan period. If constraints are identified, housing delivery will need to be phased to keep in line with the available wastewater treatment infrastructure."</p>
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	

<p>omplies with the Duty to co-operate</p> <p>* Yes</p> <p>* No</p>	
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound,in respect of</p>	<p>We advise that a project-level WFD Compliance Assessment should be submitted to accompany any planning application with potential effects on WFD water bodies and this will serve to assess at the project level, whether the status or objectives of WFD water bodies may be jeopardised by the project.</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**

LPSD-543

Comment ID	LPSD-543
Person ID	1323875
Include files	LPSD-543-EM-Harris Form 1 of 3 2507_Redacted.pdf LPSD-543-545-EM-Harris Attach 2507_Redacted.pdf
Consultee Name	Seaview Meadows Sustainable Plannin
Position	
Company / Organisation	Seaview Meadows Sustainable Planning Ltd
Agent ID	1248449
Agent Name	Mr Stephen Harris
Position	
Company / Organisation	Emery Planning
Number	Policy WP 5.1
Title	Residential Sites
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WP 5.1
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is	Please see attached representations The total supply from allocated sites in WP5.1 is 353 all of which are within the urban area.

<p>unsound. Please be as precise as possible.</p>	<ul style="list-style-type: none"> • RES-SA5.1 - Moreton Family Centre, Pasture – 75 – The SHLAA states “Council controlled site being brought forward by Wirral Growth Company following public consultation to provide 75 bed Extra Care facility for independent living. Capacity and trajectory are based on developers assessment”. As this is a C2 use it should not be included as C2 is separate to the housing requirement. • RES-SA5.3 - East of Typhoo, Reeds Lane – 100 - The SHLAA states “Vacant surplus expansion land to west of Food production units now being brought forward by landowner for residential development as part of a mixed use proposal including additional employment development, subject to mitigation for flood risk. Capacity is based on submissions received at Regulation 18 consultation. Trajectory is based Councils standard lead in times and build out rates.” • RES-SA5.4 - Former Foxfield School, Douglas Drive – 65 - Cleared site in residential area, being brought forward by Wirral Growth Company following public consultation. The site capacity and trajectory is based on developers delivery statement. • RES-SA5.5 - Former Stirrup PH, Arrowe Park Road – 45 – application approved in July 2020 for 15 dwellings. The capacity should be reduced by 30 dwellings. SHLAA states not started. • RES-SA5.7 - Land at Knutsford Road, Moreton – 36 The SHLAA states “Council controlled site being brought forward for residential development for family homes by Wirral Growth Company following public consultation. Capacity is based on developer assessment and delivery is expected within the next five years”. • RES-SA5.8 - Former Dodd's Builders Merchants Bermuda Road – 14 - APP/18/01284 approved September 2020 but SHLAA states not started. <p>From this initial search 105 dwellings should be removed. On the other sites two have consent but not started and there is no evidence on delivery on the other sites. Therefore, Green Belt land is required to meet Leasowe's housing needs and the following site should be allocated.</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	<p>Yes</p>
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate</p>	

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>Please see attached representations</p> <p>Remove RES-SA5.1 from the housing supply. Reduce the capacity of RES-SA5.5 by 30 dwellings. Allocate SHLAA 0637 for development in the Local Plan and release Green Belt land to meet Leasowe's housing need.</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>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>We have significant concerns with the Local Plan and on WS1 .1 the plan period set out, the housing requirement and housing supply.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept updated of future stages of the Wirral Local Plan 2021-2037? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan).</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>

LPSD-544

Comment ID	LPSD-544
Person ID	1323875
Include files	LPSD-543-545-EM-Harris Attach 2507_Redacted.pdf LPSD-544-EM-Harris Form 2 of 3 2507_Redacted.pdf
Consultee Name	Seaview Meadows Sustainable Plannin
Position	
Company / Organisation	Seaview Meadows Sustainable Planning Ltd
Agent ID	1248449
Agent Name	Mr Stephen Harris
Position	
Company / Organisation	Emery Planning
Number	Policy WS 10.6
Title	Open Space
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 10.6
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please see attached representations The site is designated within the much wider CREC-SA8.1 (North Wirral Coastal Park). Our client's land is private land and object to the designation of the land as part of a Coastal Park. There has been no approach to the owners and therefore it is simply not deliverable and should be removed. It should exclude our clients land and run to the north as it does to the north of the golf course. Policy WS10.6 should be written so that land can be brought forward for development on sites that would not prejudice the integrity of the Coastal Park but also that

as precise as possible.	any enabling development on the site could enhance the park by providing public access onto part of the site or a community facility along its route. That could then enable private land to be brought forward and planning gain achieved.
omplies with the Duty to co-operate * Yes * No	Yes
Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.	
Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.	
If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.	
Please set out the modification(s) you consider necessary to make the Local	<p>Please see attached representations</p> <p>remove site (SHLAA 0637 - North of Leasowe Road) from designation as North Wirral Coastal Park. Rewrite the policy so that land can be brought forward for development on sites that would not prejudice the integrity of the Coastal Park but also that any enabling development on the site could enhance the park by providing public access onto part of the site or a community facility along its route.</p>

<p>Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>The site selection methodology needs to be reviewed and revised, with a clearer focus upon meeting housing needs and the purposes of the Green Belt. SHLAA site 0637 is considered available, achievable, developable and suitable to make a further contribution to the housing need (and / or employment) on the Wirral. The site is well served by public transport and is accessible to a wide range of services and facilities within easy walking and cycling distances. It is considered a sustainable location in accordance with the objectives of the Framework.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s), please outline why</p>	<p>We have significant concerns with the Local Plan and on WP10.6 in relation to our client's land.</p>

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

LPSD-545

Comment ID	LPSD-545
Person ID	1323875
Include files	LPSD-545-EM-Harris Form 3 of 3 2507_Redacted.pdf LPSD-543-545-EM-Harris Attach 2507_Redacted.pdf
Consultee Name	Seaview Meadows Sustainable Plannin
Position	
Company / Organisation	Seaview Meadows Sustainable Planning Ltd
Agent ID	1248449
Agent Name	Mr Stephen Harris
Position	
Company / Organisation	Emery Planning
Number	Policy WS 1.1
Title	Homes
To which part of the Local Plan does this representation relate?	Policy
* Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1.1
Please state which Site ID/Reference this	

representation relates to.	
Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	Yes
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	No
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
Please give details of why you consider the Local Plan is unsound. Please be	Please see attached representations The plan period is proposed to be 2021 to 2037. Paragraph 22 of the Framework requires strategic policies to cover a 15 year plan period from adoption: "Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure."

as precise as possible.

The base date used for the purposes of monitoring of the housing and employment supply, is 1 April 2021. As a result, the end date of the strategic policies relating to housing and employment land supply is 31 March 2037. Therefore, in order for the strategic policies to cover at least a 15-year period from adoption, the plan must be adopted by 31 March 2022. That has already passed. Therefore, even on the basis of the Council's own schedule, the plan will not cover a period of 15 years at adoption and is considered to be unsound and not in accordance with national planning policy.

We consider that the Submission Draft has a number of critical failings:

- The overall housing requirement of 13,360 dwellings over the plan period (2021-2037) is too low. The circumstances in Wirral provide clear justification for planning for a higher housing need figure on a standard method at the base date of 803 dwellings per annum. There is also a need for a higher requirement to the standard method. These are as follows:

- o The impacts of previous housing under-delivery are quantifiable and significant. The period of extreme under-delivery coincides with the following stark statistics which show that there are 5,201 households in critical housing need:

- o overcrowding - a total of 3,621 households living in overcrowded conditions (2.5% of all households); and,

- o homelessness - a total of 750 households who are either homeless or living in temporary accommodation. It should be noted that the 2019 SHMA states that there were 1,580 homeless households.

- o The identified need for affordable housing will not be met. The Draft SHMA (January 2020) concluded that there are 12,705 existing household in affordable need which was 705 per annum. This is now 374 per annum due to a mathematical calculation to reduce the shortfall over 10 years rather than 5 years. Even the 5,201 households in critical housing need equates to 32.7% of the total requirement. Therefore, the Wirral has and will continue to face an unprecedented affordability crisis that requires urgent and radical policy responses through the Local Plan. This now relies on the Secretary of State as the LPA has not sought to address this key issue.

- o These affordable housing need figures show that the mathematical formula (standard method) is not appropriate to derive the housing requirement and those real people in housing need now will be failed by the Local Plan unless changes are made through the Examination. Whilst the standard method is the starting point, under such circumstances there should be an increase in the housing requirement in accordance with the PPG.

- Insufficient housing land has been identified in the short term, and overall, to meet the identified requirement (let alone a higher figure). There is a significant overreliance upon intensification and rescheduling of deliverable and developable site; conversions, windfall sites; changes of use and empty homes. In short the overall evidence base in relation to housing land supply is severely lacking and unrealistic.

Large site allocations

The Council anticipates a very high level of delivery from large site allocations, in particular 2,911 dwellings on Wirral Waters, 1,476 dwellings on Hind Street & St Werburgh's, and 1,304 dwellings on Central Birkenhead. If one or more of these sites does not come forward as expected, this could significantly impact the Council's ability to meet its housing needs.

Development in urban settlement areas

The Council includes 2,424 dwellings from allocations in seven urban settlement areas, including 1,151 dwellings in the five year period from 2021 – 2026. For the majority of the sites included in years 1 – 5 of the Council's trajectory, there is no clear evidence to demonstrate their deliverability as required by the Framework. In the absence of such evidence, these sites such be excluded from the five year supply.

The Council's housing land supply has been grossly inflated. There is a significant shortfall in the supply of housing over the plan period to even meet the Council's grossly underestimated requirement and therefore, Green Belt land is required and must be released. The scale of that release for development should revert to the position proposed by the Council in 2018.

Whilst we do not object to the principle of redeveloping longstanding previously developed sites, subject to the concerns expressed regarding the council's assessment of supply, further sites are required to address Wirral's housing needs, and these will have to be releases from the Green Belt. Therefore, we consider that the Development and Regeneration Strategy will not meet the housing needs in the plan period and should be altered.

It will also not be delivered during the plan period without correctly assessing and meeting housing needs and adopting a variety and mix of sites for development, particularly housing across the Wirral. This inevitably will involve the release of Green Belt land and exceptional circumstances to justify alterations to the Green Belt boundaries (as set out in paragraph 141 of the NPPF) do exist in Wirral.

Due to no Green Belt release, the plan has insufficient flexibility to respond to change, for example the non-delivery of the development in the urban areas. In the absence of such flexibility, there is a real risk that the Local Plan will simply exacerbate the current housing crisis across Wirral. The plan fails to provide safeguarded land to meet longer term development needs which is the minimum requirement for when the allocated sites do not come forward.

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

Yes

<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please</p>	<p>Please see attached representations</p> <p>The plan period should be extended to 2039 as a minimum.</p> <p>The minimum starting point should be 853 dwellings per annum for the period 2021 to 2039 which is 15,354 (853 x 18 years) and a 20% flexibility allowance so a total supply should be 18,425 dwellings.</p> <p>In order to be sufficiently flexible, the Plan should identify more small and medium-sized housing allocations to ensure that a rolling five year supply can be maintained across the plan period.</p> <p>Release Green Belt land to meet housing need in the Local Plan to the position proposed by the Council in 2018.</p>

<p>note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:</p>	<p>We have significant concerns with the Local Plan and on WS1 .1 the plan period set out, the housing requirement and housing supply.</p>
<p>Notification of Next Stages in Wirral's Local Plan Preparation - Would you like to be kept</p>	<p>Yes</p>

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

* Yes
* No

Comment ID	LPSD-546
Person ID	1323504
Include files	LPSD-540-542,546,610-Jones Attach 1307_Redacted.pdf
Consultee Name	Mr Chris Jones
Position	Senior Advisor - Development Planning
Company / Organisation	Natural Resources Wales
Agent ID	
Agent Name	
Position	
Company / Organisation	
Number	Policy WD 4.2
Title	Flood Risk
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	Sustainability Appraisal
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	
Please state which Site ID/Reference this representation relates to.	

Please state which Policies Map (Inset Map number(s)) this representation relates to.	
Legally compliant * Yes * No	
Please give details of why you consider the Local Plan is legally compliant. Please be as precise as possible.	
Please give details of why you consider the Local Plan is not legally compliant. Please be as precise as possible.	
Sound * Yes * No	Yes
Please give details of why you consider the Local Plan is sound. Please be as precise as possible.	ECC 2 assessed sites are outside of NRW's catchment. No further comments regarding SD 2 flood risk.
If you consider that the Local Plan is not sound, please indicate the reason(s) why: * Not Positively Prepared * Not Justified * Not Effective * Not Consistent with National Policy	
Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.	

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

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

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

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

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

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

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

LPSP-547

Comment ID	LPSP-547
Person ID	1323877
Include files	LPSP-547,1034-1037 and 1405-1407-EM-Storey Attach 2 of 5 2507_Redacted.pdf LPSP-547-EM-Storey Attach 5 of 5 2507_Redacted.pdf LPSP-547-EM-Storey Attach 4 of 5 2507_Redacted.pdf LPSP-547-EM-Storey Attach 1 of 5 2507_Redacted.pdf LPSP-547-EM-Storey Attach 3 of 5 2507_Redacted.pdf
Consultee Name	Mr Alex Bowling
Position	
Company / Organisation	Bellway Homes Ltd
Agent ID	1248751
Agent Name	Mr Jonathan Storey
Position	Senior Planner
Company / Organisation	Pegasus Group
Number	Policy WS 1
Title	The Development and Regeneration Strategy for Wirral 2021 - 2037
To which part of the Local Plan does this representation relate?	Policy
* Paragraph(s) * Policy * Site * Policies Map * Sustainability Appraisal * Habitat Regulations Assessment	
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this	WS 1.1

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

<p>Please give details of why you consider the Local Plan is unsound. Please be as precise as possible.</p>	<p>Please find attached Regulation 19 response on behalf of Bellway Homes outlining how we feel the plan is 'unsound'.</p> <p>The Council have not provided any evidence to justify the quantity of development that can be delivered in Regeneration Areas along with associated infrastructure within the Plan period. The delivery strategy does not take a realistic view on the economic viability issues that are present on the majority of allocated sites. Insufficient evidence has been supplied to prove the viability of these major regeneration sites be it through grant funding or otherwise. If found to be unsound, further consideration would need to be given to housing growth on viable and deliverable sites elsewhere in the Borough. This would act as an exceptional circumstance to justify Green Belt land release.</p> <p>The Council have not provided any evidence to justify the small-scale incremental development envisioned within the towns and villages of the west of Wirral and that they will remain stable and thrive over the plan period, and thus that the Vision is sound. If found to be unsound, further consideration would need to be given to how the towns and villages of the west of Wirral can thrive over the plan period. This could include, for example, going beyond the envisaged small-scale incremental development in a way which is aspirational but deliverable to address the issues faced by these towns and villages over the plan period.</p>
<p>omplies with the Duty to co-operate * Yes * No</p>	<p>Yes</p>
<p>Please give details of why you consider the Local Plan complies with the duty to co-operate. Please be as precise as possible.</p>	
<p>Please give details of why you consider the Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.</p>	
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Sustainability Appraisal, please make them here.</p>	<p>N/A</p>
<p>If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying</p>	<p>N/A</p>

<p>Habitats Regulations Assessment, please make them here.</p>	
<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Please find attached Regulation 19 response on behalf of Bellway Homes outlining the main modifications we consider necessary release green belt land</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? * No, I do not wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>

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

Comment ID	LPSD-548
Person ID	1323731
Include files	LPSD-548 to 567-EM-Barton Attach 13 of 13 2207_Redacted.pdf
Consultee Name	Mrs Brigid Edwards
Position	
Company / Organisation	Taylor Wimpey
Agent ID	1323730
Agent Name	Mr Richard Barton
Position	
Company / Organisation	Avison Young
Number	Policy WS 1.1
Title	Homes
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1.1
Please state which Site ID/Reference this	

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

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

<p>to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Appendix V1) The Soundness representations also suggests the considerable changes required to draft Policy WS 1.1 for it to meet the test of soundness. However, given the significance of this policy to the overall Local Plan strategy and the quantum of changes required, it will not be possible to rectify these fundamental soundness issues through the main modifications process.</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s),</p>	<p>It is necessary for Avison Young to attend and participate in the examination, on behalf of Taylor Wimpey UK Limited, in order to discuss the technical evidence and strategy in relation to housing requirement and delivery and the need for Green Belt release.</p>

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

Comment ID	LPSD-549
Person ID	1323731
Include files	LPSD-548 to 567-EM-Barton Attach 13 of 13 2207_Redacted.pdf
Consultee Name	Mrs Brigid Edwards
Position	
Company / Organisation	Taylor Wimpey
Agent ID	1323730
Agent Name	Mr Richard Barton
Position	
Company / Organisation	Avison Young
Number	Policy WS 1.3
Title	Infrastructure
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 1.3
Please state which Site ID/Reference this	

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

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

<p>to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5, 5a or 5b above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan, Sustainability Appraisal or Habitat Regulations Assessment legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>The issues with draft Policy WS 1.3 relate to the inconsistencies between the Infrastructure Delivery Plan and the CIL and Viability Assessment. This is a fundamental issue with the Local Plan's viability and will be difficult to rectify through the main modifications process</p>
<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p> <p>* No, I do not wish to participate in hearing session(s)</p> <p>* Yes, I wish to participate in hearing session(s)</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>If you wish to participate in the hearing session(s),</p>	<p>It is necessary for Avison Young to attend and participate in the examination, on behalf of Taylor Wimpey UK Limited, in order to discuss the technical evidence and strategy in relation to housing requirement and delivery and the need for Green Belt release.</p>

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

Comment ID	LPSD-550
Person ID	1323731
Include files	LPSD-548 to 567-EM-Barton Attach 13 of 13 2207_Redacted.pdf
Consultee Name	Mrs Brigid Edwards
Position	
Company / Organisation	Taylor Wimpey
Agent ID	1323730
Agent Name	Mr Richard Barton
Position	
Company / Organisation	Avison Young
Number	Policy WS 2
Title	Social Value
To which part of the Local Plan does this representation relate? * Paragraph(s) * Policy * Site * Policies Map * Sustainability * Appraisal * Habitat * Regulations * Assessment	Policy
Please state which paragraph number(s) this representation relates to.	
Please state which Policy Number this representation relates to.	WS 2
Please state which Site ID/Reference this	

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

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

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

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

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

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

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>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>